



2021 Annual Action Plan  
(AAP)

City of Roswell  
Grants Division  
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Roswell, GA 30075  
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# Executive Summary

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

### 1. Introduction

The City of Roswell is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD). This designation qualifies the City to receive grant funding from the Community Development Block Grant (CDBG) entitlement program administered by HUD. The CDBG program allocates annual grants to assist in the development of viable communities by providing decent housing, a suitable living environment, and to expand economic opportunities, principally for low and moderate income (LMI) persons (earning at or below 80 percent of the area median income). To receive an annual allocation of federal grant funds from HUD, the City is required to create a five year Consolidated Plan (strategic plan) and five subsequent one-year Annual Action Plans (AAP).

The Consolidated Plan includes the amount of assistance the City expects to receive during the plan period and the range of activities that may be undertaken including the estimated benefit to persons of low and moderate income. The Annual Action Plans are required to include project or program specifics, such as location, cost, proposed outcome, and any additional descriptive information for each yearly grant award. Primarily, federal regulations require that funds be aimed where the greatest benefit may be attained for LMI residents. To acquire ample public engagement in all aspects and phases of plan development, the City of Roswell interacts with various stakeholders in meetings, workshops, public hearings, and with written correspondence. Additionally, the City informs the Roswell Housing Authority when the Annual Action Plan may impact any public housing development or the surrounding community. Prior to the adoption of an Annual Action Plan, a 30 calendar day public comment period is observed. All comments are recorded and considered in the formulation of the plan. In addition, all comments and responses are included in the appendix of the plan and are forwarded to HUD upon adoption.

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

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

During the development of the City's 2018-2022 Consolidated Plan, the City identified four main goals for the plan period: 1) Improve access to and quality of housing; 2) Planning and administration; 3) Housing/services for homeless/at-risk persons; 4) Provide public services. Through the first three years

of its 2018-2022 Consolidated Plan, the City of Roswell received over \$1.4 million in CDBG funding. On February 25, 2021 HUD notified the City that its 2021 CDBG award would be in the amount of \$470,283. On May 13, 2021 HUD notified the City that it had made a formula error, and the City's official award was actually \$477,213. The activities that the City has identified for these funds are included in this 2021 Annual Action Plan.

It is important to note that the City of Roswell has been granted an exception status by HUD. HUD permits an exception to the LMI area benefit requirement that an area contain 51 percent LMI residents. This exception applies to entitlement communities that have few, if any, areas within their jurisdiction that have 51 percent or more LMI residents. These communities are allowed to use a percentage less than 51 percent to qualify activities under the LMI Benefit category. HUD determines the lowest proportion a grantee may use to qualify an area for this purpose and advises the grantee accordingly.

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

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

During the first three years of the 2018-2022 Consolidated Plan the City received \$1,443,796 from the CDBG Program. The City allocated these funds to 32 different projects, most of which were undertaken by local nonprofits. While many of the program year 2020 projects were delayed due to the coronavirus pandemic, all of them are currently underway and on pace to reach their beneficiary goals. Meanwhile, the City was able to successfully complete several prior year projects during 2020. These projects included:

- 2018 Enable of Georgia, Inc. received \$72,550 for the rehabilitation of group homes for adults with special needs. This project benefitted 16 LMI Roswell households.
- 2018 Housing Authority of the City of Roswell received \$41,200 for the rehabilitation and accessibility improvements at Myrtle Street Apartments. This project benefitted 28 LMI Roswell households.
- 2018 Habitat for Humanity North Central Georgia received \$50,000 for a homeowner repair program for Roswell residents. This project benefitted 3 LMI Roswell households.
- 2019 City of Roswell Public Works Department received \$100,000 for the replacement of the Clara Drive Waterline. This project was completed in late 2020 and beneficiary data is still being collected.
- 2019 HomeStretch, Inc. received \$36,830 for roof and flooring replacement to multi-family housing units. This project benefitted 11 LMI Roswell households for HomeStretch.
- 2019 Housing Authority of the City of Roswell received \$15,000 for the hiring of a Tenant Services Coordinator for training and counseling Housing Authority residents. This project benefitted 87 LMI Roswell households.

- 2019 Housing Authority of the City of Roswell received \$40,500 for infrastructure repairs to Myrtle Street Apartments. This project benefitted 28 LMI Roswell households.
- 2019 North Fulton Child Development Association received \$35,000 for facility and classroom repairs to the Child Development Academy center. This project was completed in late 2020 and beneficiary data is still being collected.
- 2019 North Fulton Community Charities received \$76,545 for the expansion of the Emergency Assistance Center on Elkins Road. This project was completed in late 2020 and beneficiary data is still being collected.
- 2019 Senior Services North Fulton received \$20,000 for transportation services for Seniors to and from medical and wellness appointments. This project benefitted 28 LMI Roswell Seniors.

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

Summary from citizen participation section of plan.

On September 4, 2020 the City of Roswell issued a solicitation for proposals for its Program Year 2021 CDBG funding, estimated at the time to be \$500,000. This amount was later adjusted to reflect the initial official award amount of \$470,283, which was later adjusted to the final official award amount of \$477,213. That solicitation was posted in the September 2, 2020 Roswell Neighbor and on the City’s website. The solicitation closed on September 30, 2020 and the City received 17 proposals requesting over \$1.6 million. A staff committee reviewed the proposals and a total of seven projects were selected for funding.

On April 9, 2021 the City opened its public comment period for review of the City’s 2021 Annual Action Plan. To communicate the availability of the plan, the City ran newspaper ads in the April 7, 2021 Roswell Neighbor and the April 15, 2021 El Nuevo Georgia. The City also posted notices of the plan’s availability on the City’s website and applicable meeting agendas on social media pages. Hard copies of the draft plan were placed at Roswell City Hall and the Roswell Housing Authority, while an electronic copy was available on the City’s website. A public hearing was held at Roswell City Hall at 6:00 PM on April 26, 2021 and the public comment period closed on May 10, 2021. No one attended the public hearing and no comments were received.

Copies of the ads can be found in Appendix A.

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

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

No public comments were received.

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

No public comments were received.

## **7. Summary**

Roswell continues to recognize areas of need throughout the City. The City has created a wide array of heavily researched plans, including this PY2021 Annual Action Plan, to provide a clearer picture of its community as a whole. However, the City's valued nonprofits are also crucial in identifying and addressing these needs. Citizen participation and community input has been, and will continue to be, critical for developing targeted strategies to shape the City's vision and to ensure that federal resources provide the maximum benefit to those citizens in need.

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	ROSWELL	
CDBG Administrator	ROSWELL	Administration Department/Grants Division
HOPWA Administrator		
HOME Administrator	ROSWELL	CDBG Program Office
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Roswell is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD) and is the lead agency for overseeing the City's Community Development Block Grant (CDBG). The City does not directly receive HOME Partnership Initiative (HOME) funds, but instead is a member of the Georgia Urban County Consortium, administered by Cobb County.

**Consolidated Plan Public Contact Information**

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 CDBG@roswellgov.com

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

### **1. Introduction**

This Annual Action Plan reemphasizes the goals established in the Consolidated Plan and specifies the progress the City intends to make in 2021. The City regularly meets with key City stakeholders including nonprofits, City officials, and citizens to ensure that HUD program planning is being optimally targeted to achieve these goals.

Due to the pandemic, staff's face to face consultation with the City's valued nonprofits was limited. However, the City was in constant communication with the nonprofits throughout 2020 and 2021 because of the needs that were created by coronavirus. Thankfully HUD provided the City with two rounds of Community Development Block Grant - Coronavirus (CDBG-CV) funding. The City made all of that funding available to its nonprofits through two open solicitation processes, and City staff continually worked with nonprofit leaders to identify and prioritize the community development areas that were most in need.

The City ultimately issued a solicitation for proposals for this Program Year 2021 CDBG funding on September 4, 2020. In an effort to simplify the application process and conserve resources, the City's Annual Action Plan solicitation process was once again hosted entirely online through ZoomGrants.com. The solicitation was posted in the September 2, 2020 Roswell Neighbor and on the City's website. The solicitation closed on September 30, 2020 and the City received 17 proposals requesting over \$1.6 million. This was a record number of proposals for the City in the nine year existence of its CDBG Program. The City advertised the funding through print and social media outlets and also presented the funding availability to members of the City's nonprofit partnership (NPP). The City's NPP was formed in 2016 and now includes 24 local nonprofit member organizations. The NPP has considerably expanded CDBG staff's consultation since its inception.

### **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 Roswell does not currently manage any public housing. Public housing within the City's jurisdiction is managed by the Housing Authority of the City of Roswell (RHA). The RHA currently maintains 103 housing units. City staff also maintains close relationships with its Community Housing Development Organizations (CHDO), including the North Georgia Community Housing Development Corporation (NGCHDC) and the Housing Initiative of North Fulton (HomeStretch). One of these organizations, HomeStretch, submitted a proposal for 2021 CDBG funds, and it was approved by the City for full funding in the amount of \$70,000.

The City of Roswell has a limited amount of private, governmental, or mental health and service agencies. However, the City has worked closely with Enable of Georgia, an agency that provides housing for adults with special needs. Enable submitted and proposal in 2021 for \$82,700 to rehabilitate four group homes for adults with special needs. The proposal was approved for full funding and will help increase and improve the quality of affordable housing Enable provides to its clients.

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

The City does not have an official HUD-designated COC in its area. However, in February 2012, nine local nonprofit agencies working in various roles to promote and provide affordable housing in North Fulton signed a Memorandum of Understanding (MOU) to formalize their collaboration as the North Fulton Housing and Homeless Continuum of Care. As stated in the MOU, the purpose of the Continuum is to provide “a collaboration of non-profit agencies helping individuals, children and families facing housing crises through comprehensive and seamless delivery of unduplicated services.” The Continuum of Care consists of North Fulton Community Charities, The Drake House, HomeStretch/Housing Initiative of North Fulton, Find a Way Home, Housing Authority of the City of Roswell, Family Promise of Fulton County, Community Action Center, Stand Up for Kids, and Habitat for Humanity-North Central Georgia.

The City works with many of the nonprofit organizations participating in the Continuum of Care and values their insight as part of the Roswell Community. The Continuum of Care has supported the Roswell Housing Authority’s vision for redevelopment in the Groveway neighborhood and the Housing Authority’s Veranda at Groveway project. The Continuum advocated for approval of Grove Way Community projects with City Council and community leaders.

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

The City of Roswell does not receive ESG funds, but it does work closely and frequently with key members of the North Fulton Housing and Homeless Continuum of Care.

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



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	THE DRAKE HOUSE, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City continually consults with Drake House executives to better understand their needs through their participation as a grant subrecipient. Through continued partnerships with the Drake House, the City anticipates improved quality and quantity of services and affordable housing for the homeless and low to moderate income persons.
2	<b>Agency/Group/Organization</b>	Homestretch
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City continually consults HomeStretch executives to better understand their needs through their participation as a grant subrecipient. Through continued partnerships with HomeStretch, the City anticipates improved quality and quantity of services and affordable housing for the homeless and low to moderate income persons.
3	<b>Agency/Group/Organization</b>	NORTH GEORGIA COMMUNITY HOUSING DEVELOPMENT CORPORATION
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City continually consults with the North Georgia Community Housing Development Corporation (NGCHDC), aka Habitat for Humanity, executives to better understand their needs through their participation as a grant subrecipient. Through continued partnerships with the NGCHDC, the City anticipates improved quality and quantity of services and affordable housing for the homeless and low to moderate income persons.
4	<b>Agency/Group/Organization</b>	Roswell Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City continually consults with Roswell Housing Authority executives to better understand their needs through their participation as a grant subrecipient. Through continued partnerships with the Roswell Housing Authority, the City anticipates improved quality and quantity of services and affordable housing for the homeless and low to moderate income persons.

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

N/A. The City consults with all interested agencies when applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	North Fulton Housing and Homeless Continuum of Care	The City utilizes the input from its valued nonprofits that comprise this continuum.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

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

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

The City of Roswell issued a solicitation for proposals for its Program Year 2021 CDBG funding on September 4, 2020. In an effort to simplify the application process and conserve resources, the City's Annual Action Plan solicitation process was once again hosted entirely online through ZoomGrants.com. The solicitation was posted in the September 2, 2020 Roswell Neighbor and on the City's website. The solicitation closed on September 30, 2020 and the City received 17 proposals requesting over \$1.6 million. The proposals were reviewed by City staff for eligibility and scored by a staff committee. A total of seven projects were recommended and eventually approved by the Roswell Mayor and Council for funding. The City had initially issued the solicitation with an estimated \$500,000 available for funding. On February 25, 2021 HUD notified the City that its official award would be \$470,283. The City responded by only reducing the amount of its Administration and Planning allocation and did not adjust any funding for the other six projects. Then on May 13, 2021 HUD notified the City that it had made an error calculating the 2021 CDBG formula, and the City's final 2021 award would be in the amount of \$477,213. The City again responded by only increasing the amount of its Administration and Planning allocation and did not adjust any funding for the other six projects.

The City opened the public comment period for review of the City's 2021 Annual Action Plan on April 9, 2021. To communicate the availability of the plan, the City ran newspaper ads in the April 7, 2021 Roswell Neighbor and the April 15, 2021 El Nuevo Georgia. The City also posted notices of the plan's availability on the City's website and social media pages. Hard copies of the draft plan were placed at Roswell City Hall and the Roswell Housing Authority, while an electronic copy was available on the City's website. A public hearing was held at Roswell City Hall at 6:00 PM on April 26, 2021 and the public comment period closed on May 10, 2021. No one attended the public hearing and no comments were received.

Please see Appendix A for copies of public notice ads.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	The City ran an ad in the September 3, 2020 Roswell Neighbor opening its application process and advertising the day of an application workshop.	n/a	n/a	
3	Newspaper Ad	Non-targeted/broad community	The City posted notice of the 2021 AAP, public hearing, and means of public comment in the Roswell Neighbor Newspaper on April 7, 2021.	No comments were received.	No comments were received.	
4	Internet Outreach	Non-targeted/broad community	The City posted the draft of its 2021 AAP, notice of hearing, and means of public comment on the City's website on April 9, 2021.	No comments were received.	No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad	Non-English Speaking - Specify other language: Spanish	The City posted notice of the 2021 AAP, public hearing, and means of public comment in Spanish in the bi-weekly El Nuevo Georgia on April 15, 2021.	No comments were received.	No comments were received.	
6	Public Meeting	Non-targeted/broad community	The City presented the recommended 2021 allocations at the public April 16, 2021 Administration and Finance Committee Meeting. The 5:00 PM meeting was advertised and broadcast live on the City's Facebook page.	No comments were received.	No comments were received.	
7	Public Hearing	Non-targeted/broad community	On April 26, 2021 the City held a public hearing for the 2021 AAP in room 220 of City Hall at 6:00 PM.	No comments were received.	No comments were received.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

On May 18, 2021 HUD notified the City that its official 2021 CDBG award allocation had been changed to \$477,213 due to a formula error. If this funding level is maintained through the remaining one year of the City's 2018-2022 Consolidated Plan, the City of Roswell can anticipate another \$477,213 in CDBG funding over the final year of the Consolidated Plan.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	477,213	0	0	477,213	477,213	CDBG funds used throughout the City will leverage other federal, local, and private funds.

**Table 5 - Expected Resources – Priority Table**

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

The City will use a combination of public and private funding to carry out activities identified in this plan. During PY 2021, the City will research opportunities to apply for additional funding streams which are consistent with the goals of the Consolidated 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**

During the PY 2021, the City does not anticipate using publicly owned land or property to address the needs identified in the Annual Action Plan.

**Discussion**

The City has identified seven projects for the use of the 2021 CDBG funding. It plans to issue another solicitation for proposals using an online application process for the 2022 CDBG funds in the fall of 2021.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve access to and quality of housing	2018	2022	Affordable Housing	City-Wide	Affordable Housing	CDBG: \$152,700	Rental units rehabilitated: 26 Household Housing Unit
2	Planning and Administration	2018	2022	Planning and Administration	City-Wide	Administration	CDBG: \$27,213	
3	Housing/services for homeless or at-risk	2018	2022	Affordable Housing Public Housing Homeless	City-Wide	Housing Services for Homeless/At Risk	CDBG: \$0	Homelessness Prevention: 0 Persons Assisted
4	Public Facility Improvements for Low-Mod Clientele	2018	2022	Non-Homeless Special Needs Non-Housing Community Development Public Facility	City-Wide Census Tract 011405-Block Group 3	Public Facility Improvements For Low-Mod Clientele	CDBG: \$254,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1840 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Provide Public Services	2018	2022	Non-Homeless Special Needs Non-Housing Community Development Public Services	City-Wide	Public Services	CDBG: \$42,800	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Improve access to and quality of housing
	<b>Goal Description</b>	The City has allocated \$152,700 to this goal. Enable of Georgia will receive \$82,700 to rehabilitate four group homes for adults with special needs, and Homestretch Inc. will receive \$70,000 to replace roofs and flooring for 22 multi-family housing units on Millbrook Circle.
2	<b>Goal Name</b>	Planning and Administration
	<b>Goal Description</b>	The City of Roswell has allocated \$27,213 to this goal. The funds will go towards partial funding of a Grants Specialist position to oversee the CDBG program; advertising, fair housing education, plan development; and other professional services as required by the program.
3	<b>Goal Name</b>	Housing/services for homeless or at-risk
	<b>Goal Description</b>	The City did not fund any projects for this goal during the 2021 Program Year. While HomeStretch Inc. often uses its housing stock as transitional housing, it is not exclusively transitional, so its project is not included in this computation. In addition, the North Fulton Community Charities is services a large population of homeless persons for the City of Roswell, but it received funding from CDBG-Coronavirus funds for two different projects in the last twelve months.

4	<b>Goal Name</b>	Public Facility Improvements for Low-Mod Clientele
	<b>Goal Description</b>	The City has allocated \$254,500 to this goal. The City of Roswell Public Works Department will receive \$204,500 to replace the Tuxedo Court waterline which will benefit 1,690 LMI persons, and the North Fulton Child Development association will receive \$50,000 to make repairs to the Child Development Center which will benefit 150 LMI children.
5	<b>Goal Name</b>	Provide Public Services
	<b>Goal Description</b>	The City has allocated \$42,800 to this strategic plan goal. Senior Services North Fulton will receive \$30,000 to help fund a transportation program for Seniors to and from health and wellness appointments which will benefit 40 LMI Seniors. The YMCA of Alpharetta will receive \$12,800 to provide after school scholarships to Roswell elementary schools which will benefit 10 LMI children.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

On September 4, 2020 the City of Roswell issued a solicitation for proposals for its Program Year 2021 CDBG funding, estimated at the time to be \$500,000. This amount was later adjusted to reflect the initial official award amount of \$470,283, which was later adjusted to the final official award amount of \$477,213. That solicitation was posted in the September 2, 2020 Roswell Neighbor and on the City's website. The solicitation closed on September 30, 2020 and the City received 17 proposals requesting over \$1.6 million. A staff committee reviewed the proposals and a total of seven projects were selected for funding. Of the total award, the City allocated \$27,213, or six percent, for Administration and Planning costs. The remaining funds in the amount of \$450,000 was made available to eligible organizations through an open application process.

#### Projects

#	Project Name
1	City of Roswell Administration and Planning
2	City of Roswell Public Works Tuxedo Court Water Line
3	Enable Group Home Improvements
4	HomeStretch Millbrook Repairs
5	North Fulton Child Development Association Repairs
6	Senior Services North Fulton TOPS
7	YMCA After School Scholarships

Table 7 - Project Information

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

The City was able to address most of its priority needs using the 2021 CDBG funding. The City did not fund its main homeless provider, North Fulton Community Charities (NFCC) because the City allocated \$400,000 in local private funding to NFCC to help respond to the community's emergency needs during the pandemic. In addition, NFCC was allocated \$75,000 in Round 1 CDBG-CV funding and has been recommended to receive another \$50,000 in Round 3 CDBG-CV funding. While all of this funding goes towards improving the City's affordable housing in 2021, those projects are not part of this plan.

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

1	<b>Project Name</b>	City of Roswell Administration and Planning
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Planning and Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$27,213
	<b>Description</b>	This is administration and planning funds related to oversight of the Community Development Block Grant (CDBG) Program.
	<b>Target Date</b>	12/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable. Planning and administration only.
	<b>Location Description</b>	Not applicable. Planning and administration only.
	<b>Planned Activities</b>	Partial salary for the Grants Specialist that oversee the CDBG program, advertising for public notice, fair housing education efforts, and other professional or technical services related to managing the grant.
2	<b>Project Name</b>	City of Roswell Public Works Tuxedo Court Water Line
	<b>Target Area</b>	Census Tract 011405-Block Group 3
	<b>Goals Supported</b>	Public Facility Improvements for Low-Mod Clientele
	<b>Needs Addressed</b>	Public Facility Improvements For Low-Mod Clientele
	<b>Funding</b>	CDBG: \$204,500
	<b>Description</b>	This project will replace a deteriorating water line on Tuxedo Court in Roswell. The water line is located in an LMI Census Block, 011405.03.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	There are 1,690 LMI households in the Target Block that would benefit from this infrastructure improvement.
	<b>Location Description</b>	Tuxedo Court, Roswell, GA 30075
	<b>Planned Activities</b>	This project will replace 658 linear feet of 6" cast iron water line and 400 linear feet of 2" galvanized steel water line with new 8" ductile pipe. The new line will improve pressure and fire flows in this area and add additional Hydrant.

3	<b>Project Name</b>	Enable Group Home Improvements
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve access to and quality of housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$82,700
	<b>Description</b>	This project will make repairs and improvements to four group homes for LMI adults with special needs.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit four group homes. Each home has four tenants, so the project will benefit 16 LMI individuals.
	<b>Location Description</b>	505 Grimes Place, Roswell, GA 30075 540 Pine Grove Road, Roswell, GA 30075 535 Tollwood Drive, Roswell, GA 30075 1070 Barrington Landing Court, Roswell, GA 30076
<b>Planned Activities</b>	The homes will be updated with new flooring to prevent falls, bathrooms will be renovated to meet ADA standards, wheelchair ramps will be added, garages and car ports will be rebuilt to meet code and prevent falls, and unsafe major appliances replaced. Walls that have cracked will be repaired and sealed, and rooms with old paint, including peeling paint will be repainted with colors designed to mitigate distractions, seizures and irritability.	
4	<b>Project Name</b>	HomeStretch Millbrook Repairs
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve access to and quality of housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$70,000
	<b>Description</b>	This project will replace roofs and flooring in 22 LMI housing units for HomeStretch.
	<b>Target Date</b>	12/31/2021



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The project will benefit 22 LMI families living in the units.
	<b>Location Description</b>	101A Millbrook Circle, Roswell, GA 30075 101B Millbrook Circle, Roswell, GA 30075 102A Millbrook Circle, Roswell, GA 30075 102B Millbrook Circle, Roswell, GA 30075 103A Millbrook Circle, Roswell, GA 30075 103B Millbrook Circle, Roswell, GA 30075 104A Millbrook Circle, Roswell, GA 30075 104B Millbrook Circle, Roswell, GA 30075 105A Millbrook Circle, Roswell, GA 30075 105B Millbrook Circle, Roswell, GA 30075 106A Millbrook Circle, Roswell, GA 30075 106B Millbrook Circle, Roswell, GA 30075 107A Millbrook Circle, Roswell, GA 30075 107B Millbrook Circle, Roswell, GA 30075 108A Millbrook Circle, Roswell, GA 30075 108B Millbrook Circle, Roswell, GA 30075 109A Millbrook Circle, Roswell, GA 30075 109B Millbrook Circle, Roswell, GA 30075 110A Millbrook Circle, Roswell, GA 30075 110B Millbrook Circle, Roswell, GA 30075 112A Millbrook Circle, Roswell, GA 30075 112B Millbrook Circle, Roswell, GA 30075
	<b>Planned Activities</b>	This project includes replacing the roofs, flooring, and necessary appliances to improve these LMI housing units for the families they serve.
<b>5</b>	<b>Project Name</b>	North Fulton Child Development Association Repairs
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Public Facility Improvements for Low-Mod Clientele
	<b>Needs Addressed</b>	Public Facility Improvements For Low-Mod Clientele
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	This project will include repairs to the Child Development Center, which provides early education to LMI children in North Fulton County.
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is estimated to benefit 150 LMI children.
	<b>Location Description</b>	89 Grove Way, Roswell, GA 30075
	<b>Planned Activities</b>	This project includes the replacement of flooring in the West Hall section of the Center and replacing the deteriorating playground surface with a safer and more durable material.
<b>6</b>	<b>Project Name</b>	Senior Services North Fulton TOPS
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Provide Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$30,000
	<b>Description</b>	This project will fund transportation services for Seniors to and from medical and wellness appointments.
	<b>Target Date</b>	5/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is estimated to benefit 40 Roswell Seniors.
	<b>Location Description</b>	The service picks up from and drops off at the riders' houses.
	<b>Planned Activities</b>	This project will fund Senior Services North Fulton's Transportation Options for Seniors (TOPS) Program which takes Seniors to and from necessary medical, health, and wellness appointments.
<b>7</b>	<b>Project Name</b>	YMCA After School Scholarships
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Provide Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$12,800
	<b>Description</b>	This project provides afterschool scholarships to LMI children at Roswell elementary schools.
	<b>Target Date</b>	12/31/2021

<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>This project will provide afterschool scholarships to 10 LMI children.</p>
<p><b>Location Description</b></p>	<p>The YMCA of Alpharetta provides the services at Roswell elementary schools. The specific schools depend on the need when the school year starts.</p>
<p><b>Planned Activities</b></p>	<p>This project funds scholarships to the YMCA of Alpharetta's after school program which provides mentoring, counseling, and homework help to LMI children at Roswell elementary schools.</p>

## **AP-50 Geographic Distribution – 91.220(f)**

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

Despite having some higher concentration areas of minorities or low-income residents, the City utilizes its nonprofits to carry out most of its CDBG activities. Since these nonprofits provide services across Roswell, the City has traditionally not constrained or prioritized these resources based on geography. However, in May 2021 the City submitted a substantial amendment to its Consolidated Plan that designates Census Tract 011405, Block Group 3, as priority target area. According to HUD data, the Block Group is currently comprised of 1,690, or 72 percent, LMI residents.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City-Wide	100

**Table 8 - Geographic Distribution**

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

The City will use HOME and CDBG funds throughout the jurisdiction to serve low to moderate income persons. A portion of HOME and CDBG funds will be used for the rehabilitation of rental housing and to allocate funding to local service providers in the City. This method of allocation will enable the City to serve the most disadvantaged residents given the limited funding available.

As mentioned above, the City mostly utilizes its nonprofits to carry out a large portion of its CDBG activities, and the nonprofits don't restrict their services to any part of the City. However, HUD has identified an LMI Census Block 011405.03, and the City's Public Works Department has identified the major need for water line improvements in the area. The 2021 AAP allocates \$204,500, or 43 percent of the 2021 funding, to the replacement of the Tuxedo Court water line. The project will increase water pressure and fire flows for the 1,690 residents in the area.

### **Discussion**

The City has allocated 57 percent of its 2021 funding to City-wide activities and 43 percent to Census Tract 011405, Block Group 3.

## Affordable Housing

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

#### Introduction

The City has focused its 2021 CDBG funds to rehabilitate existing housing units. HomeStretch Inc.'s project will rehabilitate 22 low to moderate income housing units, providing new roofs and flooring to future residents, and Enable of Georgia will rehabilitate four group homes for adults with Special Needs.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	26
Special-Needs	0
Total	26

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	26
Acquisition of Existing Units	0
Total	26

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

#### Discussion

The Roswell Housing Authority was not funded in this 2021 CDBG cycle. However, it did receive \$75,000 from Round 1 CDBG-CV funding. HomeStretch also received another \$100,000 in Round 1 CDBG-CV funds. Both of those awards went towards improving the City's affordable housing in 2021, but are not part of this plan.

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

### **Introduction**

The Housing Authority of the City of Roswell, also known as the Roswell Housing Authority (RHA), was established in 1950. The RHA's objectives are to assure that the development meets its mission of providing quality low-income housing and to develop experience and capacity to develop and manage LIHTC developments in the future. The Housing Authority of the City of Roswell only offers public housing. It does not administer the Section 8 Housing Choice Voucher Program. The public housing units are located at public housing located on Oak, Myrtle and Grove St in the City on two independent campuses.

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

The Roswell Housing Authority was not allocated 2021 CDBG funding because its proposal did not score high enough during the review period. However, it was awarded \$75,000 for public housing services from Round 1 CDBG-CV funds. City staff is also working with the Housing Authority to leverage HOME funding for a major redevelopment of its campus. The City receives HOME funding through its participation in the Georgia Urban County Consortium (GUCC), led by Cobb County.

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

The RHA operates a tenant council which will provide for unified input into policies and practices of the organization and future planning. The objective of the Council is to review the effectiveness of housing authority policies and practices, make recommendations for expanded tenant services and activities, have opportunity and a position on the agenda of every Commissioner Board meeting, and have input into the redevelopment plans of the housing authority.

Additionally, the City funded a tenant counselor position with 2019 CDBG funds, and the City funded job training and tutoring services for Housing Authority residents with Round 1 CDBG-CV funding.

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

Not applicable. The Roswell Housing Authority is not designated as troubled.

### **Discussion**

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

### **Introduction**

The City's main homeless services provider, North Fulton Community Charities (NFCC), was not funded using 2021 CDBG funds. This is largely because the City received a record high 17 proposals during the application process, and NFCC's proposal did not score high enough. However, the City allocated \$400,000 in private funding to NFCC to help provide emergency assistance to the City's residents during the pandemic, which greatly reduced the financial burdens on at-risk residents. The City also allocated \$75,000 in Round 1 CDBG-CV funding and recommended another \$50,000 in Round 3 CDBG-CV funding for NFCC to assist with job training and employment for homeless and at-risk populations.

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

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

Roswell will continue to work closely with agencies affiliated with the North Fulton Community Coalition. The City will support agencies by providing operating dollars for agencies serving homeless clients. Risk factors for becoming homeless include a history of instability and a dramatic change in income. Since rent in this area is not affordable for some families leaving them with little to save for emergencies.

The City supports the initiatives North Fulton Housing and Homeless Continuum of Care initiatives and projects to address the housing and supportive services of homeless people. The City, through its CDBG allocation supports these local organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. Over the next Consolidated Plan period, the City plans to continue collaborating with various local nonprofits organizations to expand services for the homeless and at-risk of homelessness population.

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

The City of Roswell will continue to support local nonprofits such as North Fulton Community Charities, The Drake House, and the Housing Initiative of North Fulton in addressing transitional housing. Although, the City of Roswell does not receive its own ESG allocation; the city maintains steady support by leveraging its CDBG allocation to provide foundational support to these organizations. These organization are eligible to receive ESG support through Fulton County who receives a direct allocation to provide essential services and operations to emergency shelters and transitional housing facilities. These facilities provide shelter and services to citizens of Fulton County including Roswell to include homeless families, single men and women, and survivors of domestic violence. The City and County supports increasing housing options and self-sufficiency for the homeless and near homeless by

supporting transitional housing.

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

The City regularly collaborates with the North Fulton County Housing and Homeless Continuum of Care, is a nine-member coalition of local non-profit organizations bound by a memorandum of understanding to help individuals, children, and families facing housing crises. The City works closely with CoC member organizations to provide foundational support for these organizations to be able to continue to provide needed services to the residents of the Roswell community. The CoC has been an advocate for the Roswell Housing Authority's vision for redevelopment of the Groveway neighborhood. The City also supports initiatives brought forth through the CoC and the Roswell Georgia Initiative for Community Housing team's effort to increase homeownership.

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

Public systems or institutions (i.e. jails, prisons, hospitals, child welfare, mental health facilities, etc.) often release individuals directly into homelessness. For homeless families with children, a centralized intake is in place that seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. The North Fulton Housing and Homeless Continuum of Care Discharge Planning Workgroup will continue to work closely with hospitals to make sure that hospital social workers have appropriate discharge protocols and are not routinely discharging patients to the streets or emergency shelter.

## **Discussion**



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

### **Introduction:**

The City's housing market presents significant impediments to development of an adequate supply of affordable housing for low to moderate-income people. Loss of major manufacturing employment opportunities coupled with rising construction costs has created a significant barrier to affordable housing. The City's Analysis of Impediments (AI) to Fair Housing Choice (2017) examined a number of areas in which barriers to the development of affordable housing might exist. Barriers identified in the AI and over the course of the outreach for the development of this Consolidated Plan, include:

- There is a continuing need to educate renters and homebuyers about their rights under the Fair Housing Act and to advise realtors, sellers, landlords, mortgage brokers, and the public in general about the Fair Housing Act and their obligations under the Act.
- About a quarter (24.7%) of the existing homeowners in Roswell are spending more than 30% of their total income on housing cost, which makes them cost burdened. Almost half (49.8%) of the existing renter households in Roswell are spending more than 30% of the total income on housing, which makes them cost burdened.
- There is a lack of economic opportunities in the City, which prevents lower-income households from increasing their income and thus their housing choice. The cost of housing in the City limits housing choice for government and public service employees.
- Public policies such as building codes and zoning ordinances need to be annually reviewed. Furthermore, these policies affect the construction and rehabilitation of housing in the community and determine occupancy requirements, locations, and density of housing.

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

Please see Appendix B for the City's planned actions to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

### **Discussion:**

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

### **Introduction:**

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

The following describes the planned actions or strategies that the City of Roswell will pursue in the next year to

- Address underserved needs
- Foster and maintain affordable housing
- Evaluate and reduce lead-based paint hazards
- Reduce the number of poverty-level families
- Develop institutional structure
- Enhance coordination

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

The City will use HOME funds and a portion of CDBG funds for new affordable housing initiatives and to rehabilitate existing housing units. The special needs population will be served through grants to local service providers. The homeless population will be served through assistance grants to local service providers.

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

According to the American Community Survey, 12 percent of Roswell's housing units were built before 1978. In order to address lead-based paint hazards the City adheres to the Residential Lead-Based Paint Hazard reduction Act of 1992 in federally assisted housing. The City requires disclosure of known information on lead-based paint hazards before the sale or lease of housing built before 1978. The City will continue to implement city codes and regulations to protect its citizens from lead-based paint hazards which is integrated through purchasing policies and code enforcement.

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

The City of Roswell works closely with the Georgia Department of Labor, and the Fulton County Workforce Development Program. The City direct residents to these agencies for educational, workforce readiness, employment services, and small business development. The City will also explore ways to partner with other organizations in the community who work to promote financial literacy and reduce the number of persons in poverty.

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

The City recognizes the need to maintain a high level of coordination on projects involving all its departments, County departments, and/or non-profit organizations. This collaboration guarantees an efficient use of resources with maximum output in the form of accomplishments.

The City will address gaps and improve institutional structure by using the following strategies:

- Reduce and/or alleviate any gaps in services and expedite the delivery of housing and community development improvements to eligible persons.
- Evaluate the procurement process and guidelines for all rehabilitation and construction projects.
- Coordinate projects among City departments and support ongoing efforts for City initiatives.
- Maintain a strong working relationship with the Roswell Housing Authority based on the mutually shared goal of providing suitable housing for low- and extremely low-income persons.
- Work with and financially support local nonprofits operating in low- and moderate-income neighborhoods to build affordable housing for the elderly, veterans and other special needs populations.
- Use established lines of communication to identify opportunities for joint ventures with agencies that provide funding to construct affordable housing and/or finance homeownership opportunities.

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

The City of Roswell will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its citizens. By continuing to collaborate with the North Fulton Community Coalition, the community will continue to streamline the actions of public service agencies to improve the lives of all persons in Roswell. These groups address a broad range of needs for families including homelessness, public safety, workforce development, literacy, and allocation of other resources. The support of this coalition allows local non-profit organizations to focus their efforts collectively and to avoid duplication of services within the City.

### **Discussion:**

## Program Specific Requirements

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

#### Introduction:

The City doesn't anticipate any program income from this program year. The City has also not participated in any loan programs through HUD.

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

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

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

This 2021 Annual Action Plan covers projects related to the City's 2021 Program Year allocation. The City estimates that 82 percent of the funds will be used to directly benefit low to moderate income persons. The City's projects are not generating any program income, and no funds were or are to be used for Section 108 or urban renewal settlements. Additionally, no funds have been returned to the City's line of credit.

## Attachments

## Citizen Participation Comments

### Citizen Participation Comments

No comments were received.



**Citizen Participation Plan**  
Community Development Block Grant (CDBG) Program  
(Revised 7-1-20)

City of Roswell  
Grants Division  
38 Hill Street, Ste. 115  
Roswell, GA 30075  
Phone: 770-641-3727



## Citizen Participation Plan 9-20-17 (Revised 7-1-20)

### Introduction

The City of Roswell, Georgia Citizen Participation Plan (CPP) was prepared in accordance with Section 104(a)(3) of the Housing and Community Development Act of 1974, as amended. The 24 CFR 91.105 federal regulations outline the "citizen participation" requirements. This document has been established in order for the City of Roswell, Georgia to comply with the requirements of these regulations.

### Applicability and Adoption of the Citizen Participation Plan

The CPP sets forth the City's policies and procedures for attaining citizen input, participation, and comment on the federally-funded Community Development Block Grant Program (CDBG). Citizen input regarding the use of federal funds received annually from the U.S. Department of Housing and Urban Development (HUD) is vital; therefore, this CPP will have an open comment period along with a public hearing prior to the City's adoption.

To successfully manage the City's CDBG program, citizen input is necessary in the following areas:

- Citizen Participation Plan and amendments to the Citizen Participation Plan;
- A Five-Year Consolidated Plan (Con Plan);
- An Annual Action Plan (AAP);
- Fair Housing Plans;
- Annual Performance Reports; and
- Substantial Amendments to the Consolidated Plan or Annual Action Plan.

The City will seek input from civic organizations, citizens, housing and human service agencies, the county school system, and other groups as necessary to assist in fully engaging the community in the planning and implementation of this federal program. Additionally, all CDBG information will be placed on the City's website and an e-mail address will be established to serve as a gateway for all questions and comments relative to the program. All draft documents will be placed on the City's website, in the Grants Division, at the Roswell Public Library, the East Roswell Public Library, and the Roswell Housing Authority. The Grants Division will also post notices of meetings on the City's online calendar, Facebook, and NextDoor.

### REVISION 7-1-20

In an effort of maintain safety during the 2020 coronavirus pandemic, HUD has issued a series of waivers regarding public notification requirements. Those waivers allow a temporary reduction of the public comment period length and the mediums for outreach. On June 24<sup>th</sup>, 2020 the City notified HUD of its intent to use those waivers. Until further notice, the City has reduced the public comment period for plan substantial amendments to five days, and it is limiting its public outreach to electronic platforms: the City of Roswell's website, Facebook, and NextDoor. More details can be found in the letter of intent from the City Administrator included at the end of this revised document.

Roswell Citizen Participation Plan - 1

#### Consolidated Plan/Annual Action Plan

Based on population, the City of Roswell is considered an entitlement community. The CDBG entitlement program allocates annual grants to assist in the development of viable communities by providing decent housing, a suitable living environment, and to expand economic opportunities, principally for low and moderate income persons. To receive an annual allocation of federal funds from HUD, the City is required to create a five-year Consolidated Plan (strategic plan) with a one-year Action Plan. Subsequently, the five-year Plan will be updated with Annual Action Plans for years two through five. The Consolidated Plan includes the amount of assistance City expects to receive and the range of activities that may be undertaken including the estimated benefit to persons of low- and moderate-income. The Annual Action Plans are required to include project or program specifics, such as, location, cost, proposed outcome, and any additional descriptive information. Primarily, federal regulations require that funds be aimed where the greatest benefit may be attained for low- and moderate-income residents.

To acquire ample public engagement in all aspects and phases of Plan development, the City of Roswell will interact with various stakeholders in meetings, workshops, public hearings, and with written correspondence. Additionally, the City will inform the Roswell Housing Authority (RHA) when the Consolidated Plan may impact any public housing development or the surrounding community so that the agency may include the City's information in its Annual Comprehensive Grant Program application. Prior to the adoption of the Consolidated Plan/Action Plan, a 30 calendar day public comment period will be observed. All comments will be recorded and considered in the formulation of the Plan. In addition, all comments and responses will be included in the appendix of the Plan and will be forwarded to HUD upon adoption.

Roswell Citizen Participation Plan - 2

**Public Comment, Public Notice, Public Advertisement, and Public Hearings**

Public input will be integral in the preparation of the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, substantial amendments, and Annual Performance Report. To that end, the following timeline for participation has been established:

Public Meetings/Input	Date
Publicize draft of CPP, Con Plan, and AAP; and open public comment period	9-20-17
Public Hearing at City Hall to discuss drafts*	10-5-17
Close public comment period	10-23-17
Present drafts to Community Development and Transportation Committee**	10-25-17
Adopt plans at the Mayor and City Council Meeting***	11-13-17
Submit plans to HUD	11-15-17

\* The hearing will be held at City Hall in room 220 at 3:00 p.m.

\*\* This meeting will be held at City Hall in room 220 at 8:00 a.m.

\*\*\* This meeting will be held in the City Hall Council Chambers at 7:00 p.m.

**Plan Amendments**

HUD regulations require that the City define the criteria that trigger an amendment to adopted plans. Amendments could be necessary due to a change in purpose, scope, budget or other reasons. HUD allows flexibility in the City's determination of a substantial amendment. The City of Roswell has defined a substantial amendment to the Consolidated Plan or Annual Action Plan as follows:

1. Any funding in the Annual Action Plan or Consolidated Plan that increases or decreases funding by 60 percent;
2. Any addition of a new priority, project, or program not previously considered; or
3. Any change that reallocates CDBG funds from one eligible activity to another.

The process shall follow the public notice and comment policies described in the Citizens Participation Plan (CPP) when a revision to an adopted Consolidated Plan or Annual Action Plan triggers a substantial amendment. Substantial amendments are also subject to a 30-day review and comment period.

All comments received by the City relating to substantial amendments shall be considered when preparing the amendment. All comments and the outcome of the City's consideration shall be included at the time of adoption by the City of Roswell. All substantial amendments will be forwarded to HUD as an attachment/appendix to the amended Consolidated Plan or Annual Action Plan.

Other amendments may be implemented at the discretion of the Mayor or City Administrator and are not subject to the defining criteria that apply to substantial amendments.

### Performance Reports

Prior to submittal of the Consolidated Annual Performance Report (CAPER) to HUD, the report will be made available to interested parties for a comment period of no less than 15 calendar days. Citizens will be notified of the CAPER's availability through newspaper notification in the Roswell Neighbor and on the City website at [www.roswellgov.com](http://www.roswellgov.com). Written comments will be considered and will be attached with responses as an appendix to the final CAPER.

### Access to Information and Public Involvement

To encourage and foster citizen input in the development of the Citizen Participation Plan, amendments to the Citizen Participation Plan, the five-year Consolidated Plan, the Annual Action Plan, Performance Reports, and substantial amendments to the Consolidated Plan or Annual Action Plan, the City of Roswell will make all information available for public comment. Upon request, all aforementioned information may be provided in alternative formats for the disabled and to non-English speaking residents. All documents will be subjected to public input prior to submission to HUD.

A minimum of two public hearings must be held each program year to seek public input and address housing and community development needs, development of proposed activities and review program performance. This process will ensure that the City of Roswell follows the Plan and incorporates public input so that community needs are met with appropriate application of HUD funds. These public hearings will be held in different stages of the program year, and one will be held before the Consolidated Plan/Annual Action Plan is published for public comment. The Action Plan will include CDBG funds or any other HUD funds that the City expects to receive each year with the estimated benefit to low- and moderate-income residents.

To ensure access to all information, at a minimum, an executive summary of all documents will be placed on the City of Roswell's website, [www.roswellgov.com](http://www.roswellgov.com). Hard copy documents will be available at:

City of Roswell  
Grants Division  
38 Hill Street., Suite 115  
Roswell, Georgia 30075

Roswell Housing Authority  
199 Grove Way  
Roswell, GA 30075

East Roswell Public Library  
2301 Holcomb Bridge Road  
Roswell, GA 30076

Roswell Public Library  
115 Norcross Street  
Roswell, GA 30075

Reasonable and timely access will be given to public records including the City's use of assistance for the preceding five years. The City will provide a reasonable number of free copies of each document with sufficient notice. A request for a copy can be made by contacting [cdbg@roswellga.com](mailto:cdbg@roswellga.com) or by contacting the CDBG Program at 770-641-3727.

Roswell Citizen Participation Plan - 4

### Communication Accommodations

Translation and Interpreter services will be made available upon request five working days prior to the scheduled meeting. Please contact the CDBG Program at 770-641-3727 or email [cdbg@roswellgov.com](mailto:cdbg@roswellgov.com). Hearing impaired persons who wish to participate in public hearings and who require an ASL translator, should contact the Georgia Relay Department at 800-359-4663 at least five working days prior to the public hearing date.

Public notice will be posted at least 15 days before a public hearing in the Roswell Neighbor, on the City's website at [www.roswellgov.com](http://www.roswellgov.com).

Citizens who may require this information in alternative formats may contact the CDBG Program at 770-641-3727 at least five working days prior to the public hearing date to permit the department to make arrangements to have translation services available for the public hearing(s) in question.

### Displacement

Federal Regulation 24 CFR Part 91.105 (b)(1) requires that the City describe how it will address displacement of residents due to the result of any HUD-funded project or program. The City is required to identify how any displaced person, as a result of a HUD-funded project or program, will be assisted even if the City anticipates no displacement. Although the City does not anticipate displacement during this 5-year Plan, every effort will be undertaken to minimize displacement. The City will develop a policy regarding displacement prior to commencing any federally funded activity that may result in displacement. In the event displacement should occur, then 49 CFR Part 24 (Uniform Relocation Act) will be followed.

### Technical Assistance

Technical assistance may be requested in writing by any persons of low- and moderate-income or groups representing such persons as it relates to developing proposals for funding assistance under any program outlined by the Consolidated Plan. The level and type of assistance needed will be determined by the City of Roswell. All technical assistance requests should be addressed to:

City of Roswell  
Grants Division  
38 Hill Street, Suite 115  
Roswell, Georgia 30075

All requests should specify the name of the individual or citizen group/organization, the contact person, and the nature of the technical assistance requested.

### Complaint Procedure

The City of Roswell desires and encourages continuous citizen feedback and community input related to this CDBG federal program and all federal programs administered by the City. All concerns or complaints related to the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, Annual Performance Report, and any substantial amendments should be submitted in writing to the CDBG Program Director. Written complaints may be submitted to:

City of Roswell  
Grants Division  
38 Hill St., Suite 115  
Roswell, Georgia 30075

Concerns, complaints, questions, or requests for information may also be submitted electronically to [cdbg@roswellgov.com](mailto:cdbg@roswellgov.com). All written and electronically submitted correspondence received by the City of Roswell will be addressed in writing within 15 working days, where practicable, as required by federal regulations.

## Grantee Unique Appendices

### Appendix A - Participation

Ad Copy from 2021 Solicitation for Proposals

#### **CITY OF ROSWELL COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM 2021 SOLICITATION FOR PROPOSALS**

The City of Roswell will begin accepting applications for Community Development Block Grant (CDBG) funding for the 2021 Program Year on September 4<sup>th</sup>, 2020. The City estimates that its allocation amount from the U.S. Department of Housing and Urban Development (HUD) will be \$500,000. The City has allocated \$450,000 of that amount to the competitive grant application process referenced herein. The goal of the City of Roswell's CDBG program is to benefit low and moderate income persons (as defined by HUD) by providing decent housing and a suitable living environment as well as expanding economic opportunities for low income persons. Eligible activities range from housing rehabilitation to public services as well as economic development and infrastructure projects.

All proposed projects must qualify as an eligible activity (as defined by 24 CFR Part 570, Subpart C) **AND** meet one of the following national objectives: 1) primarily benefit low income persons; 2) be of an urgent and otherwise non-fundable need; or 3) prevent or eliminate slum/blight. However, because the City has not officially designated any slum or blight areas nor identified any urgent needs, only proposals that address the first national objective of "**primarily benefiting low income persons**" will be considered. Along with the national objectives, the Mayor and City Council have identified four funding priorities for the CDBG program: 1) Improve access to, and quality of housing; 2) Housing services for homeless or persons at-risk of being homeless; 3) Public facility improvements in low-income areas; and 4) Public services. The City has also decided to include an optional grant match to increase partnerships within the City and maximize the benefits of the CDBG funds. It is not a requirement for project requests to meet one of the Mayor and City Council's priorities or to include a grant match, but both are encouraged and will be taken into consideration when evaluating applications.

**Applications are due no later than 5:00 p.m. EST on September 30<sup>th</sup>, 2020.** In an effort to simplify the application process and conserve resources, the City's CDBG application process will once again be conducted online. After all applications are received, designated reviewers will evaluate each proposal for eligibility and present the results to Mayor and City Council for approval. If approved, the projects will be included in the City's 2021 Annual Action Plan (AAP) which will then be submitted to HUD. The City estimates that HUD's approval of the AAP and the necessary Congressional funding will not be available for reimbursement until May 2021.

*For more information about program objectives and eligible activities, see HUD's CDBG Desk Guide located on the City's website <http://www.roswellga.gov/home/showdocument?id=4858>. If you have any questions or comments about the CDBG application process, please contact Charles Alford, Grants Specialist for the City of Roswell, at (770) 641-3847, [calford@roswellga.com](mailto:calford@roswellga.com).*

# Metro Atlantans talk about job changes amid COVID-19

By Everett Catts  
@everettcatts

Chris Perez was working as a Delta Air Lines flight crew scheduler for flight attendants in Los Angeles when it was laid off due to the COVID-19 pandemic, which has decimated that industry.

"It's tough," the Virginia resident said. "I was only there for three months. I was the last one here before the shutdown. I came in and started training in December and was on the floor after six weeks of training. Then an email saying from China when COVID started coming, the department got pretty crazy and things got hectic."

Perez was unemployed until July, when he started a new job with Atlanta inventory manager for Pool Scouts, a Virginia Beach, Virginia-based pool cleaning franchise owned by Dan Franchi and Brian Bland. He is one of three metro Atlanta residents in the Neighbor newspaper who are sharing not only their job but their reactions during the pandemic.

Perez was able to get the Pool Scouts position through a recommendation he had made with Braden Pugh, who he had worked with previously when doing maintenance marketing for Maple Leaf, a search engine optimization (SEO) agency starting in the fall work shortly after graduation from college.

He is a local franchisee with One Fresh, a carpet-cleaning business that signed an agreement with Franchi Capital, an Atlanta-based private equity firm that also bought two metro Atlanta franchise units from Pool Scouts. Perez also had previously worked with Franchi's Christian Phil at Map/Leaf.

"I've only cleaned the pool in my house before," he said. "The learning curve is huge, but it's something that was planned for by the partners. If they wanted to see someone with good cleaning skills, they could hire. But they hired someone with a strong character, work ethic and integrity."

"All the pool skills are transferable, but when it comes down to providing the service and seeing about the service you provide for the client is the most important thing. Not

anyone needs for an occupation as much as we do."

May, a Miller residents Lee and Joyce Hilde bought Hand and Stone Massage and Facial Spa's Franchise in Sandy Springs, a franchise that is part of the Franchise 500. Franchise 500 is a list of the top 500 franchise companies in the United States and Canada.

Lee has worked for more than six years in the corporate world as an executive, business consultant and salesman in multiple industries, most notably in global growth office for Apple, a tech startup-based, C.P.A.-and business advisory firm. His wife spent more time as an entrepreneur, working as a sales at Emory St. Joseph's Hospital in Sandy Springs, before becoming a stay-at-home mom for their two children, who today are adults.

"It was a big sell, but with COVID, especially with everything that happened with that," she said, "the rest of the sale they were taking with the new franchise. That's why I had to leave home but I have had the law and I have been married 30 years, so I know how to operate. We're both hands on, we're both hard workers. So I love it."

But Lee, the change to Hand and Stone wasn't that big of a risk given he had taken some previous steps, leaving IBM to help fund a new business, a startup that specialized in business consulting, business risk, and technology implementation. It went public two years after its inception and today is The Market Group.

"I can handle the opportunity as part of a complete solution where we acquired others and others acquired us, so it's kind of what is that," he said. "Risk taking is a very, very personal thing. I think the first time or two that you do it, you have some nerves, but you have some instant feedback to say, 'I'm a do something. And by the way, I did it because what it is, it's right in my skin. The way that's kind of been my driving mentality."

The couple own about a year and a half researching and interviewing with franchisees before deciding on Hand and Stone, which runs their network of a business in the health and wellness industry



From left, Lee and Joyce Hilde bought Hand and Stone Massage and Facial Spa's Sandy Springs location despite taking a leap into the spa industry.



Chris Perez was hired as the north Atlanta territory manager for Pool Scouts after being laid off from his position as an in-flight crew member for flight attendants with Delta Airlines.

franchise owner that you worked."

"It was really exciting for me because I knew this was really the opportunity I could just go immediately to take."

Through the ownership has changed, the Franchise 500 rank of the franchise has declined, but Perez said that "now it's a good place." Lee said, "She and I still have been very positive."

"There were starting to get to know our customers," Lee said. "The more is really happy... It makes all the difference in the world to have an element owned. It's really, really critical in this business."

Perez, who is managing a territory that includes Sandy Springs, Alpharetta, Johns Creek and Kennesaw, is looking to have more staff as Pool Scouts grows locally.

"Hanging into business was not like a gambler and the opportunity to grow was. I just had an interest in it," he said. "I was glad it was able to get it. But Chris and I were believed in it as based on the work I'd done for them."

For more information, visit [www.poolscouts.com](http://www.poolscouts.com) or [www.handandstone.com](http://www.handandstone.com).



Brandywine Elementary School received 100 school supplies kits.

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children and supply consisting of 100 school supplies kits to be used in our schools. Annual assembly received as gifts. Brandywine Elementary received 10 kits. Brandywine Elementary received 10 kits and 100 school supplies kits.

## Pet Adoption Spotlight: Bruno Mars

By Everett Catts  
@everettcatts

Like an Animal Project rescuee Bruno Mars for the Pet Adoption Spotlight.

It's hard to believe when you don't recognize him. He's bright and energetic and full of life. Bruno Mars is a friendly and handsome 2-year-old boy who gets along well with other dogs and loves to play with his owner and I mean his owner.

This sweet guy is also a good listener who really takes it in. He's so well-behaved for a rescuee. Bruno Mars has had back-chains and lots of training, and you'll get the perfect young dog Bruno Mars. To see more information about adopting him, email [info@petadoption.com](mailto:info@petadoption.com).



Bruno Mars

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**CITY OF ROSWELL**  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM  
2021 SOLICITATION FOR PROPOSALS

The City of Roswell will begin accepting applications for Community Development Block Grant (CDBG) funding by the 2021 Program Year on September 15, 2020. The City estimates that it will award funding from the U.S. Department of Housing and Urban Development (HUD) for 2021. The City has allocated \$100,000 of that amount to the Community Development Block Grant program. The goal of the City's annual CDBG program is to benefit and assist low-income persons and families in need of housing, decent housing and a suitable living environment as well as expanding economic opportunities for low-income persons. Eligible activities range from housing rehabilitation projects to services to assist in economic development and job training projects.

Eligible projects must be in an eligible activity as defined by HUD (Section 108, Subpart 1). HUD requires that the following activities be eligible: 1) Publicly owned housing projects; 2) Publicly owned and operated non-housing uses; 3) Economic development projects; 4) Community development projects; 5) Publicly owned and operated non-housing uses; 6) Publicly owned and operated non-housing uses; 7) Publicly owned and operated non-housing uses; 8) Publicly owned and operated non-housing uses; 9) Publicly owned and operated non-housing uses; 10) Publicly owned and operated non-housing uses.

Applications are due by 5:00 p.m. EDT on September 30, 2020. For an application form and information, please visit the City's website at [www.cityofroswell.com](http://www.cityofroswell.com). For more information, please contact the City's Community Development Department at 770-455-1413 or visit the City's website at [www.cityofroswell.com](http://www.cityofroswell.com).



**PUBLIC HEARING NOTICE**

**THE CITY OF ROSWELL SEEKS PUBLIC COMMENT ON ITS FFY2021 ANNUAL ACTION PLAN**

On Friday April 9, 2021 the City of Roswell will begin seeking public comment on its Federal Fiscal Year 2021 Annual Action Plan (AAP). As an entitlement community eligible to receive assistance under the U. S. Department of Housing and Urban Development (HUD), the City is required to submit the Annual Action Plan to HUD every year in order to receive funding from the Community Development Block Grant (CDBG) Program. This plan provides a framework for identifying housing and community development priorities and addresses how these priorities can be assisted using federal formula block grant programs.

To ensure access to all information but also adhere to COVID-19 safety regulations, a draft of the document will be made available on the City of Roswell's website: [www.roswellgov.com/cdbg](http://www.roswellgov.com/cdbg). If the following facilities are reopened to the public while the public comment period is still open, hard copies of the draft will be made available at:

City of Roswell  
38 Hill St., Suite 115  
Roswell, Georgia 30075

East Roswell Public Library  
2301 Holcomb Bridge Road  
Roswell, GA 30076

Housing Authority of the City of Roswell  
199 Grove Way  
Roswell, Georgia 30075

Roswell Public Library  
115 Norcross Street  
Roswell, Georgia 30075

Per the City's Citizen Participation Plan, the public comment period for the draft of this plan will run for 30 days, starting on Friday April 9, 2021. All comments must be submitted by 5:00 p.m. on Monday May 10, 2021. Public comments can be submitted in writing to the City of Roswell Grants Division, 38 Hill Street, Suite 130, Roswell, GA 30075 or through the City's CDBG Program email: [CDBG@roswellgov.com](mailto:CDBG@roswellgov.com).

The public will also have an opportunity to comment on the plan at a Public Hearing on Monday April 26, 2021 at 6:00 p.m. in 220. The Roswell City Hall facilities are anticipated to be open at this time. If this changes due to pandemic restrictions, the City will conduct the meeting virtually with a link to the meeting being posted at [www.roswellgov.com/cdbg](http://www.roswellgov.com/cdbg). Please contact Charles Alford, (770) 641-3847, [calford@roswellgov.com](mailto:calford@roswellgov.com), with any questions or if translation or interpretation services are needed.

4/9/21 City of Roswell Website Post Public Comment and Hearing

roswell.gov/government/departments/administration/grants/community-development-block-grants

### PUBLIC HEARING NOTICE

#### The City of Roswell seeks public comment on its FFY2021 Annual Action Plan

On Friday, April 9, 2021, the City of Roswell will begin seeking public comment on its Federal Fiscal Year 2021 Annual Action Plan (AAP). As an entitlement community eligible to receive assistance under the U. S. Department of Housing and Urban Development (HUD), the City is required to submit the Annual Action Plan to HUD every year in order to receive funding from the Community Development Block Grant (CDBG) Program. This plan provides a framework for identifying, setting and summarizing development priorities and activities and how these priorities can be addressed using federal funds to block grant programs.

To ensure access to all information but also adhere to COVID-19 safety regulations, a draft of the document will be made available on the City of Roswell's website [www.roswell.gov/community](http://www.roswell.gov/community). If the following facilities are reopened to the public while the public comment period is still open, hard copies of the draft will be made available at:

City of Roswell  
38141 St. Julie Lane  
Roswell, Georgia 30076

East Roswell Public Library  
2301 Holcomb Ridge Road  
Roswell, GA 30076

Hearing Authority of the City of Roswell  
196 Grove Way  
Roswell, Georgia 30076

Roswell Public Library  
115 Norcross Street  
Roswell, Georgia 30076

For the City's Citizen Participation Plan, the public comment period for the draft of this plan will run for 30 days, starting on Friday, April 9, 2021. All comments must be submitted by 5:00 p.m. on Monday, May 10, 2021. Public comments may be submitted in writing to the City of Roswell Grants Oversight, 48-411 Street, Suite 1-40, Roswell, GA 30076 or through the City's Email Program email: [CDDBG@roswell.gov](mailto:CDDBG@roswell.gov).

The public will also have an opportunity to comment on the plan at a Public Hearing on Monday, April 26, 2021 at 6:00 p.m. in 220 The Roswell City Hall facilities are anticipated to be open at this time. If this changes due to pandemic restrictions, the City will conduct the meeting virtually with a link to the meeting being posted at [www.roswell.gov/community](http://www.roswell.gov/community). Please contact Chris Allen, (770) 641-1647, [allen@roswell.gov](mailto:allen@roswell.gov) with any questions or if accommodations or interpretation services are needed.



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**AVISO DE AUDIENCIA PÚBLICA**

**LA CIUDAD DE ROSWELL BUSCA COMENTARIOS DEL PÚBLICO  
SOBRE SU PLAN DE ACCIÓN ANUAL PARA EL FFY2021**

El viernes 9 de abril de 2021, la ciudad de Roswell comenzará a buscar comentarios públicos sobre su Plan de acción anual (AAP) del año fiscal federal 2021. Como una comunidad de derecho elegible para recibir asistencia bajo el Departamento de Vivienda y Desarrollo Urbano de los EE. UU. (HUD), la Ciudad debe presentar el Plan de Acción Anual a HUD cada año para recibir fondos del Programa de Subvenciones en Bloque para el Desarrollo Comunitario (CDBG). Este plan proporciona un marco para identificar las prioridades de desarrollo comunitario y de vivienda y aborda cómo estas prioridades pueden ser asistidas usando programas federales de subvenciones en bloque.

Para garantizar el acceso a toda la información, pero también cumplir con las normas de seguridad COVID-19, un borrador del documento estará disponible en el sitio web de la ciudad de Roswell: [www.roswellgov.com/cdbg](http://www.roswellgov.com/cdbg). Si las siguientes instalaciones se vuelven a abrir al público mientras el periodo de comentarios públicos aún está abierto, las copias impresas del borrador estarán disponibles en:

Ciudad de Roswell  
38 Hill St., Suite 115  
Roswell, Georgia 30075

Biblioteca Pública de East Roswell  
2301 Hojcomb Bridge Road  
Roswell, GA 30076

Autoridad de Vivienda de la Ciudad de Roswell  
199 Grove Way  
Roswell, Georgia 30075

Biblioteca pública de Roswell  
115 Norcross Street  
Roswell, Georgia 30075

Según el Plan de Participación Ciudadana de la Ciudad, el periodo de comentarios públicos para el borrador de este plan tendrá una duración de 30 días, a partir del viernes 9 de abril de 2021. Todos los comentarios deben enviarse antes de las 5:00 p.m. el lunes 10 de mayo de 2021. Los comentarios del público pueden enviarse por escrito a la División de Subvenciones de la Ciudad de Roswell, 38 Hill Street, Suite 130, Roswell, GA 30075 o a través del correo electrónico del Programa CDBG de la Ciudad: [CDBG@roswellgov.com](mailto:CDBG@roswellgov.com).

El público también tendrá la oportunidad de comentar sobre el plan en una audiencia pública el lunes 26 de abril de 2021 a las 6:00 p.m. en 220. Se prevé que las instalaciones del Ayuntamiento de Roswell estén abiertas en este momento. Si esto cambia debido a restricciones pandémicas, la Ciudad llevará a cabo la reunión virtualmente con un enlace a la reunión que se publicará en [www.roswellgov.com/cdbg](http://www.roswellgov.com/cdbg). Comuníquese con Charles A Ford, (770) 641-3847, [caford@roswellgov.com](mailto:caford@roswellgov.com).



### V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the City of Roswell to affirmatively further fair housing in the community. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. Several aspects of the previously identified impediments are still present in the City of Roswell, despite the City's best efforts, and based on economic conditions, will continue to be addressed by the City of Roswell. Below is a list of impediments that were developed as part of Roswell's 2017 Analysis of Impediments to Fair Housing Choice.

#### A. Impediments to Fair Housing Choice

- **Impediment 1: Fair Housing Education and Outreach**

There is a continuing need to educate renters and homebuyers about their rights under the Fair Housing Act and to advise realtors, sellers, landlords, mortgage brokers, and the public in general about the Fair Housing Act and their obligations under the Act. Overall, there is a need to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities, and the disabled population.

**Goal:** Improve knowledge and awareness of the Fair Housing Act, related housing and discrimination laws, regulations, and the requirements to affirmatively further fair housing in the community.

**Strategies:** In order to address this goal, the following activities and strategies should be undertaken:

- **1-A:** Outline the procedures and process to report or file a fair housing complaint.
- **1-B:** Publicize the procedures and process in the local newspaper; post in public buildings, social service agencies' offices, and print out fliers to pass out.



- **1-C:** Develop opportunities to educate tenants, landlords, sellers, and mortgage brokers.
- **1-D:** Establish an arbitration process for fair housing complaints which are filed on the basis of refusal to make reasonable accommodations.
- **1-E:** Review and improve the rate of underwriting approval for minorities and persons of Hispanic origins in mortgage loan approvals as evidenced by the Home Mortgage Disclosure Act (HMDA) data.
- **1-F:** All essential documents, forms, and directions should be printed in English and Spanish, and a reference sheet in multiple languages should be attached to inform non-English speaking persons who to contact.

• **Impediment 2: Continuing Need for Affordable Housing**

The median value and cost to purchase a single-family house in the City of Roswell that is decent, safe, and sound is \$297,000; this limits the choice of housing for a 4-person family in Roswell, where the median household income is less than \$82,150. About a quarter (24.7%) of the existing homeowners in Roswell are spending more than 30% of their total income on housing cost, which makes them cost burdened. Almost half (49.8%) of the existing renter households in Roswell are spending more than 30% of the total income on housing, which makes them cost burdened.

**Goal:** Promote the development and rehabilitation of various types of housing that is affordable to lower income households.

**Strategies:** In order to address this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to support and encourage plans from both private developers and non-profit housing agencies to develop, construct, and/or rehabilitate affordable housing in the City.
- **2-B:** Encourage the development, construction, and/or rehabilitation of mixed-income housing in the City.



- **2-C:** Survey the existing residential, mixed-use residential / commercial, and vacant structures to better utilize space for additional housing.
- **2-D:** Provide financial assistance to seniors and lower-income households in the City for home improvements so they can remain in their residences.
- **2-E:** Develop a housing rehabilitation program with low-interest loans/grants in lower-income neighborhoods where there is the highest percentage of vacant and deteriorated housing.
- **2-F:** Encourage the development and/or rehabilitation of workforce housing for income-eligible City employees and other City residents.

• **Impediment 3: Economic Opportunities to Improve Housing Choice**

There is a lack of economic opportunities in the City, which prevents lower-income households from increasing their income and thus their housing choice. The cost of housing in the City limits housing choice for government and public service employees.

**Goal:** New affordable housing choices will be available to City employees and lower-income households to make it financially feasible for them to live in the City of Roswell.

**Strategies:** In order to address this goal, the following activities and strategies should be undertaken:

- **3-A:** Strengthen partnerships between public and private entities to encourage economic development, improve the City's tax base, and create a more sustainable economy with additional employment opportunities.
- **3-B:** Support and encourage live/work spaces for entrepreneurs and start-up businesses in the City.
- **3-C:** Promote the development and rehabilitation of vacant and underutilized spaces in the commercial areas to create new "start-up" or "pop-up" businesses to increase new job opportunities.



- **3-D:** Improve (encourage expansion of) the public transportation system so lower-income persons can have a means of transportation to and from place(s) of work.
- **3-E:** Promote and encourage existing commercial and light-industrial firms to expand their operations, which will increase employment opportunities.

• **Impediment 4: Continue to Review, Monitor, and Update Public Policies**

Public policies such as building codes and zoning ordinances need to be annually reviewed. Furthermore, these policies affect the construction and rehabilitation of housing in the community and determine occupancy requirements, locations, and density of housing.

**Goal:** To bring local policies and regulations into compliance with state and Federal laws, including the Federal Fair Housing Act, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, etc., to affirmatively further fair housing and housing choice in the City of Roswell.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Review and annually update the City's Unified Development Code (zoning ordinance) to include additional definitions and clarification on group homes.
- **4-B:** Continue to enforce local building codes through biennial inspections of all rental units to bring them into compliance under the City's ACE Program.
- **4-C:** Evaluate opportunities to assist both private and non-profit housing developers to construct and/or rehabilitate mixed-income housing.
- **4-D:** Implement the housing needs and opportunities recommendations from the City's Comprehensive Plan, Imagine Roswell – 2035.
- **4-E:** Continue to review and update the City's Comprehensive Plan on a biennial basis to ensure that it identifies the current needs and opportunities in the City of Roswell.



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

Revised Section 3 Certification

9-8-21

**CERTIFICATIONS**

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

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

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

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

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

DocuSigned by: 	9/8/2021
_____ Signature of Authorized Official	_____ Date

\_\_\_\_\_  
Interim City Administrator  
Title



Original SF424, Certifications, and Assurances

5-27-21

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): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 05/28/2021	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>B. APPLICANT INFORMATION:</b>		
* a. Legal Name: City of Roswell		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 58-6000655	* c. Organizational DUNS: 0406960800000	
<b>d. Address:</b>		
* Street1: 38 Hill Street	Street2: <input type="text"/>	
* City: Roswell	County/Parish: <input type="text"/>	
* State: GA: Georgia	Province: <input type="text"/>	
* Country: USA: UNITED STATES	* Zip / Postal Code: 30075-4537	
<b>e. Organizational Unit:</b>		
Department Name: Administration	Division Name: Grants	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: Mr.	* First Name: Charles	Middle Name: <input type="text"/>
* Last Name: Alford	Suffix: <input type="text"/>	
Title: Grants Specialist		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 770-641-3847	Fax Number: <input type="text"/>	
* Email: calford@roswellgov.com		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/> <b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/> <b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/> <b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="United States Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/> <b>CFDA Title:</b> <input type="text" value="Community Development Block Grant;Entitlement Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="B-21-MC-13-0018"/> <b>* Title:</b> <input type="text" value="CDBG Program"/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="City of Roswell - 2021 Community Development Block Grant (CDBG) Program"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant	GA-006
* b. Program/Project	GA-006
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
* a. Start Date:	01/01/2021
* b. End Date:	12/31/2021
<b>18. Estimated Funding (\$):</b>	
* a. Federal	477,213.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	477,213.00
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>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 resuming 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)</b>	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix:	Mr.
* First Name:	Michael
Middle Name:	
* Last Name:	Fischer
Suffix:	
* Title:	Deputy City Administrator
* Telephone Number:	770-534-6265
Fax Number:	
* Email:	mpalmer@crowellgov.com
* Signature of Authorized Representative:	
* Date Signed:	5/26/2021

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 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
	Deputy City Administrator
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Roswell	05/28/2021

SF-424D (Rev. 7-97) Back



**CERTIFICATIONS**

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

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

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

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

<small>Digitally signed by</small>  <small>DN: cn=</small>	5/26/2021
_____ Signature of Authorized Official	_____ Date

\_\_\_\_\_  
Deputy City Administrator  
Title

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

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

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

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

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

<small>Executed by:</small>  <small>Michael Stebbins</small>	5/26/2021
_____ Signature of Authorized Official	_____ Date

Deputy City Administrator  
\_\_\_\_\_  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

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

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

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

DocuSigned by: 	5/26/2021
_____ Signature of Authorized Official	_____ Date
Deputy City Administrator	
_____ Title	

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

 Signature of Authorized Official	5/26/2021 Date
Deputy City Administrator Title	

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

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