

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

The City is a recipient of HUD's Emergency Solutions Grant (ESG), however does not receive HOME Partnership funds (HOME), the City, in its Consolidated Plan, has discussed in detail the needs of the homeless and the populations with special needs (such as the elderly and those with HIV/AIDS). The City does receive an annual award Housing Opportunities for People with AIDS (HOPWA (GY 2015 \$689,956) which is returned to the State of Maryland Department of Health & Mental Hygiene Office of AIDS to administer.) Therefore, the City will continue to support the activities of any of the local providers of emergency shelter, transitional housing, supportive housing, or public services for these clients.

The City has good working relationships with the local banking community which is supportive of many public housing and community development efforts. Most of Frederick's private non-profit organizations not only have an independent source of funds, but also seek assistance from private foundations, all of which have the City's support.

Given its limited resources, Frederick will use innovative approaches and cooperative partnerships with other public agencies and private organizations to meet its affordable housing and community development goals and objectives. In general, the City plans to use its CDBG funds as financial incentives to help resolve its housing and community development needs.

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	HS-1	2015	2019	Affordable Housing	Citywide Low-Mod	Housing Strategy	CDBG: 7,870	1 Household Housing Unit Assisted
2	HS-3	2015	2019	Affordable Housing	Citywide Low-Mod	Housing Strategy	CDBG: \$96,000	Direct Financial Assistance to Homebuyers: 12 Households Assisted
3	HO-1	2015	2019	Homelessness	Citywide Low-Mod	Homeless Strategy	CDBG: 130,500 P/S: 59,000 B/M: \$80,500	Public services for case management and facilities improvement
4	SN-3	2015	2019	Non-Homeless Special Needs	Citywide Low-Mod	Other Special Needs Strategy	CDBG: \$27,300	Low/Moderate Income Housing Benefit:
5	CD-3	2014	2018	Non-Housing Community Development	Citywide Low-Mod	Community Development Strategy	CDBG: \$55,000	Low/Moderate Income Housing Benefit: 7 households assisted.
6	CD-4	2014	2018	Non-Housing Community Development	Citywide Low-Mod	Community Development Strategy	CDBG: \$	
7	AM-1	2014	2018	Administration and Management	Citywide Low-Mod	Administration, Planning, and Management Strategy	CDBG: \$79,000	
8	AM-2	2014	2018		Citywide Low-Mod	Homeowner's Program Delivery	CDBG: \$20,000	

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	HS-2
	Goal Description	<p><u>Housing Strategy -</u> Priority Need: There is a need for additional affordable, decent, safe, and sanitary housing for homebuyers, homeowners, and renters. HS-2 Increase the supply of owner occupied housing units.</p>
2	Goal Name	HS-3
	Goal Description	<p><u>Housing Strategy -</u> Priority Need: There is a need for additional affordable, decent, safe, and sanitary housing for homebuyers, homeowners, and renters. HS-3 Assist lower-income homebuyers to purchase a home through housing counseling, down payment assistance, and closing cost assistance.</p>
3	Goal Name	SN-3
	Goal Description	<p><u>Other Special Needs Strategy -</u> Priority Need: There is a need for housing opportunities, services, and facilities for persons with special needs. SN-3 Support social services, programs, and facilities for the elderly, persons with disabilities, and persons with other special needs.</p>

4	Goal Name	CD-3
	Goal Description	<p><u>Community Development Strategy -</u> Priority Need: There is a need to improve the community facilities, infrastructure, public services, and the quality of life in the City of Frederick. CD-3 Improve and increase public safety, city facilities, public services and social/welfare programs throughout the City.</p>
5	Goal Name	CD-4
	Goal Description	<p><u>Community Development Strategy -</u> Priority Need: There is a need to improve the community facilities, infrastructure, public services, and the quality of life in the City of Frederick. CD-4 Remove and correct slum and blighting conditions throughout the City.</p>
6	Goal Name	AM-1
	Goal Description	<p>Administration, Planning, and Management Strategy - Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs. AM-1 Provide program management and oversight for the successful administration of federal, state, and local funded programs.</p>
7	Goal Name	AM-2
	Goal Description	<p>Administration, Planning, and Management Strategy - Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs. AM-2 Provide planning services for special studies, environmental clearance, fair housing, and compliance with all federal, state, and local laws and regulations.</p>

AP-35 Projects – 91.220(d)

Introduction

The following projects will be funded by the City of Frederick CDBG Program for FY 2015:

Projects

#	Project Name
1	Program Administration & Fair Housing
2	Homeownership Program Delivery
3	Sold on Frederick II
4	Op Rehab
5	FCAA Energy Efficiency Improvements Transitional Shelter
6	Religious Coalition Family Emergency Shelter Rehab
7	Housing Authority Energy Efficiency Rehab
8	FCAA Transitional Shelter Case Management
9	Religious Coalition Case Management

Table 56 – Project

Information

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

The City of Frederick has allocated its FY 2015 CDBG funds to provide assistance with activities to meet the underserved needs of the residents of the City of Frederick. These activities that meet HUD criteria for benefit to low- and moderate-income households are located in those census tracts and/or block groups that are defined as low- and moderate-income areas in the City.

AP-38 Project Summary

Project Summary Information

1	Project Name	Program Administration
	Target Area	Citywide Low-Mod
	Goals Supported	AM-1
	Needs Addressed	Administration, Planning, and Management Strategy
	Funding	CDBG: \$79,475
	Description	Provide program management and oversight of the City's CDBG program.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	This activity will benefit the entire City of Frederick.
	Location Description	Citywide
	Planned Activities	To provide administration and oversight of the City of Frederick's CDBG program.
2	Project Name	Homeownership Program Delivery
	Target Area	Citywide
	Goals Supported	HS-2
	Needs Addressed	Housing Strategy

	Funding	CDBG: \$20,000
	Description	Provide program management and oversight of the City's CDBG program.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	This activity will benefit the entire City of Frederick.
	Location Description	Citywide
	Planned Activities	To provide administration and oversight of the City of Frederick's Housing programs.
3	Project Name	Sold on Frederick II – Down Payment and Closing Cost Assistance Program
	Target Area	Citywide Low-Mod
	Goals Supported	HS-3
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$96,000
	Description	Closing cost/down payment assistance grants.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that twelve (12) families that are below 80% of median income will benefit from this activity.
	Location Description	Citywide
	Planned Activities	Community Development will provide loans to families that are below 80% median income to provide closing cost/down payment assistance for homebuyers.

4	Project Name	Operation Rehab
	Target Area	Citywide Low-Mod
	Goals Supported	HS-1
	Needs Addressed	Housing Strategy
	Funding	CDBG: \$7,895
	Description	The City will assist low to moderate income owner occupied homes with loans to rehabilitate property. Homes. Properties City.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	The activity will have a citywide benefit.
	Location Description	TBD property citywide.
	Planned Activities	Funds will be used to assist one (1) structure in the City of Frederick that pose a public health and safety risk to the residents of the City.
5	Project Name	FCAA Transitional Shelter Energy Efficiency Improvements
	Target Area	100 South Market Street
	Goals Supported	HO-1 , HS-1, & CD-1
	Needs Addressed	Homeless Strategy
	Funding	CDBG: \$38,000
	Description	Provide funding for the replacement of nine (9) electronic key systems and doors for security and overhead lighting in bedrooms and restrooms for maximum energy efficiency.

	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	The transitional shelter has 41 beds and 10 cribs for homeless families and physically disabled adults.
	Location Description	100 S. Market Street
	Planned Activities	Rehabilitate shelter with nine (9) door/electronic key system & LED lighting.
6	Project Name	Religious Coalition Family Emergency Shelter
	Target Area	200 West All Saints Street
	Goals Supported	HO-1
	Needs Addressed	Support the Continuum of Care's efforts to provide emergency shelter, Transitional housing and permanent housing.
	Funding	CDBG: \$42,500
	Description	Provide funding for the rehabilitation of 200 West All Saints Street.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Estimated homeless persons served are 100.
	Location Description	200 West All Saints
	Planned Activities	Rehabilitate kitchen, provide handicap accessibility for property including bathroom, electrical renovations to meet code standard and install emergency lights.

7	Project Name	Housing Authority of The City of Frederick
	Target Area	Scattered sites Bosenberry Lane Apartments and two properties on David Drive.
	Goals Supported	H-1
	Needs Addressed	Conserve and rehabilitate existing housing stock in the community.
	Funding	CDBG: \$55,000
	Description	Provide funding for the energy efficiency rehabilitation of 560, 562, 572 & 577 Boysenberry Lane Apartments, 511 & 518 Riggs Court and 138 Lauren Ct.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	Seven (7) very low income households.
	Location Description	560, 562, 572 & 577 Boysenberry Lane, 511 & 518 Riggs Ct & 138 Lauren Ct.
	Planned Activities	To rehabilitate the exterior of units with higher efficiency materials for reduced energy usage.
8	Project Name	FCAA Transitional Shelter Case Management
	Target Area	100 South Market Street
	Goals Supported	HO-1
	Needs Addressed	Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, and permanent housing.
	Funding	CDBG: \$30,000
	Description	Provide case management at the transitional shelter & apartments.
	Target Date	6/30/2016

9	Estimate the number and type of families that will benefit from the proposed activities	Estimated homeless persons served are 90.
	Location Description	100 S. Market Street
	Planned Activities	Provide case management for persons living at the transitional shelter & apts.
	Project Name	The Religious Coalition
	Targeted Area	27 De Grange Street Frederick, Maryland 21701
	Goal Supported	H0-1
	Needs Addressed	Provide case management at the cold weather shelter
	Funding	CDBG \$29,000
	Description	Provide case management services for homeless persons.
	Target Date	6/30/2016
	Estimated the Number	100 clients
	Location Description	27 De Grange Street Frederick, MD 21701
	Planned Activities	Provide case management services for homeless persons.

AP-50 Geographic Distribution – 91.220(f)

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

The City of Frederick will provide CDBG funds to activities principally benefitting low/mod income persons throughout the City. The majority of CDBG project funding is not directed to any specific geographic targeted area, but based on high priority needs on a citywide basis. Activities that do not necessary provide an area benefit per HUD regulations often do succeed. All of the projects financed with CDBG funds in FY 2015 will benefit low- and moderate-income persons throughout the City.

The City of Frederick Consolidated Plan defines an Area of Minority Concentration as follows; “Census tracts where at least 30% of the population who reside within the census tract are identified as minority households, as defined by the 2010 U.S. Census.” The areas identified within the City of Frederick which qualify are stated as census tract and minority percentage, those with an asterisk (*) are also low income: 7503.00/48.15%; 7503.03/63.04%*; 7505.04/53.62%; 7505.05/67.51; 7505.06/45.05%; 7507.01/42.27; 7507.02/41.23%; 7508.03/30.86%; 7510.01/38.78%; 7510.02/30.72%; 7512.02/34.33%; 7522.02/45.06%; 7522.04/34.60%; 7523.01/38.20%; 7651.00/32.86% and 7722.00/33.98%*.

30% HAFMI		50% HAFMI		80% HAFMI	
% of households with income = 30% HAMFI	Tract	% of households with income = 50% HAMFI	Tract	% of households with income = 80% HAMFI	Tract
14.22	24021750504	13.04	24021751003	13.04	24021751003
18.73	24021765100	32.1	24021750505	49.19	24021750505
72.73	24021775600	31.75	24021765100	24.18	24021750802
0	24021750506	31.42	24021750801	40.79	24021750504
15.2	24021750801	36.96	24021751201	24.68	24021751201
13.94	24021751202	72.73	24021775600	25.29	24021751202
0	24021751301	23	24021751202	0	24021750506
11.43	24021750600	0	24021750506	57.69	24021750100

**City of Frederick
Geographic Distribution**

**Annual Action Plan
2015 Consolidated Plan**

16.19	24021750702	70	24021751203	70	24021751203
9.62	24021750803	48.03	24021772200	0	24021751301
13.58	24021750503	0	24021751301	31.71	24021751202
28.46	24021750100	26.19	24021750200	58.41	24021750702
3.9	24021751201	18.18	24021751201	21.52	24021750506
4.12	24021751202	22.86	24021750600	39.52	24021750506
3.8	24021750506	3.8	24021750506	46.03	24021765100
35.2	24021750300	50.28	24021750300	100	24021775600
10.14	24021751003	8.87	24021750701	30.48	24021750600
8.7	24021751201	19.87	24021750803	70.95	24021750300
40	24021751203	46.03	24021750702	27.35	24021750803
22.37	24021772200	16.85	24021750802	20.49	24021750701
12.93	24021750505	12.5	24021751301	33.33	24021751301
8.42	24021750802	31.13	24021750503	57.89	24021772200
3.23	24021750506	11.76	24021751202	44.59	24021750801
1.83	24021750701	20.97	24021750506	56.52	24021751201
12.5	24021751301	52.31	24021750100	41.07	24021750200
10.71	24021750200	23.31	24021750504	43.58	24021750503

Geographic Distribution

Target Area	Percentage of Funds
Citywide Low-Mod	100

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically.

The rationale for funding activities was based on the eligibility of the activity. The activity must meet a national objective and demonstrate evidence of need in the community. Additional consideration was given based on the community's or the agency/organization's past history of expenditure of the CDBG funds, the ability to leverage other funds for this activity, and whether the FY 2015 request was related to projects that if not funded, would result in a special assessment against low-income homeowners. Finally, a high priority was given to activities based on the community's or agency/organization's ability to complete the project in a timely manner. The City will provide CDBG funds to activities principally benefitting low/mod income persons in the City but additional consideration is given to projects that benefit the target areas of the City.

The City of Frederick has established the following criteria when establishing priorities for CDBG projects:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of very-low and low- and moderate-income residents
- Focusing on low- and moderate-income areas or communities
- Coordinating and leveraging of resources
- Response to expressed needs
- Projects that would otherwise cause a special assessment to be levied against low- and moderate-income households
- Ability to complete the project in a timely manner

Affordable housing was identified as one of the largest underserved needs in the City in the Five Year Consolidated Plan. The City of Frederick is not a HUD entitlement jurisdiction under the HOME program. Therefore, resources for housing activities are limited. The primary obstacle to meeting the underserved needs is the limited resources available to address the identified priorities in the City.

Discussion

See AP-5 Table 56 for projects.

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Frederick will utilize its CDBG funds to rehabilitate existing affordable housing units and to provide down payment/closing cost assistance to facilitate housing affordability.

The one year goal for affordable housing in the City of Frederick FY 2015 are as follows:

Project:

- 2015-03: Sold on Frederick II - Down Payment Closing Cost Assistance Loans.
- Available city wide for income eligible low to moderate income first time homebuyers for primary residence.
- 2015-04: Op Rehab – residential rehabilitation for owner occupied units in need of health, safety or code violations for income eligible low to moderate persons.
- 2015-07: Housing Authority of The City of Frederick - Energy Efficiency Rehabilitation of seven (7) scattered Sites serving very low income persons.

One Year Goal for the Number of Households to be Supported	
Homeless	0
Non-Homeless	12
Special-Needs	0
Total	12

Table 58 - One Year Goal for Affordable Housing by Support Requirement

One Year Goal for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	8
Acquisition of Existing Units	0
Total	8

Table 59 - One Year Goal for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

It is the mission of the Housing Authority of The City of Frederick (HACF) to address the needs of the extremely low income, very low income, and lower income residents of the City of Frederick. The HACF provides affordable housing in the most efficient and effective manner to qualified individuals in accordance with the rules and regulations prescribed by the U.S. Department of Housing and Urban Development, the State of Maryland, Frederick County, the City of Frederick, and any other entity providing funding for affordable housing programs. This is achieved by the HACF assisting individuals and families through its public housing communities and Section 8 Housing Choice Vouchers.

Actions planned during the next year to address the needs to public housing.

The Housing Authority of The City of Frederick plans to allocate the following FY CDBG 2015 of \$55,000 funds for its public housing scattered sites for energy efficiency rehabilitation.

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

The Housing Authority encourages residents of its public housing units to organize community groups to become more involved in housing management. Neighborhood crime watch groups have been formed and assist in ensuring the safety of residents is maintained. Additionally, the HACF schedules regular meetings at public housing sites to discuss needs and concerns. Voucher holders are also encouraged to participate in regular HACF meetings.

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

The Housing Authority is not designated as “troubled” by HUD and is performing satisfactorily according to HUD guidelines and standards.

Discussion

The City of Frederick has identified that there is a need for housing to address the households affected by housing problems, severe housing problems, and housing cost burdens. The Housing Authority is an important part of the City of Frederick’s housing strategy. The HOCF is housing provider of housing for extremely low - income, very low income, and lower income residents of the City of Frederick.

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

Introduction

For 2013-2014 Continuum of Care application, Frederick County & City received \$7,952 from the Homeless Assistance Award for Planning and was awarded a total of \$606,700 for Frederick Transitional Apartments, Transitional Shelter, Housing First Renewal 2013, Housing First Renewal 2013 II, Ice, Patrick Street Transitional Housing, MHA S+C Frederick County 16 units NOFA 2013, and MHS S+C Frederick County 3 units NOFA 2013.

Describe the jurisdictions one-year goals and actions for reducing homelessness

The City of Frederick's one year action is to increase the award of public service funds for case management at the Religious Coalition and Frederick Community Action Agency in the effort of reducing homelessness. The Frederick County Coalition for the Homeless has formed a strategic Planning Committee with defined goals and objectives.

1. Define, quantify and increase the current status of affordable permanent housing options by measurable percent.
2. Identify and promote best practices in homelessness prevention programs so that the number of working families spending more than 30 percent of their income on housing is decreased by a measurable percent.
3. Sponsor an annual forum for all facets of the community, including business, nonprofit, and government, to address issues around homelessness and to encourage collaboration and positive change.
 - Increasing awareness/understanding by leaders who control funding
 - Producing an annual report on homelessness, including funding, outcomes, stewardship, units of service provided, trends, and accomplishments
 - Developing ways to inform the public of success stories and positive outcomes as the result of service provider efforts
4. Increase shelter and service capacity within the continuum of care.
 - Providing a year-round shelter with 24-hour availability for both individuals and families
 - Obtaining Single Room Occupancy (SRO) zoning in the City of Frederick
 - Increasing capacity to serve homeless families, and ensuring that homeless individuals and families receive priority for subsidies, prevention services and rapid rehousing
 - Investigating and implementing, if feasible, a centralized screening location for intake using a holistic approach
 - Implementing best practices that reduce the duration of homelessness
 - Prioritizing individuals and families who are homeless via population group for entry
 - Increasing all levels of shelter beds and their respective utilization rates
 - Establishing a "no-wrong door" approach among service providers for assessment and resolution
 - Coordinating case management for accessing programs
 - Developing and utilizing a system of awareness of availability of beds

Addressing the emergency shelter and transitional housing needs of homeless persons

FCAA is hoping to expand its permanent supportive housing programs that will free up beds at the emergency shelter and transitional shelter locations.

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.

FCCH CoC provides supportive services to homeless persons to enable them to make the transition from homelessness to offer forms of permanent housing. This process requires assistance every step of the way, as well as continued monitoring and assistance after homeless persons have found permanent housing. The FCCH CoC has found that the first year after homelessness is the most important time for supportive services to still be made available to achieve the highest possible levels of success.

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 an systems of care or receiving assistance form public or private agencies that address housing, health, social services, employment, education or youth needs.

The Maryland Department of Health & Mental Hygiene (DHMH) provides referral services and case management to persons being discharged from such institutions to ensure that those persons received supportive services that they will need. FCAA also provides referral services and information on affordable housing options in the City for individuals and families in an effort to avoid becoming homelessness.

AP-75 Barriers to Affordable Housing – 91.220(j)

Introduction

A variety of barriers exist which make increasing the affordable housing stock in The City of Frederick difficult:

1. Income and wages are not keeping pace with rising housing costs and the overall cost of living.
2. Federal resources for programs, such as the federal Section 8 Program, do not match the need experienced.
3. Homeownership is out of reach for the majority of residents.
4. Low housing vacancy rates are contributing to higher rents.
5. The cost of land is high and there is a lack of vacant land for future growth.
6. Development barriers in some communities, including permit processing times, height restrictions, outdated community plans, environmental review, and community opposition (“NIMBYism”).
7. Backlog of infrastructure and public facilities investment needs.
8. Impediments to Fair 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.

The City of Frederick has made attempts to address barriers to affordable housing in a variety of ways. An ordinance to enact inclusionary zoning was adopted in 2008 with the creation of a new chapter titled “Affordable Housing” in the Frederick City Code. This ordinance requires the creation of Moderately Priced Dwelling Units (MPDU) at the ratio of 12.5% per every 25 new units built.

As an incentive to create more than the required number of MPDUs a density bonus is available for developers if more than the minimum number of MPDU are constructed.

The City also features several zoning districts that encourage a mix of housing types which can aid in the provision of affordable units. Furthermore, accessory apartments and accessory detached dwelling units may be constructed in some residential zoning districts provided certain conditions are satisfied. Another action The City of Frederick too was to amend its Land Management Code to eliminate parking requirements for residential units in the downtown core which removes a significant obstacle to constructing new units, many of which could be rental apartments.

CDBG Fund the Sold on Frederick II program. This funding source can be used alone or in combination with each other funding sources. The fund has its own requirements for allowable uses, repayment terms and project affordability restrictions. The First-Time Homebuyer loans, closing cost assistance grants, and permanent financing no-interest loans all utilize CDBG funds.

The following impediments to fair housing choice and recommendations are presented to assist the City of Frederick to affirmatively further fair housing in the community. Below is a list of impediments that were developed as part of City's Analysis of Impediments to Fair Housing Choice.

- Impediment 1: Fair Housing Education and Outreach - There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population.

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

- Impediment 2: Continuing Need for Affordable Housing - The City of Frederick has a limited supply of affordable housing. However, the monthly cost of rent for apartments and the monthly costs associated with owning a house has steadily increased to the point that over 48.8% of all renter households and 36.1% of all owner households are considered cost overburdened.

Goal: Additional affordable rental and for-sale housing should be developed impacted areas throughout the City of Frederick and the surrounding region, especially for households whose income is less than 80% of the median income, through new construction and in-fill housing, the rehabilitation of vacant buildings, and the development of mixed-income buildings, to reduce the number of households who are cost overburdened.

- Impediment 3: Continuing Need for Accessible Housing Units That Are For-Sale or Rent - There is a lack of accessible housing units in the City of Frederick.

Goal: Increase the number of accessible housing units through acquisition and rehabilitation of existing housing units for both the physically and the developmentally disabled.

- Impediment 4: There is a Need for a Coordinated Approach to Affirmatively Furthering Fair Housing

The City and County should coordinate efforts to affirmatively further fair housing.

Goal: The City of Frederick, as lead jurisdiction, should partner with the County to initiate a process to coordinate fair housing practices and policies throughout the City and County.

- Impediment 6: Public Policy - The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

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

The City of Frederick has prepared strategies to affirmatively further fair housing in the City, which is included in the City's FY 2014 Analysis of Impediments to Fair Housing Choice. In particular, Impediment No. 6 addresses the need to eliminate barriers to affordable housing as a result of public policies:

Impediment 6: Public Policy - The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

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

6-A: Revise the definition of "family."

6-B: Revise the definition of "group domiciliary care facility."

6-C: Revise the definition of "group home."

6-D: Revise the definition of "housing for the elderly and handicapped."

6-E: Include the definition of "the Fair Housing Act."

Discussion

The City of Frederick is committed to removing or reducing barriers to the development of affordable housing whenever possible throughout the City. A variety of actions include, among others, to reduce the cost of housing to make it affordable. To achieve this goal, the City of Frederick plans to:

- Provide developers with incentives for construction of affordable housing
- Assist in acquiring sites for affordable housing
- Promote Federal and State financial assistance for affordable housing

The City's Analysis of Impediments was recently updated and in compliance with the Federal regulations governing fair housing and identifies strategies to promote affordable housing

The City of Frederick has allocated PY 2015 CDBG funds for the following activities to affirmatively further fair housing:

- Project 2015-01: Planning, Administration & Fair Housing – The City of Frederick annually produces the Fair Housing Conference to promote education and awareness to real estate professionals in the month of April. Additionally, they actively participate in the Maryland Realtors Fair Housing Poster Contest which involves school age children drawing pictures of the selected theme of fair housing. The winner's artwork is chosen is part of the following year calendar.
- Project 2015--03: Sold on Frederick – Down payment and closing cost assistance for low to moderate income persons for purchase of single family owner occupied home.

AP-85 Other Actions – 91.220(k)

Introduction

The City of Frederick has developed the following actions planned to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based hazards, reduce the number of poverty-level families, develop institutional structures, and enhance coordination between public, private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting the underserved needs in the City of Frederick is the limited financial resources available to address the priorities identified in the Five Year Consolidated Plan and the lack of affordable housing. The City of Frederick is not a HUD entitlement jurisdiction under the HOME program. Therefore, resources for housing activities are limited. Under the PY 2015 CDBG Program, the City will take the following actions: leverage its financial resources and apply for additional public and private funds, provide down payment and closing cost assistance loans, continue its support and cooperation with the Continuum of Care, promote economic development, provide public safety improvements and to remove slum and blighting conditions in the City.

Actions planned to foster and maintain affordable housing

The City of Frederick will fund the following affordable housing projects with 2015 CDBG funds:

- Project 2015--03: Sold on Frederick II - Down Payment Closing Cost Assistance Loans - will be available city wide. (CDBG - \$96,000)
- Project 2015-04: Operation Rehab –loan assistance to primary residential owner occupied single family homes in need of rehabilitation to correct code violation, health or safety issue. (CDBG - \$7,875)

Actions planned to reduce lead-based paint hazards

Children are at the greatest risk from birth to age six while their neurological systems are developing. Sustained exposure to lead can cause long-lasting neurological damage or death. Effects of sustained exposure include learning disabilities, shortened attention span, irritability, and lowered IQ.

For children is lead paint dust from deteriorated lead paint or from home renovation. Most children exposure occurs through children's normal hand-to-mouth activity after contact with a source of leaded dust. The most effective prevention of childhood lead poisoning is to reduce or eliminate exposure. According to the Childhood Blood Lead Surveillance in Maryland Annual 2013 Report made available July 2014, the findings for Frederick County are that of 21,347 children ages 0-72 months 2,973 or 13.9% were tested. The best method to identify children with lead exposure is a blood test as there are no symptoms. Early detection is critical in childhood lead poisoning.

From the previous year five properties affected, two were owner occupied.

The City of Frederick will continue to comply with Title 24 Part 35: Lead-Based Paint Poisoning Prevention in Certain Residential Structures (Current Rule).

Rehabilitation Programs

The City of Frederick will continue to ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk management, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities, when applicable.

Homeownership Programs

The City of Frederick will continue to ensure that:

- Applicants for homeownership assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building or soil.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35.
- The home purchaser receives the required lead-based paint pamphlet and notices.

Actions planned to reduce the number of poverty-level families

Approximately 11.2% of the City of Frederick’s residents live in poverty, which is greater than the State of Maryland where 9.6% of residents live in poverty. Female-headed households with children are particularly affected by poverty at 22.6%, and 16.9% of all youth under the age of 18 were living in poverty. This information is taken from the U.S. Census “2009-2013 ACS Five-Year Estimates.” The City’s goal is assist other agencies and organizations to reduce the extent of poverty.

Actions planned to develop institutional structure

The City of Frederick Department of Community Development will coordinate activities amount the public and private agencies and organizations in the City. This coordination will ensure that the goals and objectives outlined in the FY 2015-2019 Five Year Consolidated Plan will be effectively addressed by more than one agency. The staff of the Department of Community Development will facilitate and coordinate the linkage between these public and private partnerships and develop new partnership opportunities in the City.

This coordination and collaboration between agencies is important to ensure that the needs of the residents of Frederick are being addressed. The main agencies that are involved in the implementation of the Plan, as well as additional financial resources that are available are the following:

Public Agencies

- City of Frederick Department of Community Development – is responsible for administration of the CDBG program.
- Frederick Housing Authority – is responsible for administering the Section 8 Housing Choice Vouchers and the public housing units.

Non-Profit Agencies

There are several non-profit agencies that serve low income households in the City. The City continued to collaborate with these agencies. Some of these agencies are the following:

- Religious Coalition
- Community Action Agency

The private sector is a key collaborator in the services and programs associated with the Five Year Consolidated Plan. The private sector brings additional financial resources and expertise that can be used to supplement existing services in the City. Examples of these private sectors are: local lenders, realtors and title companies.

Affordable housing developers, business owners, community and economic development organizations, healthcare organizations, and others. The City will continue to collaborate with local financial institutions, private housing developers, local realtors, etc.

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

The City of Frederick is committed to continuing its participation and coordination with social service agencies, housing agencies, community and economic development agencies, County, Federal, and State agencies, as well as with the private and non-profit sectors, to serve the needs of target income individuals and families in the City of Frederick. The City solicits funding requests for CDBG funds annually. The City Department of Community Development staff provides help and assistance as needed to assist these public agencies that receive CDBG funding.

During this program year, the City funded Project 2015-201: Program Administration in the amount of \$75,000 to accomplish this.

Discussion

Not applicable.

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

Introduction

The City of Frederick will receive an annual allocation of CDBG funds in the amount of \$372,370 plus anticipated program income of \$25,000 for FY 2015. Since the City receives a CDBG allocation, the questions below have been completed as applicable.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

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

1.	The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$25,000
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
Total Program Income:		\$25,000

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. 80%

Discussion

The overall benefit was calculated as follows:

Total CDBG Allocation \$372,370 + \$25,000=397,370

(Administration \$79,474)

Equals \$317,896 =80%

Non low-mod is \$79,474 for program administration therefore and \$317,896 is low-mod benefit = 80%.

Appendix - Alternate/Local Data Sources

	<p>Data Source Name</p> <p>2010 Census</p> <hr/> <p>List the name of the organization or individual who originated the data set.</p> <p>U.S. Census Bureau.</p> <hr/> <p>Provide a brief summary of the data set.</p> <p>The most up to date, complete set of data available is the 2010 U.S. Census.</p> <hr/> <p>What was the purpose for developing this data set?</p> <p>The 2010 Census was the most recent decennial Census.</p> <hr/> <p>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</p> <p>The most up to date, complete set of data available is the 2010 U.S. Census.</p> <hr/> <p>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</p> <p>The time period from the year 2000 until the year 2010.</p> <hr/> <p>What is the status of the data set (complete, in progress, or planned)?</p> <p>The 2010 U.S. Census is complete.</p>
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