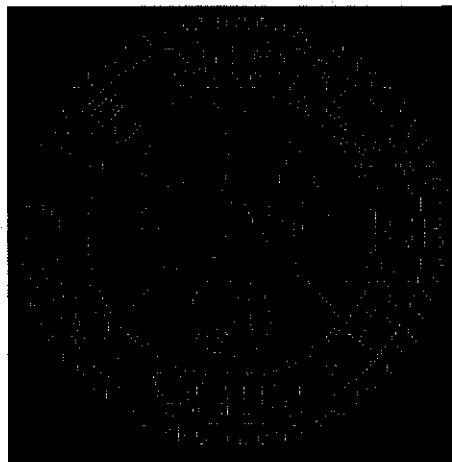


**FISCAL YEAR 2012
HUD Annual Action Plan
B-12-MC-39-0013**



**City of Middletown, Ohio
Community Development Block Grant Program
Judy Gilleland, City Manager
Doug Adkins, Community Revitalization Director
Kyle Fuchs, HUD Program Administrator**

March 2012



Third Program Year Action Plan

(FY 2012) – B-12-MC-39-0013
Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 3 Action Plan Executive Summary:

The City of Middletown continued strong code enforcement efforts in PY2011. In addition to finalizing rehab of vacant foreclosed homes and continued demolition of blighted abandoned housing through NSP, the City utilized CDBG funding for major exterior residential rehabilitation on 2 properties with the help of local church volunteers through our VIP project. In PY2010, the VIP project using the same church volunteers assisted 50 households with minor repairs. This year, funds were best utilized for more extensive work on 2 properties in one of our target neighborhoods. The City finalized the PY2010 street paving project and continued subrecipient funding through People Working Cooperatively for emergency repairs for low income households. The balance of the funding was provided to support S.E.L.F.'s efforts for Group Workcamps (providing minor residential repairs to low income homeowners) and other local non-profits to provide legal and fair housing services needed in our community. In our current 2011 program year, the City accomplished the following to date:

- *Served 14 low income households with emergency repairs through the non-profit, People Working Cooperatively.*
- *Served 16 households with fair housing complaints and investigations through the non-profit, Housing Opportunities Made Equal (H.O.M.E.).*
- *Served 16 households with legal issues involving tenant/landlord disputes, foreclosures, and fair housing complaints.*
- *Completed 4,389 code enforcement inspections of which 1,328 were resolved voluntarily and 1,197 were resolved contractually.*
- *Completed extensive exterior residential rehabilitation on 2 properties through the V.I.P. project.*
- *Partnered with S.E.L.F. for the Group Workcamps program to complete minor residential repairs to 88 low-income households.*

In addition, the City is finalizing rehabilitation on the last NSP acquired property of our original obligation and is moving forward with the demolition of blighted, vacant housing. We are continuing to acquire properties to rehabilitate through NSP1 and NSP3 while keeping a heavy focus on demolition of blighted vacant abandoned housing throughout the City.

In program year 2012, the City of Middletown will creatively utilize all available funding including CDBG, NSP, and HOME in a results oriented approach. Like the current FY 2011-2012 fiscal year, a significant portion of CDBG funding will be used for proactive code enforcement and demolition of blighted housing for the 2012 program year. Code enforcement staff will be able to conduct a minimum of 2000 inspections. Over the past 2 program years, several improvements were made to streamline the operation of Code Enforcement staff such as the implementation of advanced software which provides better case tracking and a greatly improved database platform for staff. The City continues to utilize a process server to serve court code violations on property owners. The City is budgeting \$50,000 of PY2012 CDBG funds for emergency home repairs. It will assist an estimated 30-50 low-income homeowners and be administered through a local non-profit called People Working Cooperatively. The City will continue to operate our V.I.P project allocating \$40,000 in CDBG funds to the activity. It is estimated that a minimum of 2 low-moderate income households will receive major assistance under V.I.P. for exterior housing rehabilitation. The City is also budgeting \$50,000 for new playground equipment and \$100,000 for street paving. In addition, the City is committed to affirmatively furthering fair housing and is budgeting CDBG funds for fair housing services through Housing Opportunities Made Equal (fair housing testing and assistance - \$5,000 budgeted - estimated 15 people served) and Legal Aid of Greater Cincinnati (legal representation for low-moderate income households with fair housing issues, foreclosure prevention, and tenant/landlord disputes - \$15,000 budgeted - estimated 15 people served).

The City is completing a substantial amendment to the 2010-2014 Consolidated Plan regarding the use of the revolving loan fund. In the past, that fund was used to provide residential rehabilitation assistance to low-moderate income homeowners on a repayable loan basis. Due to the current housing crisis, the fund is better suited to alleviate vacant housing code violations. The foreclosure process can be lengthy and during that process, many homeowners have "walked away" from the property and the banks claim it isn't theirs yet to maintain. These vacant properties with housing violations that are "sitting in limbo", will have the violations abated with the revolving loan fund and then assessed against the property taxes at 2.5 times the cost of abatement. These repairs will help stabilize surrounding property values and help alleviate further blighted housing. When the property is eventually sold at sheriff's sale, the funds are reimbursed to the revolving loan fund ahead of any mortgage holder.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state and local resources to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 3 Action Plan General Questions response:

As noted in the Strategic Plan, based on the latest U.S. Census data and Comprehensive Housing Affordability Strategy (CHAS) information, the City of Middletown qualifies as a low-to moderate-income area on a citywide basis. The areas of racial concentration are primarily on the west and south sides of town. The City is made up of 38 individual neighborhoods (see attached map). Identified in the Comprehensive Plan are the City's target neighborhoods. Each year of this 5 year consolidated plan will focus the majority of all activities to 1 to 2 of the target neighborhoods most in need of revitalization. Selection is based on the data listed in the neighborhood strategy section of the Consolidated Plan and with consultation and input from the Consolidated Planning Committee. Work will continue in these target neighborhood(s) until all available funds have been depleted or until statistics show the area has become self-sustaining. For the FY 2012 action plan, the City will continue to focus on the Douglass and Harlan Park neighborhoods and start focus on the Highlands and El Dorado neighborhoods. The decision as to which targeted neighborhood(s) will be the revitalized next is based on the overall rank score as specified on page 53 of the Consolidated Plan as well as what areas certain activities can feasibly be funded and/or leveraged with additional funding outside CDBG grants.

Also, as noted in the Strategic Plan, the major obstacle to meeting underserved needs is lack of resources. To help overcome this, the goal is to leverage non-federal funds to CDBG funds 2 for 1. Due to the limited funds available, leveraging resources is critical to achieving our goal. During Program Year 2012, the City of Middletown intends to leverage private investment in neighborhoods by supporting minor to major housing renovation, homeownership incentives, property enhancement incentives, donated labor, and enforce clean up of investor and other privately owned properties.

Federal funds to be utilized in PY 2012 include CDBG, HOME, NSP1, NSP3, and the Housing Choice Voucher Program.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 3 Action Plan Managing the Process response:

The City of Middletown, Community Revitalization Department is the lead entity responsible for administering the programs covered by the Consolidated Plan. Partners in this process include organizations such as People Working Cooperatively, the Middletown Area Community Coalition, Legal Aid Society of Southwest Ohio, LLC, Housing Opportunities Made Equal (H.O.M.E.), and Neighborhood Housing Services of Hamilton, Inc.

The process of drafting the Year 3 Annual Action Plan was developed by working with the Consolidated Planning Committee and through consultations with the general public, as described in the Consolidated Plan.

It is the City of Middletown's intent that during the next year, coordination between public and private housing and social service agencies will be enhanced by inviting private businesses to invest funds in the same neighborhoods that are to be revitalized with CDBG, HOME, and NSP funds. We plan on community participation to achieve this goal by partnering with citizens, landscapers, contractors, churches, and non-profits to invest private dollars and time to help improve these target neighborhoods.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Program Year 3 Action Plan Citizen Participation response:

The Middletown Consolidated Planning Committee, a diverse group of community representatives, met on December 14th, 2011 and January 4th, 2012 to discuss the PY 2012 Annual Action Plan. The discussion included the development of the annual action plan through recommended program activities, annual budget, and the selection of target neighborhoods. Members of the Consolidated Planning Committee included representatives from: the United Way, the Butler County Homeless Coalition, Neighborhood Housing Services of Hamilton, Inc., the City's Planning Director, the Middletown Police Department, 3 members of City Council, 2 members of the Community Revitalization staff, and a citizen and volunteer from "Keep Middletown Beautiful". The City of Middletown's Citizen Participation Plan is attached.

It is a good practice to consult with local housing agencies when preparing the Annual Action Plan. However, the Middletown Public Housing Agency (MPHA) is operated by the City of Middletown. Both the Community Development department (which prepares the CDBG annual Action Plan) and MPHA report to the City's Director of Community Revitalization. Middletown City Council also operates as the Board of MPHA and approves both MPHA's Agency Plan and the City's CDBG Annual Action Plan. MPHA is aware of the City's Consolidated Plan goals and strategies and each year's Action Plan priorities. While we have a strong working relationship with Butler Metropolitan Housing Authority, BMHA operates its Section 8 program outside of the City of Middletown and only operates a few public housing projects within the City's border. BMHA is aware of our program and goal but was not consulted directly when creating the 2012 Action Plan.

The City takes every feasible effort to broaden public participation and reach out to minorities, non-English speaking persons, and individuals with disabilities. Please see the citizen participation plan which includes a televised public hearing and copies of the proposed plan placed at the public library, the senior citizen center, at the Community Revitalization Department in the City building, and on the City's web page. The plan was

available for input in person, at local community outlets and online to reach the broadest possible audience. Copies were available to take for later reading and comment. (Comments tba)

In addition to the Consolidated Planning Committee, the Middletown City Council held a public hearing to obtain citizen views and respond to citizen proposals:

Public Hearing: January 17, 2012	Published in Middletown Journal Paper: January 4th and 11th, 2012 via legal ad and on January 6th 2012 via regular ad	City Council Chambers, televised
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The 30-day Public Comment Period ran from **January 17th, 2012 through February 16th, 2012**. The City of Middletown will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final consolidated plan.

Comments: tba

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 3 Action Plan Institutional Structure response:

The City of Middletown plans to undertake the following actions during the next year to continue to develop an improved institutional structure:

- 1) Continue and enhance private sector involvement.
- 2) Continue as an active member in the Butler County Housing and Homeless Coalition.
- 3) Continue regional meetings with adjacent jurisdictions to discuss community needs.
- 4) Continue cooperation with local funding agencies, such as the United Way and the Middletown Community Foundation, to assist wherever possible.
- 5) Continue as an active member of the Butler County Homeowner Preservation Group, seeking resources to keep homeowners in their home and reduce foreclosures.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 3 Action Plan Monitoring response:

The City of Middletown, Community Revitalization Department, will take the key role for implementation and monitoring its housing and community development projects to ensure long-term compliance with program requirements and comprehensive planning requirements. Community Revitalization staff will conduct monitoring visits with all sub-

recipients as needed as well as desk reviews, and financial and performance monitoring on a quarterly basis.

Monitoring of all City operated projects will be done through desk reviews, periodic reviews of the Action Plan and Consolidated Plan, reviews of funding applications, and through compliance with all applicable federal regulations.

Each housing program funded by the City of Middletown will be reviewed for compliance with federal regulations such as Section 504/Handicapped Accessibility, Lead Based Paint requirements, Housing Quality Standards (IPMC), Davis Bacon, Section 3, and other federal requirements.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families.

Program Year 3 Action Plan Lead-based Paint response:

Actions taken to evaluate and reduce lead based paint are incorporated into our housing rehabilitation programs. It is our intent that at least 10 households will receive the following services during this program year:

Inspect homes for housing code violations After receiving a rehabilitation or down payment application, homes will be inspected for housing code violations with the age of the housing noted for possible lead hazards.

Lead risk assessor identifies lead-based paint hazards Prior to any rehabilitation work, a licensed Lead Risk Assessor will perform a risk assessment to determine any lead hazards and areas of concern which could be damaged during construction. A copy of this assessment is documented in the file.

Estimate the cost of work to be done The project specs and cost estimate include the standard construction work on the project and any lead renovation/abatement work to be performed. A licensed lead abatement contractor will be utilized, when required, to assist the contractors in selecting the best abatement methods.

Clearance A clearance test is performed on any project that will disturb lead based paint surfaces. Contractors performing this work must be a certified lead safe renovator. Final project payout is not released until the site passes the clearance test(s). This allows the city to control costs on a project as well as provide the clearance in a timely manner.

Middletown Public Housing Agency will also conduct Lead Based Paint inspections and clearance when required as part of the HQS inspection process through the City's Section 8 Housing Choice Voucher Program.

HOUSING

Specific Housing Objectives

Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

Priorities that the City of Middletown hopes to achieve during the next year include:

- *Acquisition and rehabilitation of additional foreclosed properties through NSP to meet the 25% program income requirement.*
- *Emergency repair services to at least 10 owner occupied homes*
- *Provide minor exterior rehabilitation services to 2 owner occupied low and moderate income households through our V.I.P. Program.*
- *Use HOME funds to provide down payment assistance to 40 low and moderate income first-time homebuyers*
- *Utilize housing code enforcement efforts to conduct 2,000 inspections resulting in 500 properties returned to property maintenance code compliance.*
- *Demolition of an estimated 35 blighted properties.*

The City has earmarked a share of federal (CDBG, HOME and NSP) funds to assist these projects and private investment will be sought where possible for construction projects.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 3 Action Plan Public Housing Strategy response:

The City of Middletown along with Consortium partner Butler County will continue to offer technical assistance to Butler Metropolitan Housing Authority (BMHA).

The City of Middletown formed the Middletown Public Housing Agency in the 1970's to administer its Housing Choice Voucher Program. The Board is made up of the six City Council members and the Mayor and meets monthly to discuss public housing issues separate from the Community Development Division of the Community Revitalization Department. The Agency does not own any housing projects but utilizes housing choice vouchers. MPHA operates the following programs to address the needs of public housing:

1. *Mainstream Housing Opportunities for Persons with Disabilities Program* – HUD provides financial housing assistance (Housing Assistance Payment) for adults with disabilities.
2. *Family Unification Program* – work with Butler County Children's Service to provide housing assistance for families whom they establish as needing housing in order to have their children returned to their household
3. *Housing Assistance for Non-Elderly Persons with Disabilities* – HUD provides financial housing assistance subsidy (HAP) for non-elderly persons with disabilities.
4. *Family Self Sufficiency Program* – Middletown Public Housing Agency's FSS Coordinators counsel with families to connect them with support services and resources in the community to help the families move toward economic self-sufficiency. These support services include referral to technical training, encouraging employment, achieving GED, attending college, etc. and supporting them with their efforts through counseling.
5. *Escrow Account* – When a family participating in the Family Self Sufficiency Program earns additional income, the family will pay a larger portion of the rent. The difference between what the person was paying before the increase in income and what he pays after the increase is matched with HUD funds and placed in an escrow account in a local bank. Once the family reaches the goal of self-sufficiency and graduates from the program, the family receives all of the escrow.
6. *Homeownership Program* – Enable Housing Choice Voucher Program Participants to become homeowners. Although the program is quite entailed, the end result is that the Housing Assistance Payment (HAP) is used to pay the family's mortgage. The program must include:
 - Budget and money maintenance, credit counseling
 - Knowing the players and their roles in the home buying process
 - How to negotiate purchase price
 - Preparation for loan qualification and application
 - How to obtain homeownership financing
 - How to find a home
 - Advantages of purchasing a home in a more diverse neighborhood
 - Maintaining a home, avoiding delinquencies
 - Defaults and foreclosures

A minimum of 8 hours of homebuyer education must be completed before an applicant may use their voucher to purchase a home. Some families may require more extensive home education or financial fitness classes before they are determined ready to purchase a home.

7. *Single Room Occupancy* – These 11 units are Project Based, meaning the subsidy is attached to the unit, rather than the individual. The units are located in Hope House Rescue Mission.

The MPHA Board will be reviewing subsidized housing levels of all types in the City of Middletown to determine if current needs are best being met by the current levels maintained, or whether current needs or unmet needs might be better served by adjusting the overall level of public housing in the City.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 3 Action Plan Barriers to Affordable Housing response:

As documented in the Consolidated Plan, the City of Middletown has a housing stock that is valued significantly lower than surrounding areas. The biggest barrier surrounding many of these properties is their overall condition. During Program Year 2012, the City of Middletown will strive to improve its affordable housing stock by:

- 1) *Maintaining code enforcement efforts so that all occupied property is safe.*
- 2) *Enhancing the oversight of Housing Choice Voucher Program to serve low income households.*
- 3) *Strictly enforce HQS inspection requirements and housing quality standards under Section 8*
- 4) *Demolishing blighted properties.*
- 5) *Providing down payment/closing cost assistance.*
- 6) *Subsidizing the sale price of NSP properties to an affordable level.*

HOME

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Program Year 3 Action Plan HOME:

The City of Middletown is a Participating Jurisdiction (PJ) through a Consortium with Butler County. Butler County, as the lead agency is responsible for completing the HOME section on our behalf.

HOMELESS

Specific Homeless Prevention Elements

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
- Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
2. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
3. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
4. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 3 Action Plan Special Needs response:

It is expected that one agency in the Butler County Housing and Homeless Coalition will apply for and receive funding on behalf of the coalition through the Balance of State Continuum of Care process.

Homelessness: Objectives identified in the Middletown strategic plan are to review the proper level of section 8 vouchers to assist low income or homeless individuals and families in securing safe and affordable housing and coordinate with local and regional governments and service agencies to provide technical assistance for homeless service providers. This is accomplished county-wide through the coalition. The Butler County Housing and Homeless Coalition is a wide ranging group of municipalities and non-profit providers working in coordination on homelessness. The members include the City of Hamilton, the City of Middletown, Butler County, Butler County Children's Services Board, Butler Metropolitan Housing Authority, Butler Behavioral Health-Workplace Associates, Legal Aid, Lifespan, Neighborhood Housing Services, Inc., S.E.L.F., Sojourner Recovery Services, Transitional Living, Faith Works, Inc., Hope House, Mercy Franciscan at St. Raphael, Serve City, the YWCA, the VA, and Butler County Success. This group meets monthly and provides multiple services to area homeless including not only shelter, but transportation, employment, mental health, and substance abuse services. The VA has become more active in the past year, reaching out to veterans and matching needs with services. These specific objectives were designed to meet the overall goal of providing the best assistance

for the homeless and those at risk of homelessness. The major obstacles to completing these steps are funding.

Chronic Homelessness: Butler County, including Middletown, have consistently low numbers of unsheltered individuals and families documented in the point in time counts. In order to end chronic homelessness, the City of Middletown, in conjunction with regional partners in the Butler County Housing and Homeless Coalition will continue to provide outreach and appropriate social services to assist the homeless. The Butler County Housing and Homeless Coalition administers 20 Shelter Plus Care vouchers to get chronically homeless individuals housed. Butler County administers 20 more Shelter Plus vouchers to assist Butler County chronic homeless.

Homeless Prevention: Services offered to residents of Middletown and Butler County include the Emergency Money Fund administered through St. Raphael. There are also funds available for emergency rent and utility payment through SELF, the local Community Action Program (CAP) agency. Additionally, Butler Metropolitan Housing Authority (BMHA) has a working relationship with Transitional Living who provides mental health assessment and permanent housing placement services.

Discharge Coordination Policy: Activities planned to implement a community-wide discharge policy begin with the Butler County Housing and Homeless Coalition. Homeless providers serving not just Middletown, but the entire county meet monthly and are developing a community-wide policy.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 3 Action Plan ESG response:

n/a

COMMUNITY DEVELOPMENT

Community Development

Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

1. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 3 Action Plan Community Development response:

(Goal numbers are as of the end of the calendar year 2011)

Priority Need	Priority Need Level	5 Yr Goal Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Acquisition of Real Property (NSP)	Medium	3/4	4	100
Disposition	Medium	3	0	0
Clearance and Demolition (CDBG funds only)	High	40/22	30	55
Clearance of Contaminated Sites	Low	0	0	0
Code Enforcement (Number of Inspections)	High	8000/2414	2000	30
Public Facility (General) - TOTAL	Medium	27/23	15	85
Senior Centers	Low	0	0	0
Handicapped Centers	Low	0	0	0
Homeless Facilities	Medium	1	0	100
Youth Centers	Medium	1	0	0
Neighborhood Facilities	Medium	1	1	0
Child Care Centers	Medium	1	0	0
Health Facilities	Low	0	0	0
Mental Health Facilities	Low	0	0	0
Parks and/or Recreation Facilities	Medium	2/1	0	50
Parking Facilities	Low	0	0	0
Tree Planting	Medium	50	0	0
Fire Stations/Equipment	Low	0	0	0
Abused/Neglected Children Facilities	Medium	1	0	0
Asbestos Removal (housing units)*	Medium	20/22*	20	100
Non-Residential Historic Preservation	Medium	0	0	0
Other Public Facility Needs	Medium	0	0	0
Infrastructure (General) - TOTAL	Medium	1500	1000	0
Water/Sewer Improvements	Low	0	0	0
Street Improvements (lineal feet per lane)	High	1000/1208	0	100
Sidewalks (lineal feet)	Medium	500	0	0
Solid Waste Disposal Improvements	Low	0	0	0
Flood Drainage Improvements (lineal feet)	Low	0	0	0
Other Infrastructure	Medium	0	0	0
Public Services (General) - TOTAL	Medium	410/73	45	18
Senior Services	Low	0	0	0
Handicapped Services	Low	0	0	0
Legal Services – people served	Medium	200/35	20	18
Youth Services – people served	Medium	50	0	0
Child Care Services – people served	Medium	10	0	0
Transportation Services	Low	0	0	0
Substance Abuse Services – people served	Medium	10	0	0
Employment/Training Services – people served	Medium	10	0	0
Health Services	Low	0	0	0
Lead Hazard Screening – people served	Medium	5	0	0
Crime Awareness – people served	Medium	50	0	0
Fair Housing Activities – people served	High	75/35	20	47
Tenant Landlord Counseling – people served**	Medium	5/3	1	60
Other Services	Medium	0	0	0
Economic Development (General) - TOTAL	Medium	16	0	0
C/I Land Acquisition/Disposition	Medium	5	0	0

C/I Infrastructure Development	Low	0	0	0
C/I Building Acq/Const/Rehab	Medium	3	0	0
Other C/I	Medium	0	0	0
ED Assistance to For-Profit	Low	0	0	0
ED Technical Assistance	Medium	3	0	0
Micro-enterprise Assistance	Medium	3	0	0
Other	Medium	0	0	0

*Asbestos removal goals include abatement due to rehabilitation and/or demolition

**Counseling performed by subrecipient H.O.M.E. and is education outreach to the public and/or the Board of Realtors

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 3 Action Plan Antipoverty Strategy response:

Over the next year the City of Middletown will attempt to reduce the number of poverty level families through the following methods:

- 1) *Stabilizing the housing base through code enforcement, demolition, emergency housing repair and homeownership assistance programs. The City realizes that without stable housing, it is difficult to focus on educational attainment and employment goals.*
- 2) *The Economic Development Department will continue to focus on creating and maintaining quality jobs that will enable individuals to rise from poverty to self sufficiency.*
- 3) *Provide social, educational, and networking activities through the Community Center.*

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

1. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

Non-homeless special needs such as senior services, mental services, services for persons with HIV/AIDS, and Alcohol and Drug treatment are all extremely important to the City of Middletown. However, due to extremely limited resources, the City of Middletown has chosen to focus primarily on neighborhood revitalization.

The Middletown Area Community Coalition – an organization funded as a collaboration between the City, the Community Foundation and the United Way- will assist many of these service providers in identifying and securing state, federal and private sector funding for services.

Housing Opportunities for People with AIDS

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on the accomplishments under the annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 3 Action Plan HOPWA response:

n/a

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 3 Specific HOPWA Objectives response:

n/a

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Fair Housing

Program Year 3 Fair Housing response:

The City of Middletown is committed to providing a housing environment that is free of any discrimination whether real or apparent. A portion of the FY 2012 CDBG budget is being utilized to fund Legal Aid Society of Southwest Ohio, LLC and Housing Opportunities Made Equal (H.O.M.E.). Among other things, Legal Aid provides legal advice and counseling to those individuals who feel they have been discriminated against and provides legal representation to those individuals who otherwise may not be able to afford it. H.O.M.E. provides investigative services into landlords who have been reported by individuals who feel they were discriminated against. If a case is validated, H.O.M.E. will inform the landlord of their violation and laws that prevent such activity. Where possible, H.O.M.E. will work with the individual and the landlord to mediate a resolution. In rare cases where a resolution cannot be determined, H.O.M.E. will assist the individual by referring them to the appropriate places (such as Legal Aid) in pursuing the case legally if they so desire. H.O.M.E. also distributes educational materials regarding fair housing laws and requirements to realtors, lenders, and landlords.

The City of Middletown will continue to fund both of these organizations in 2012 and will continue to look for other resources available to promote fair housing.

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
HOME INVESTMENT PARTNERSHIPS (HOME) PROGRAM
PY 2012 PROJECTED BUDGETED USE OF FUNDS (5/1/2012 - 4/30/2013)

	<u>CDBG</u>	<u>HOME</u>	<u>TOTAL</u>
<u>Housing Revitalization</u>			
Down Payment/Closing Cost Assistance		\$324,000	\$324,000
Emergency Repair Program (PWC)	\$50,000		\$50,000
Volunteer Improvement Program (V.I.P.)	\$40,000		\$40,000
Rehab Program Delivery	\$40,000 a		\$40,000
Category Total	\$130,000	\$324,000	\$454,000
<u>Public Services</u>			
Fair Housing: H.O.M.E. (Matrix Code 21D)	\$5,000		\$5,000
Legal Aid of Greater Cincinnati	\$10,000		\$10,000
Senior Center	\$5,000		\$5,000
Category Total	\$20,000	\$0	\$20,000
<u>Historic Preservation</u>			
Middletown Cemetery		\$7,000	\$7,000
Category Total	\$7,000	\$0	\$7,000
<u>Public Facilities & Improvements</u>			
Playground Equipment	\$50,000		\$50,000
Street Paving	\$100,000		\$100,000
Category Total	\$150,000	\$0	\$150,000
<u>Neighborhood Revitalization</u>			
Code Enforcement	\$326,565		\$326,565
Demolition	\$275,000		\$275,000
Category Total	\$601,565	\$0	\$326,565
<u>GRANTS MANAGEMENT</u>			
Planning/Program Administration	\$175,316 b	\$36,000	\$211,316
Category Total	\$175,316	\$36,000	\$211,316
Estimated Unliquidated Funds	\$457,000		
Estimated PY2012 Grant amount	\$626,881		
TOTAL	\$1,083,881	\$360,000	\$1,168,881

a.) Includes legal fees & Rehab Program Delivery b.) Admin allocation (\$125,316) + estimated
\$50,000 in PY2011 Unliquidated Admin

CDBG 2012 Substantial Amendment

City of Middletown

(B-12-MC-39-0013)

This notice is being published to amend activities pertaining to the revolving loan fund described in the City of Middletown's 2010-2014 Consolidated plan. The activities are being amended due to local economic factors such as vacancy rates and the number of foreclosures.

The City of Middletown would like to amend the following:

Currently in the Consolidated Plan: *Revolving Loan Program* – As of February 2009, the City has 43 outstanding no interest/low interest loans totaling just over \$800,000 that have been used to rehabilitate over 50 properties in Middletown. During this Plan period, the Revolving Loan Fund will be utilized to offer low/no interest loans to eligible homeowners for rehabilitation expenses and sidewalk/curb/gutter repairs and dead tree removal in the target neighborhood each year.

As Amended: The City of Middletown will utilize the revolving loan fund to provide exterior rehabilitation to properties that are sitting vacant due to the foreclosure crisis. In these instances, neither the bank, nor the current/previous owner claim ownership to the property so it continues to deteriorate. The City would use the courts to permit access to the property to abate code violations. The cost of the rehabilitation would then be assessed on the property at 2.5 times per the local ordinance.

Further details on the amendment are enclosed which includes everything that was sent to the HUD field branch to review for approval and to ensure compliance with the regulations. After discussion with our HUD Field Branch Representative, we both agreed that compliance with the national objective would fall under Low-Mod Area (24 CFR 570.208(a)(1)) and the activity would be eligible under interim assistance activity (24 CFR 570.201(f)(2)).

Citizen Comments Period:

This amendment is being submitted as part of the PY2012 Annual Action Plan. The City placed a legal in the Middletown Journal on January 4th and January 11th and a regular ad ran January 6, 2012 and had copies of this amendment available at the public library and senior center. On January 17, 2012, there was a public hearing regarding this amendment as well as the PY2012 Annual Action Plan. The minutes are attached. The 30 day comment period was from January 17, 2012 to February 16, 2012. Written comments may be sent by mail or dropped off to:

City of Middletown
Community Revitalization Dept
One Donham Plaza
Middletown, OH 45042

Citizen Comments received:

TBA

Approved By:

X _____ Date: _____
Judith A. Gilleland – City Manager

X _____ Date: _____
Doug Adkins – Community Revitalization Dept. Director



COMMUNITY REVITALIZATION DEPARTMENT

May 19, 2011

U.S. Department of Housing & Urban Development
Office of Community Planning & Development
Attn: Mr. Jeffrey Idom, CPD Representative
200 North High Street, 7th Floor
Columbus, Ohio 43215

Dear Mr. Idom,

The City of Middletown believes that the proposal below to use Revolving Loan Funds for Interim Assistance in resolving an Urgent Need is in compliance with HUD regulations and is a legitimate and compliant use of the City's Revolving Loan Fund. The City is seeking HUD review of this proposal for comment and listing of any possible regulatory issues that HUD sees with the proposed actions. The City asks that HUD respond within 60 days if possible so that, if approved, the emergency conditions described below can receive immediate attention.

Introduction

The City of Middletown has assembled a wide variety of planning and implementation tools to deal with deteriorating neighborhoods. These resources have produced the following housing policies and strategies for the City:

Existing Housing Policies/Strategies

To thrive, Middletown must become an integrated part of the larger metropolitan area including Dayton and Cincinnati with a more diversified economic base relying less on manufacturing as the primary economic activity and more on office and service-oriented employment. The city must confront the degrading forces of an obsolescent housing supply, brownfields, underutilized commercial buildings and population loss in the older parts of the city.¹

¹ Middletown Master Plan, 2005-2010, p. 2-3.

A. Neighborhood Revitalization Strategy

From the City Master Plan:

Neighborhoods are the basic building blocks of a community. One neighborhood by itself should have all the elements of a village with housing, parks, schools, shopping, employment and civic uses, etc. A new, more comprehensive strategy must be enacted to overcome market forces. Given the condition of some neighborhoods, reliance on the private sector to turn undesirable neighborhoods around is an unlikely strategy. Public sector leaderships and incentives are needed to entice private sector participation through a comprehensive multi-year revitalization process. All blighting influences must be removed and housing units must meet the minimum building code before a neighborhood's revitalization process can be concluded. Fixing one or two problem properties will not bring about the holistic change required to develop a functional neighborhood.²

This strategy will require a proactive approach and a concentration of resources into select neighborhoods. This deliberate concentration of resources, if implemented, will be a policy shift from using available resources citywide on a first come, first serve basis much like CDBG dollars have been used. The steps to implement the revitalization strategy [are]:

- Prepare a sustainable neighborhood indicators database to identify healthy neighborhoods, neighborhoods in transition and degraded neighborhoods. Though classification could be done on visual inspection alone, the real underlying trends at the neighborhood level will not be known until a comprehensive analysis of available data is undertaken. Review of current physical conditions includes proximity to highways, public transportation, waterways, industrial areas, parks and playgrounds, and the condition of public improvements including sidewalks, streets, street lighting and parking. Attention should be given to the City's perception of the neighborhood and any ongoing efforts by residents to improve the neighborhood.³

This was completed in the development of the 2010-2014 HUD Consolidated Plan. The following indicators were used to evaluate each Middletown neighborhood:

1. Total population count
2. Youth; number of individuals under the age of 20 years
3. Elderly population; number of individuals over the age of 65 years
4. Total number of housing units
5. Area in acres

² Middletown Master Plan 2005-2010, p. 5-4.

³ *Affordable Housing and Urban Development in the United States*, Willem Van Vliet. © 1997, Sage Publications Inc., 106-107.

6. Percent of owner-occupied as a percentage of total housing units
7. Average household size; number of persons per household
8. Crime; number of crimes reported
9. Density of population per acre
10. Percent of housing units without complete kitchen and/or plumbing facilities
11. Percent of households with income below median household income of \$39,600
12. Percent of vacant housing units
13. Number of temporarily obsolete, abandoned or derelict structures
14. Foreclosure risk; HUD calculated ranking (1 to 10) of the risk that a neighborhood has for foreclosed or abandoned homes

The next step in the Master Plan is to:

- Present the sustainable neighborhood indicators data to a broad spectrum of public, local, county, and school officials; business leaders and key stakeholders; residents; and potential partners from lending institutions, real estate, and for profit and not for profit housing development organizations⁴.

This was accomplished through the public participation period required by HUD and by review and recommendation from the Consolidated Planning Committee.⁵

After revisions made through the public participation process, the Master Plan states to:

- Use the data to select and prioritize neighborhoods for targeted revitalization. The selected neighborhood should be based on criteria important to the community and:
 - o Be in obvious decline or transition
 - o Be located adjacent to a healthy neighborhood as deemed as such by the community reinvestment committee
 - o Be large enough to achieve a critical mass of change. Smaller areas than one-quarter square mile will not change market perceptions. The areas can be larger but should not exceed one-half square mile.
 - o Be assimilated in with the adjacent healthy neighborhood after revitalization is complete or it must be able to stand as its own compact area that is supported by the market.⁶

⁴ Middletown Master Plan 2005-2010, p. 5-5.

⁵ The Consolidated Plan Committee included three Council members, representatives from United Way, the Butler County Homeless Coalition, Neighborhood Housing Services of Hamilton, Inc., Keep Middletown Beautiful, and the Community Revitalization Director, the HUD Program Administrator, the Planning Director, and a Middletown Police Department Lieutenant.

⁶ Middletown Master Plan, 2005-2010, Targeted Neighborhood Revitalization Strategy, p. 5-5; *see also* Housing and Neighborhoods Objectives and Strategies, Objective HN 1, p. 5-12.

- Preserve and protect currently healthy neighborhoods that might be at risk – encourage reinvestment, work with financial institutions, home improvement stores, and residents.⁷ Create policies and programs for strong neighborhoods to prevent decline. Use proactive code enforcement. Maintain strong neighborhood anchors such as churches, institutions, schools and parks. Enact a landlord registration or licensing program.⁸
- Where possible, select a neighborhood that has or will receive an infusion in capital investment to use as a springboard for revitalization. Middletown City School District's new schools initiative is an example. Similarly, consider neighborhoods that have one or more key anchors such as places of worship, employment centers, neighborhood business districts, historic or unique structures or districts, or parks, etc. These elements must be provided as part of the revitalization effort if not present beforehand consistent with the Neighborhood Design Standards.⁹

After review of the indicators above, each neighborhood was assigned an overall stress level. Overall Neighborhood Stress Scores equally weighed the age of housing, the percentage of substandard housing, the percentage of vacant units, the percentage of low-income households, the percentage of substandard housing, and the incidences of crime. Based on the score for each neighborhood, each neighborhood was classified as exhibiting Below Average Stress, Above Average Stress, High Stress, Very High Stress or Extreme Stress.

The decision was made by staff to “draw a line in the sand” at the Above Average Overall Stress level to stop decline and stabilize each neighborhood, and then to circle back to tackle neighborhoods in higher distress.¹⁰ The 2010-2014 HUD Consolidated Plan identified and prioritized Above Average Overall Stress neighborhoods.

⁷ Middletown City Council, Agenda 2009.

⁸ Middletown Master Plan 2005-2010, Housing and Neighborhoods Objectives and Strategies, Objective HN 5, p. 5-16.

⁹ Middletown Master Plan, 2005-2010, Targeted Neighborhood Revitalization Strategy, p. 5-5.

¹⁰ See also, Middletown Master Plan 2005-2010, Housing and Neighborhoods Objectives and Strategies, at HN 3.2, and HN 5, pp. 5-15 to 5-16.

Target Revitalization Neighborhoods with Above Average Overall Stress¹¹

Neighborhood	Total Housing Units	General Street Conditions	Flood Plain?	In a Historic District?	Overall Total Crime	% Vacant Housing	Neighborhood Assets	Overall Rank
Highlands	948	Poor	No	Yes	Moderate	4.00%	Goldman Park; Gladdell Park; Dillman's supermarket	2
Prospect	674	Fair/Poor	No	No	Moderate	8.00%	Michigan Park, BC Adult Training Ctr.	6
Harlan Park	39	Fair	No	No	Lower	9.00%		1
El Dorado /Williamsdale	384	Fair/Poor	No	No	Lower	4.04%	Bulls Run Arboretum	2
Meadowlawn	568	Poor	No	No	Lower	9.51%	Whitney Park, Woodside Cemetery Yankee Park, Garfield School	5
Lakeside	573	Fair	No	No	Moderate	9.08%	Lakeside Park	5
Sunset/Park Place	1323	Fair	No	No	Moderate	6.5%	Sunset Park, Miami Park	3
Wildwood	611	Poor	No	No	Lower	4.58%	Wildwood Elementary, St. John XXIII, Marsh Supermarket, University Park	4
Douglas	923	Poor	No	No	Moderate	11.48%	Com. Center, Douglass Park, Washington Park,	1
Dixie Heights	697	Fair	No	No	Moderate	4.88%	Maple Park, Dixie Hgts Park	4

The City Master Plan states that after prioritizing and selecting a target neighborhood(s) for revitalization, the City should develop a revitalization plan for the target neighborhood.¹²

¹¹ 2010-2014 HUD Consolidated Plan, Table 23.

¹² Middletown Master Plan 2005-2010, p. 5-6.

- Initial projects should have a tremendous impact on the neighborhood to demonstrate the city's intent to make a real and lasting change and as means to attract interest and bolster resident confidence. Examples include the acquisition and demolition of a brownfield property or undertaking a high quality infill development project at a highly visible location.
- Select actions based on needs and opportunities. One portion of the neighborhood may require wholesale acquisition, demolition and clearance. Other areas may need rehabilitation while others may need a combination of all strategies.¹³ Implement the plan using all available tools and resources. Land bank blighted and nuisance properties as open space. Upgrade infrastructure where needed and provide high speed communications infrastructure. Purchase existing structures and rehab or demolish and sell for new housing.¹⁴ Work with banks, non-profit housing developers, and consider down-payment assistance. Incentives for redevelopment could include: price breaks for city owned lots, reduced permit fees, low interest construction loans, down-payment and closing cost assistance.

The Community Revitalization Department developed the 2010-2014 HUD Consolidated Plan to be consistent with the City Master Plan Strategic Goals:

Consolidated Plan Priority 3a - Clearance and Demolition¹⁵

Goal: Demolition and clearance of vacant, abandoned, deteriorated and unsafe commercial and residential structures.

Objective: Utilize CDBG and NSP funds to demolish dilapidated and dangerous structures.

To date, the City utilized NSP funds to demolish over 40 of the City's most blighted residential structures and one large commercial structure downtown.

Consolidated Plan Priority 1a - Residential Rehabilitation¹⁶

Goal: To improve the condition of owner-occupied housing stock by providing targeted rehabilitation assistance to housing units consistent with the City Master Plan and the Neighborhood Study.

¹³ *Id.*

¹⁴ Middletown Master Plan 2005-2010, Housing and Neighborhood Objectives and Strategies, p. 5-13.

¹⁵ See e.g., Middletown Master Plan 2005-2010, at Chapter 5, Housing and Neighborhoods, Housing and Neighborhoods Objectives and Strategies, 1.5.2, 2.2.3, 3.1.3, 3.2.3, 4.4.4.

¹⁶ See e.g., Middletown Master Plan 2005-2010, at Chapter 5 Housing and Neighborhoods, Housing and Neighborhood Objectives and Strategies, 1.5.5, 3.2.2.

Objectives:

1. Rehabilitate single family owner occupied housing units using the Neighborhood Study to select target neighborhoods.
2. Provide adequate funding for emergency home repairs using CDBG funds.

The City is utilizing almost \$1.5 million in Neighborhood Stabilization Program funds to purchase and rehabilitate vacant single family homes in identified target neighborhoods to return those properties to productive use as owner- occupied units. The City partners with People Working Cooperatively to assist in emergency repairs (furnaces, roof patches, etc.) for low income families using CDBG funds. The City also implemented the Volunteer Improvement Program, whereby the City partners with low income homeowners to assist in deferred maintenance repairs. The City provides a grant for material costs and the homeowner and/or volunteer labor performs the deferred repairs.

Consolidated Plan Priority 1b - Home Ownership¹⁷

Goal: To create stable neighborhoods by increasing homeownership opportunities.

Objective: Use HOME funds to provide downpayment and closing cost assistance to low and moderate income first time homebuyers in target areas dictated by the Neighborhood Study. Use Neighborhood Stabilization Program funds to select rehabilitation projects that stabilize individual streets by putting vacant residential properties back into productive use with new homeowners.

In the 2010 HOME program year budget, we allocated \$255,000 in downpayment assistance to encourage homeownership in Middletown. We are providing higher levels of assistance in target neighborhoods to more quickly occupy and stabilize those Above Average Stress neighborhoods.

As stated in the Master Plan:

- Implementation will require several distinct actions, programs, incentives, and partner involvement. The first strategy to effect change is strong property code enforcement. Unresponsive property owners with code violations must be encouraged via fines and court fees to fix problems or sell.

The 2010-2014 HUD Consolidated Plan incorporates code enforcement as a Strategic Plan Objective:

¹⁷ *Id.* at 4.3.3.

Consolidated Plan Priority 1c - Code Enforcement¹⁸

Goal: To improve the condition of existing housing stock and commercial property and leverage private investment in the clean up of deteriorated structures.

Objectives:

1. Expand housing code enforcement efforts during the period 2010-2014 to ensure that renters, owners, at risk homeless and other persons with special needs live in safe, decent housing that complies with codes by using CDBG funds; bring all residential property into compliance by the end of the Plan period; Remove or abate blighted commercial property as funding permits.
2. Enforce the existing city housing code by utilizing criminal and civil remedies to force compliance or abatement with liens consistent with the Neighborhood Study.

During 2008, a city-wide survey was completed that showed 2300 residential properties (over 10% of the housing stock) were not in compliance with the property maintenance code.¹⁹ After a year of working on voluntary compliance, the City started 2010 with the remaining code violations:

Code Enforcement Violations²⁰

Number of Residential Properties	Condition Rating	Criteria
	1 In Compliance	The structure, yard, walks and steps are well maintained and no exterior code violations are apparent – in compliance.
+- 1379	2 Minor Repair	Minor maintenance tasks need to be performed; spot painting of exterior siding, trim, doors, gutter and/or downspouts; minor repairs to steps, yard, walks, driveways, fences
305	3 Major Rehabilitation	More extensive repairs needed. Replace items such as windows, doors, roof, porch and rebuilding of sections of the foundation and/or chimney may be necessary
25	4 Dilapidated and Occupied	The rehabilitation needs of these structures are similar to condition 2 but the scope and volume are such that reinvestment is not practical
18	5 Condemnable and Vacant	The entire structure is unsound and unsafe. Cost to bring exterior to minimum code standards would exceed 60% of the value of the home

¹⁸ See e.g., Middletown Master Plan 2005-2010, Chapter 5, Housing and Neighborhoods, Housing and Neighborhoods Objectives and Strategies, 2.3.1, 4.1.1, and HN 5.2.

¹⁹ See e.g., Middletown Master Plan 2005-2010, Chapter 5, Housing and Neighborhoods, Housing and Neighborhoods Objectives and Strategies, 3.1.1 and 3.1.2.

²⁰ 2010-2014 HUD 5 Year Consolidated Plan, CDBG, Table 25.

The City worked with property owners voluntarily in 2009 to bring several hundred properties back into property maintenance compliance. The City partnered with local churches in May 2010 to complete repairs on 50 homes in just four days. In July 2011, Group Work Camp Foundation will bring another 400+ volunteers to Middletown for one week to make repairs to 70 low income, non-compliant homes.

Notifications have been sent out in the target neighborhoods letting landlords and homeowners know that the target neighborhoods will receive violation letters, with 30 days to return their property to compliance or face possible court action.²¹ Unresponsive trash and grass nuisance properties are being abated with the costs of City abatement being assessed to the property taxes for the parcel.²² We have implemented mandatory fines for noncompliance and have hired a process server to reach hard to serve violators and out of town owners/landlords.

In addition to code enforcement efforts, the Master Plan lays out the following revitalization design principles:

Key Neighborhood Revitalization Design Principles.²³ As we look to revitalize Middletown one neighborhood at a time, each neighborhood's plan should have the following elements:

- Neighborhood Compact Form. Neighborhoods are compact, largely self contained, pedestrian pockets defined by a quarter mile radius or 5 minute walk. Self contained neighborhoods should be no more than 160 acres in land area with recognizable edges and centers.
- Neighborhood Centers and Edges. Neighborhoods should have clearly recognizable centers and edges to create a strong and identifiable image. Centers serve as the focal point of the neighborhood; edges delineate one unique neighborhood from another. Centers generally are a cluster of nonresidential buildings and uses that serve as the area of primary socialization. Small scale commercial operations, parks, schools, community centers, institutional and civic uses can combine in whole or in part at the center. Edges are typically found at arterial perimeter roads or adjacent to natural features. Centers and edges must have unique architecture that helps define the greater neighborhood. Land uses in centers and edges should be diverse to serve the needs of neighborhood residents. Well defined centers and edges are a strong source of neighborhood pride and enhance neighborhood desirability and property values.

²¹ See Middletown Master Plan 2005-2010, Chapter 5, Housing and Neighborhoods, Housing and Neighborhoods Objectives and Strategies, at 4.1.1 and HN 5.4.

²² See Middletown Master Plan 2005-2010, Chapter 5, Housing and Neighborhoods, Housing and Neighborhoods Objectives and Strategies, at 4.1.3.

²³ See Middletown Master Plan 2005-2010, Chapter 5, Housing and Neighborhoods, Key Neighborhood Revitalization Design Principles, at 5-7 to 5-8.

- **Network of Walkable Streets.** Edges and centers must be well maintained and enhanced with streetscape improvements and linked by a finely woven network of interconnected streets. Streets must be detailed for pedestrian use to provide increased transportation choice and provide alternative routes to avoid congestion on a few neighborhood roads. Streets shall be narrow to slow traffic and create more comfortable pedestrian environments. Streets should be treated as part of the public open space system and include neighborhood defining elements such as sidewalks, neighborhood “sign toppers” to identify the neighborhood on street signs, street trees, pedestrian oriented lighted, art, and street furniture.
- **Building Scale and Placement.** Urban neighborhoods are typically built on small narrow lots. Structures are located close to the road and building heights rarely exceed three stories. New construction shall be compatible with the building scale, massing, architecture and building placement of the surrounding neighborhood. Smaller buildings, since they can be seen from the street and sidewalk, provide an important opportunity for embellished architectural detail. Enhanced architecture creates a memorable image of place and lessens the need for landscape screening. Buildings shall be set close to the street to define public spaces and the street as opposed to excessively large setbacks that define parking lots. Buildings shall be easily accessed by automobile and by foot and be diverse in function to accommodate different uses over time in conjunction with changing neighborhood needs.
- **Parking.** Some Middletown neighborhoods were designed before the advent of the automobile while others were created when most families had just one. Revitalized neighborhoods must be retrofitted to accommodate more vehicle parking in a manner that is compatible with the neighborhood’s traditional form. On-street parking in the public realm is essential to reduce parking demand on private property. On-street parking also slows traffic down in neighborhoods and places motorists closer to front doors. Off-street parking shall be shielded and provided in close proximity to every building and not concentrated in one part of an area as to become the focal feature of the neighborhood. Consideration should be given to introducing small common parking areas like developers are providing next to higher-density single family attached homes. Alleys can also be utilized to provide rear parking that is convenient yet shielded from public view.
- **Mixed Land Use.** Neighborhoods shall have a balance of shopping, employment and housing opportunities. Neighborhoods with retail and office uses within the defined quarter mile radius are better

able to meet the every day needs of residents at convenient locations. Clustering uses at the neighborhood level saves energy and promotes walking. Buildings at the neighborhood center and edge shall be designated to accommodate multiple uses.

- Civic and Institutional Anchors. In addition to having a balance of retail and office, each neighborhood shall have adequate provision of public, institutional and civic uses (e.g. green squares, houses of worship, community buildings, etc.) Civic and institutional uses typically exhibit the strongest architecture in the neighborhood and serve as neighborhood landmarks.

The City chose the Douglass neighborhood as its first revitalization project because it is a gateway into the Community from Route 4, and it houses the Robert "Sonny" Hill, Jr., Community Center, a neighborhood landmark.

The Master Plan calls for:

- Public Open Space. Each neighborhood shall have an open space system that includes natural features, park facilities and formal open spaces to encourage resident congregation, socialization, and recreation. Open spaces serve as sources of community character, identity and pride. Well designed open spaces add value to neighborhoods. Town squares and greens are more formal places of open space organization than parks. They serve an important civic function by framing civic, institutional and commercial buildings around them.
- Diverse Housing Types and Price Points. Each neighborhood shall have a sufficiently diverse mixture of housing types at varying densities and price points to accommodate the full range of people needed to build and maintain a complete and real community. Diversity avoids monotonous cookie cutter subdivisions and large enclaves of people in the same socioeconomic class.²⁴
- Crime prevention will be accomplished in part through Environmental Design of the revitalized neighborhood employed to design out crime opportunities.²⁵ Develop a resident's association in the target neighborhood to work with the City in developing the neighborhood revitalization plan²⁶. In Cincinnati's Over-the-Rhine,

²⁴ Middletown Master Plan 2005-2010, p. 5-7, 5-12, 5-13.

²⁵ U.S. Conference of Mayors "Combating Problems of Vacant and Abandoned Properties; Best Practices in 27 Cities" (June 2006) Revitalizing Over the Rhine, Cincinnati, Ohio; *see also Design Out Crime: Creating Safe and Sustainable Communities*, Ian Colquhoun, © 2007, Elsevier Ltd.

²⁶ See, e.g., the Shreveport Louisiana Model Block Program, U.S. Conference of Mayors "Combating Problems of Vacant and Abandoned Properties; Best Practices in 27 Cities" (June 2006). Shreveport concentrated resources to make a visible, measurable impact in small geographic areas in targeted neighborhoods. Manageable geographic areas are selected through a neighborhood classification methodology using housing survey, infrastructure assessment and input from community participation to

the resident's association was called on to take responsibility for their neighborhoods' safety. Signs were placed throughout high crime neighborhoods stating "you are the eyes of Over the Rhine."²⁷ The Over the Rhine resident's association worked closely with the Community Oriented Police team and Special Operations to deal with specific neighborhood crime and drug problem areas.

The City Tree Commission has surveyed the city and compiled a listing of over 100 dead trees. Approximately eight of the trees were removed from low income properties during the May 2010 code enforcement blitz with area churches. As part of the rehabilitation of NSP homes, the City will replace needed sidewalks, curbs and gutters on renovated houses. The City hopes to be able to pave the streets in our target neighborhoods as funds permit.

The City has also utilized, on a smaller scale, additional resources such as infill reconstruction to fill holes in neighborhoods, property tax foreclosure to seize non-productive properties for renovation and reuse, and public nuisance law to abate threats to public health, safety and welfare.

Vacant residential lots in the City are being reviewed for use as possible Community Gardens, adopt-a-lot spaces, or sold or donated to a next door neighbor to improve yard size and reduce housing density. Other vacant lots will be redeveloped with minimal improvements to create planned green space in the neighborhoods.

Through all of these tools, we have made real progress on code enforcement issues, rehabilitation of housing, demolition of blighted housing no longer suitable for our housing stock, increased homeownership through downpayment assistance, and effective implementation of green space. The Courts have been of great assistance in holding non-compliant home owners and landlords accountable for the condition of their property.

The most recent development that we have been unable to make progress on is vacant homes that have been abandoned by the foreclosure crisis. These homes have generally been vacated by the previous owner over the last 18 months. The foreclosure process often has been completed to judgment but the property has not progressed to Sheriff's sale to make the lender whole again and to reoccupy the home with a new owner. While the property is in this state of limbo, no maintenance is being performed on the property. Being vacant for long periods has increased incidents of vandalism and trash dumping on the properties. The prior owner doesn't have the resources to deal with the deferred maintenance issues and the bank does not have title and will not make repairs.

assess the current condition of a neighborhood and establish the type of revitalization strategy that could be implemented to develop a plan of action that includes affordable housing, stimulation of private capital, employment opportunities for low and moderate income residents and crime prevention.

²⁷ U.S. Conference of Mayors "*Combating Problems of Vacant and Abandoned Properties; Best Practices in 27 Cities*" (June 2006), Revitalizing Over-the-Rhine, Cincinnati Ohio. In one year, violent crimes dropped 22%, while drugs/nonviolent crimes were reduced by 15%. Calls for service dropped dramatically. As improvements were made, people came out of their houses to support police and apply peer pressure to neighbors.

B. Obstacles to Meeting Housing Goals and Objectives

There are legal issues that have kept the City from effectively dealing with the public nuisances created by these vacant foreclosed homes. The City has developed the tools to gain legal access to these abandoned homes to make repairs, but obstacles to abating these nuisances include a lack of funding to make emergency repairs. It is estimated that to address all of the property needs in Middletown, we would require 10 times the current funding available.

Although Middletown is a great city overall, the City has concentrated pockets of poverty. As a result, the City's revenues from income tax and property taxes are down substantially. Of our approximately 50,000 residents, 41.4% (20,611) are ages 18 or younger or over 65. Almost 30% (14,825) of our residents are not in the labor force at all.²⁸ Almost 20% of Middletown's housing units are occupied by extremely low income (11.8%) or very low income (7.3%) renters. Another 11% are occupied by extremely low income (4.9%) or very low income (6.7%) owners. High levels of poverty, in addition to over 3,000 vacant or foreclosed properties²⁹ created in the last 18 months, continue to stress funds available to provide core city services including not only affordable housing, but also police and fire protection and upkeep of City infrastructure. The City is currently cutting \$3.7 million out of the 2011 and 2012 City budget due to state funding cuts to municipalities. The City of Middletown PY 2011 CDBG entitlement was reduced by \$126,000, further exacerbating revitalization efforts.

C. Revolving Loan Fund

Since the late 1970's the City has operated a HUD funded rehabilitation revolving loan fund to provide low interest and deferred loans to low income property owners to rehabilitate their residences. The loan currently has outstanding payable loans in the amount of \$705,495 and deferred loans in the amount of \$793,764. As of the end of April 2011, the revolving loan fund has an available balance of \$685,472.

The City of Middletown would like to use this fund on an interim basis to make deferred maintenance, public nuisance repairs to vacant properties in the City to stop the deterioration of our neighborhoods.

We believe that such a use of these funds would meet the Low Mod Area Benefit and the Urgent Need National Objectives.

²⁸ See 2010-2014 HUD Consolidated Plan, CDBG, at Table 1. Population Distribution, Table 2. Labor Force.

²⁹ US Census at:

http://factfinder.census.gov/servlet/ACSSAFFFacts?_event=ChangeGeoContext&geo_id=16000US3949840&_geoContext=&_street=&_county=middletown&_cityTown=middletown&_state=04000US39&_zip=&_lang=en&_sse=on&ActiveGeoDiv=&useEV=&pctxt=fph&pgsl=010&submenuld=factsheet_1&ds_name=ACS_2009_5YR_SAFF&ci_nbr=null&qr_name=null®=null%3Anull&keyword=&industry=

Sec. 570.208 Criteria for national objectives.

The following criteria shall be used to determine whether a CDBG-assisted activity complies with one or more of the national objectives as required under Sec. 570.200(a)(2):

(a) **Activities benefiting low- and moderate-income persons.** Activities meeting the criteria in paragraph (a) (1), (2), (3), or (4) of this section as applicable, will be considered to benefit low and moderate income persons unless there is substantial evidence to the contrary. In assessing any such evidence, the full range of direct effects of the assisted activity will be considered. (The recipient shall appropriately ensure that activities that meet these criteria do not benefit moderate income persons to the exclusion of low income persons.)

(1) Area benefit activities. (i) An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low and moderate income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion.

In 2009, the City amended its Consolidated Plan to operate City-wide, as over 53% of Middletown residents met low and moderate income levels. As stated above, the City has over 3,000 vacant housing units. The vacant, deteriorating housing is causing wide spread problems throughout almost all of our neighborhoods including tall grass, dumping, increased vandalism, violations of the property maintenance code, squatting, and deteriorating neighborhood property values. By using the RLF City-wide for emergency repairs on vacant properties, the City gets a Low-Mod Area-wide Benefit through upkeep of our neighborhoods, protecting property values and neighborhood conditions.

We also believe this problem, caused by the Great Recession, qualifies as an Urgent Need.

(c) Activities designed to meet community development needs having a particular urgency. In the absence of substantial evidence to the contrary, an activity will be considered to address this objective if the recipient certifies that the activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which are of recent origin or which recently became urgent, that the recipient is unable to finance the activity on its own, and that other sources of funding are not available. A condition will generally be considered to be of recent origin if it developed or became critical within 18 months preceding the certification by the recipient.

The widespread deterioration of our neighborhoods with vacant housing in need of deferred maintenance repairs poses a serious threat to the health and welfare of the community. It is a recent phenomenon, which over the last 18 months became an urgent

problem throughout the City of Middletown. While the City has budgeted \$120,000 from the General Fund in 2011 to pay for mowing and trash removal on nuisance properties, given the budget cuts discussed above, there is no other source of funds to perform emergency repairs on these properties until they are sold at Sheriff's sale and a new owner can be held accountable for their upkeep.

We believe that use of RLF funds meets both of these National Objectives. We also believe that use of funds in this manner is an eligible activity.

Sec. 570.201 Basic eligible activities.

CDBG funds may be used for the following activities:

- (f) Interim assistance.
 - (2) In order to alleviate emergency conditions threatening the public health and safety in areas where the chief executive officer of the recipient determines that such an emergency condition exists and requires immediate resolution, CDBG funds may be used for:
 - (iii) The improvement of private properties.
 - (3) All activities authorized under paragraph (f)(2) of this section are limited to the extent necessary to alleviate emergency conditions.

The City Manager in this case would determine that abandoned vacant properties under the conditions described above constitute an emergency condition requiring immediate resolution, opening the way for RLF funds to be used for improvement of private property. The RLF is already set up for rehabilitation purposes and is being managed by 5/3rd Bank. We believe that this use is consistent with the regulations regarding RLF and rehabilitation projects.

We believe that use of the funds in the manner described meets the RLF regulations.

Sec. 570.513 Lump sum drawdown for financing of property rehabilitation activities.

Subject to the conditions prescribed in this section, recipients may draw funds from the letter of credit in a lump sum to establish a rehabilitation fund in one or more private financial institutions for the purpose of financing the rehabilitation of privately owned properties. The fund may be used in conjunction with various rehabilitation financing techniques, including loans, interest subsidies, loan guarantees, loan reserves, or such other uses as may be approved by HUD consistent with the objectives of this section. The fund may also be used for making grants, but only for the purpose of leveraging non-CDBG funds for the rehabilitation of the same property.

(b) Standards to be met. The following standards shall apply to all lump sum drawdowns of CDBG funds for rehabilitation:

- (1) Eligible rehabilitation activities. The rehabilitation fund shall be used to finance the rehabilitation of privately owned properties eligible under the general policies in Sec. 570.200 and the specific provisions of

either Sec. 570.202, including the acquisition of properties for rehabilitation, or Sec. 570.203.

Sec. 570.202 Eligible rehabilitation and preservation activities.

(a) **Types of buildings and improvements eligible for rehabilitation assistance.** CDBG funds may be used to finance the rehabilitation of:

(1) **Privately owned buildings and improvements for residential purposes;** improvements to a single-family residential property which is also used as a place of business, which are required in order to operate the business, need not be considered to be rehabilitation of a commercial or industrial building, if the improvements also provide general benefit to the residential occupants of the building;

(b) **Types of assistance.** CDBG funds may be used to finance the following types of rehabilitation activities, and related costs, either singly, or in combination, through the use of grants, loans, loan guarantees, interest supplements, or other means for buildings and improvements described in paragraph (a) of this section, except that rehabilitation of commercial or industrial buildings is limited as described in paragraph (a)(3) of this section.

(2) **Labor, materials, and other costs of rehabilitation of properties, including repair directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of existing structures, installation of security devices, including smoke detectors and dead bolt locks, and renovation through alterations, additions to, or enhancement of existing structures and improvements, abatement of asbestos hazards (and other contaminants) in buildings and improvements that may be undertaken singly, or in combination;**

Our plan would be operated in the following manner:

First, City inspectors have located and documented properties that are vacant and abandoned with deferred maintenance issues resulting in violation of the City's property maintenance and nuisance ordinances. A Notice of Violation has been created and served consistent with State and local law. Under the Notice of Violation, the owner and/or occupant were given a statutory time period to make repairs or to request an extension of time to complete repairs and return the property to compliance with local codes. Under Middletown Ordinance Section 1436.01, "All structures in violation of the International Property Maintenance Code, as adopted in § 1486.01, are hereby declared to be public nuisances and shall be abated as provided in the International Property Maintenance Code and this chapter." Our local nuisance codes also state that properties in violation are declared public nuisances. Under Ohio Revised Code § 3767.41, a building that is a public nuisance "means a building that is a menace to the public health, welfare, or safety...by reason of inadequate maintenance, dilapidation, obsolescence or abandonment."

In all cases listed above, the statutory time for repairs has passed. The prior owners have lost control of the property and lack the resources to make repairs to a property they no longer live in. The City also lacks the resources in the General Fund to make repairs and

abate the public nuisance. Under the local Ordinances, the Law Director may file a civil action for abatement to correct and abate the public nuisance on the abandoned property. The Court would then Order abatement of the public nuisance property and grant the City permission to enter the premises to make repairs sufficient to abate the nuisance, which also would be limited to the extent necessary to alleviate emergency conditions as specified in § 570.201(f)(3). We would structure the Court Order so that the City could re-enter the property as needed to maintain compliance with local codes until the property is reoccupied or sold at Sheriff's sale, giving us a new owner to hold accountable for upkeep. The City would enter the property and set up mowing and trash removal ongoing using General Fund money and lien the property according to the local Ordinance. The City would use the revolving loan fund to correct building deficiencies and deferred maintenance only sufficient to bring the property back into continuing compliance with local codes and alleviate the emergency conditions.

Under our local Ordinances, the cost of abatement (both nuisance and property repairs) are to be multiplied by two and one half times and placed as a tax lien on the property. We would set up two different liens. The General Fund lien would cover mowing and trash removal. The City would then multiply the RLF funds used for abatement of the nuisance and repair of deferred maintenance by 2.5x and place it as a separate lien on the property. We would set up a new "account" with the bank for each lien ("deferred loan") in our RLF to track return to the program fund. When the property is finally sold in the next couple years at Sheriff's sale, the lien would be paid off and the lien proceeds would be sent back to the RLF as program income to be used again for rehabilitation purposes.

We believe this meets the purpose of the RLF – rehabilitation. It is an interim problem of urgent need. This is an interim solution. We would recommend pursing this action as a policy through the end of our Consolidated Plan period (2014), with annual reviews and updates as part of each year's Action Plan. If the crisis is alleviated sooner than 2014, the funds can be reassigned to other rehabilitation projects furthering the goals of the City and the Consolidated Plan. By placing the RLF funds as a tax lien, the funds will be recaptured at some point in the near future (at Sheriff's sale) to be used again to benefit low and moderate income neighborhoods with rehabilitation needs.

We believe this proposal is a compliant use of the RLF under the regulations for the reasons stated above. We are asking that HUD review this proposal and comment on the appropriateness of this use of RLF funds and whether the actions proposed are in compliance with HUD regulations.

Thank you for your consideration.

Sincerely,

Douglas Adkins
Community Revitalization Director - City of Middletown

Cc: Thomas Bilodeau
Richard Hendershot



U.S. Department of Housing and Urban Development
Columbus Field Office
Office of Community Planning and Development
200 North High Street
Columbus, Ohio 43215-2499

JUL 14 2011

Mr. Doug Adkins
Director, Community
Revitalization Department
One Donham Plaza
Middletown, OH 45042

Dear Mr. Adkins:

SUBJECT: Change of use for Revolving Loan Fund

This letter is written to provide a response to the City of Middletown's request, of May 19, 2011, to use their Rehabilitation Revolving Loan Fund (RLF) to make repairs to single-family homes that have been abandoned. After our conference call on June 28, 2011, we understand the city plans to use the funds as Interim Assistance. Once all the necessary repairs have been done, the revolving loan funds would then go back to their original use. The city will continue to make the necessary upkeep of the properties with General Funds, which include but are not limited to trash removal and grass cutting. The city plans to recapture the Community Development Block Grant (CDBG) funds through a tax lien being placed on any property receiving assistance. This lien would be above any outstanding mortgage lien on the property. With the eventual sale of the property, the lien would be satisfied and the RLF would be repaid. The city feels that this would be an eligible activity under the Low-Moderate Area National Objective.

After careful review of this proposal, the Columbus HUD Office finds no reasons why this would not be an eligible activity of Interim Assistance. The city states the National Objective would be Low to Moderate Area, and our office concurs with the city. In 2009, the city amended its Consolidated Plan to operate citywide, as over 53 percent of Middletown residents met or were below low- and moderate-income levels. The city should follow all necessary regulations in regard to substantial amendments and the Citizen Participation process. Please refer to CFR 24 91.105 for these requirements.

If you have questions or require assistance on the programs administered through our office, feel free to contact Jeffrey Idom, Community Planning and Development Representative, of my staff, at (614) 469-5737, x8272.

Sincerely,

A handwritten signature in black ink, appearing to read "Jorgelle R. Lawson".

Jorgelle R. Lawson
Director
Office of Community
Planning and Development

cc:

Judy Gilleland
Kyle Fuchs

