

2022 ANNUAL ACTION PLAN
January 1 through December 31, 2022
B-19-MC-19-0005

Adopted: November 8, 2021



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Executive Summary

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

1. Introduction

The City of Council Bluffs is an entitlement community and therefore is qualified to receive financial assistance from the U.S. Department of Housing and Urban Development (HUD) on an annual basis. Specifically, the City qualifies for Federal entitlement funding made available through the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs. Past performance has demonstrated that the City has administered both of these programs efficiently and effectively.

To remain eligible for this funding, the City is required to prepare a HUD mandated Consolidated Plan. The Consolidated Plan requires the City to identify its housing and community development needs, come up with strategies for meeting those needs and prioritizing those needs. The Consolidated Plan includes a Five-Year Strategy and Annual Action Plans for each program year in the five-year strategy. The Annual Action Plan primarily presents a budget for proposed activities to be implemented during the course of each program year in the five-year strategy and to address needs identified as part of the overall five-year strategy.

This Consolidated Plan is for the Five-Year Strategy for the period beginning January 1, 2019 through December 31, 2023. The formula grant programs covered by this Consolidated Plan include only the Community Development Block Grant (CDBG). The Home Investment Partnership (HOME) Program funding and activities are outlined in the Omaha - Council Bluffs Consortium Consolidated Submission for Community Development Programs.

The City's fiscal year for these programs is January 1st through December 31st, and funding may be utilized to implement a variety of housing and community development activities. These must either: (1) provide benefit to low and moderate-income persons; (2) reduce or eliminate slum and blight conditions; or (3) address an urgent need. The goals of the formula grant programs covered by the Consolidated Plan and Annual Action Plan are: 1) to strengthen partnerships among all levels of government and the private sector so as to enable them to "provide decent housing"; 2) to establish, maintain, and "provide a suitable living environment" and 3) to "expand economic opportunities" for low and moderate income residents.

2. Summarize the objectives and outcomes identified in the Plan

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

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Generally, there are three objectives relative to program funding:

- **Creating (or Enhancing) Suitable Living Environments** Applicable to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.

- **Providing Decent Housing** Applicable to housing programs where the purpose is to meet individual family or community needs, and not programs where housing is an element of a larger effort (such as would otherwise be applied under the “Suitable Living Environment” Objective).

- **Creating Economic Development Opportunities** Applicable to activities that are related to economic development, commercial revitalization, or job creation.

Generally, three outcomes are relative to program funding objectives:

- **Availability/Accessibility** Applicable to activities that make services, infrastructure, housing or shelter available or accessible to low- and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the basics of daily living available and accessible to low- and moderate-income people.

- **Affordability** Applicable to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people, including the creation or maintenance of affordable housing; basic infrastructure hook-ups; or services such as transportation or day care.

- **Sustainability** Applicable to (multiple) activities or services that are directed toward improving communities or neighborhoods (to make them livable or viable) by providing benefit to low- and moderate-income people or by removing or eliminating slum or blighted areas.

In an effort to prioritize needs and efficiently allocate resources, the City collaborated with citizens, elected officials, public/private agencies, and nonprofit organizations to determine community development needs for FY2019-2023. The City’s community development objectives acknowledged were all listed as high priorities and were set forth in four general parts in the FY2019-2023 Annual Action Plans. The four parts are as follows:

1. Housing Development (Decent Housing and Suitable Living Environment) – The conservation and redevelopment of established neighborhoods and the preservation and expansion of their housing stock.
2. Economic Development (Economic Opportunity) – The revitalization of commercial properties and job creating projects that benefit low and moderate income people.

3. Public Services and Facilities (Suitable Living Environment) – The development of physical and human service projects that benefit low and moderate income people by non-profit organizations.
4. Administration – The efficient operation of the Community Development Program.

3. Evaluation of past performance

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

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Affordable Rental: The City has been working with a developer for a project located at 28th and 2nd Avenue with approximately 84 affordable multi-family units and some market rate townhomes. Another project located at Franklin Avenue and Bennett Avenue (Hillside Estates) will also have a mix of affordable and market rate single-family units with a total of 30 homes.

Down Payment Assistance for Affordable Owner-Occupied Units: In 2021, the City assisted two income-qualified household with down payment assistance (DPA) for the purchase of a new single-family home on an infill lot. Due to a lack of available lots, the number of units constructed is lower than previous years. The City has plans to use DPA on the affordable Hillside Estate lots next year to close the gap. The current amount of homebuyer assistance is up to \$30,000 per household, depending on the need.

Single-Family Rehabilitation: The Affected Properties Program is in its fifth year. The program guidelines state funds shall be used to rehabilitate the exterior and major systems of single-family homes that are owner-occupied units adjacent to other city projects to make the greatest impact. Unfortunately, Staff struggled to qualify owners meeting the above guidelines. In August 2019, the program changed to city-wide which has helped to increase interest. In 2021, 13 properties have completed the program with an additional nine that should be completed by the end of the year and another five properties have started but will most likely not be completed by the end of the year. These funds can be coupled with Lead Hazard Remediation properties and an additional three properties have utilized both funding sources.

The City also has a Safe Housing Program that preserves existing housing stock and stabilizes residential neighborhoods. This program is intended to provide immediate repair and correction of hazardous housing conditions. In 2021, 11 properties had been completed with this program.

Lead Hazard Reduction Remediation: In April 2019, the City finalized its contract with HUD for Lead Hazard Reduction (LHR) Program funds. In 2019, the program guidelines were developed and finalized. In 2021, six Lead Hazard Remediation properties were completed and additional two were started but will not be completed by the end of the year.

Home Modifications for Special Needs: In 2021, the City partnered with the League of Human Dignity (LHD) to complete one barrier removal project for a person with disabilities. Additionally, the City completed one bathroom modification for a person with disabilities as the City's own project. The City does not anticipate its partnership with the LHD in 2022, but will complete home modifications for special needs as the City's own projects. In 2021, the League's policy requirements proved to lengthen the timeline of projects, which did not match up with the City's expectations. Therefore, the City will be taking over the projects.

Persons Served at Meal Site: This area-wide benefit initiative serves one of the poorest census tracts in Council Bluffs. New Visions Homeless Services operates MOMH's Place which serves three meals per day to any person in need at no charge. In 2021, MOMH's Place served 109,588 and 13,215 sacked lunches meals, which was 73% of its 175,000 meals served goal.

Homeless Supportive Services: In the third year of the Consolidated Plan, Community Development partners provided housing to 1885 homeless individuals in its four shelters. This is 85% of the annual goal.

Housing Counseling: Through its partnership with Family Housing Advisory Services (FHAS), the City provides assistance for housing counseling to persons of LMI. This assistance is in the form of group classes and 1-1 counseling for new homebuyers, renters and credit builders. During the pandemic, in-person group classes were all cancelled. However, Homebuyer Education began to be offered virtually in March 2020 and has remained in place through 2021 as the virtual classes were well attended. This has continued to provide education to potential homebuyers. FHAS also offers a program for after home purchase counseling called Post Purchase Education workshops. Through the pandemic and into 2021, these have also continued through virtual outlets.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

To fund activities to be implemented each program year, the City invites funding applications each summer prior to the upcoming program year beginning January 1. All applicants are required to apply according to a prescribed format, including City departments, for-profit and non-profit entities. Specific efforts to broaden public participation include publicizing the availability of application forms in the City's local newspaper (the "Daily Nonpareil"), as well as posting them on the City's web page and at City Hall and at the library.

Applications are reviewed by the City's Community Development Advisory Committee (CDAC) and Community Development staff. CDAC serves as a forum for receiving public comments and providing information to the public on the preparation, implementation and evaluation on the City's Community Development Programs, in particular the City's CDBG and HOME Programs. The Committee is intended to provide broad-based community involvement and assures that those groups within the community

which may be most directly affected by various community development programs are represented in its process. The Committee formulates recommendations to the City Council which proposed activities should be funded and at what amount. The City Council may either accept, reject, or modify the Committee's recommendation(s) and directs that a draft Action Plan be prepared that is made available for at least a 30-day public review and comment period. A comprehensive schedule of the consolidated planning process, including public review/comment, hearing, and Council action dates is directly conveyed to all applicants.

5. Summary of public comments

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

The Community Development Advisory Council (CDAC) held three public hearings on the 2021 Annual Action Plan. The 2021 hearings took place on August 16, September 20 and September 27. In addition, City Council held a public hearing on the 2022 Annual Action Plan on October 11, 2021 utilizing estimated funds. The comments received in summary include the need for homebuyer counseling, fair housing services, foreclosure prevention counseling, financial education, affordable housing development, emergent basic needs assistance, affordable and accessible housing for vulnerable populations, neighborhood stabilization activities, Permanent Supportive Housing, housing for homeless individuals and families, and support services for the homeless.

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

All comments or views received during the public hearings were accepted. To date the Community Development Department has not received any citizen comments concerning the 2022 Annual Action Plan. If any comments are received on or before the expiration of the comment period, then they will be documented and addressed.

7. Summary

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	COUNCIL BLUFFS	
CDBG Administrator	COUNCIL BLUFFS	Community Development Department
HOPWA Administrator		
HOME Administrator		
ESG Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

City of Council Bluffs – Community Development Department

Courtney Harter, Housing & Economic Development Manager

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

1. Introduction

As stated previously, the City allows and encourages all citizens to be involved during the Consolidated Plan and/or Annual Action Plan process, with opportunities to express views on housing and community development needs and to participate in planning, reviewing and assessing actions to meet those needs proposed and performed by the City and to be informed prior to the time of any official action by the City Council. In particular, to include low and moderate income persons, particularly those living in slum and blight areas; low and moderate income neighborhoods; minorities; non-English speaking persons; persons with disabilities; residents of public and assisted housing developments; and residents of targeted revitalization areas in which developments are located. Also, to ensure that those groups most directly affected during the Consolidated Plan and/or Annual Action Plan process are represented, citizen participation will be accomplished by, but not limited to, the following methods:

1. Communicating with housing, emergency shelter and transitional housing organizations and community agencies that serve lower income clientele, minorities, non-English speaking persons and persons with mobility, visual or hearing impairments;
2. Communicating with nonprofit organizations, public agencies and other interested parties;
3. Encouraging, in conjunction with the City of Council Bluffs Community Development Department, the participation of public housing residents and assisted housing developments;
4. Advertising meeting(s)/hearing(s) in The Daily Nonpareil; or posting the notice at the Council Bluffs Public Library and City Hall; and
5. Ensuring that all citizens wishing to submit their view be offered an opportunity.

The Community Development Advisory Committee serves as a forum for receiving public comments and providing information to the public on the development or substantial amendment of the Consolidated Plan and/or Annual Action Plan and the development of the Annual Performance Report. The Advisory Committee works with the Community Development Department and other appropriate City Boards, Commissions and Councils in the development of the Consolidated Plan and Annual Action Plan.

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

In addition to the three Advisory Committee public meetings/hearings and as part of the City's analysis of impediments to fair housing, the City of Council Bluffs engaged in extensive consultation process with local public agencies, non-profits organizations and other interested entities in an effort to develop a community planning process. Community Development Department staff and the consulting team conduct individual agency interviews to identify current market needs and fair housing issues impacting

the various agencies and organizations. Organizations are invited in to discuss the needs of their agency and ways CDBG funds can benefit their initiatives.

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

The principle mechanism of coordination has to do with the City's participation in the in the Metro Area Continuum of Care for the Homeless (CoC) organization. The City considers the CoC (comprised as it is of individuals and agencies working directly and daily with homeless persons) the experts on homelessness and the City is in dialogue the CoC over how best to address those needs. Chronically homeless individuals and families are identified through outreach efforts of several agencies (Community Alliance, Heartland Family Services, the Nebraska Aids Project, Stephen Center, Siena/Francis House, the VA and Youth Emergency Services). Once identified, they are assessed by those same agencies and referred to what is currently the most appropriate of available housing options. Once housed, case managers work with the individuals and/or families to stabilize their situation and connect them to needed services. Housing subsidies often are needed as are the financial and other supports available through mainstream resources. The City is the jurisdiction's grantee for Shelter Plus Care, a 22 bed program serving chronically homeless individuals with mental illness (and often substance abuse issues). This is a program run in partnership with the Omaha PHA and Community Alliance. Other housing programs serving the chronically homeless are Heartland Family Service's Samaritan Program and the Veterans Administration Supportive Housing (VASH) program. Emergency shelters and other programs, including transitional housing facilities and the rapid re-housing program, also provide and/or work to secure housing for the chronically homeless en route to ending their homelessness. In all, there are currently and planned over 200 permanent supportive housing beds in this jurisdiction for chronically homeless individuals and families. Families with children are contacted initially or often by emergency shelters and/or by the many groups (listed in the previous paragraph) engaged in street outreach. They also are identified by homeless liaison workers employed by the public school system for the specific purpose of identifying homeless children (and families). Once identified, their situation is assessed and they are referred to the best of available housing options. This could mean referral to area shelters if they are living on the street or, if already in a shelter, to Heartland Family Service's rapid re-housing program or to area transitional housing and permanent housing options. Beds available for families with children, current and planned, are: 275 ES beds, 345 TH beds and 235 PSH beds.

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

The City of Council Bluffs does not receive ESG funds.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	New Visions Homeless Services
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from New Visions participated in the public meetings and consultation process. Continued support of homeless services providers, especially families with children and affordable housing development in general.
2	Agency/Group/Organization	HABITAT FOR HUMANITY COUNCIL BLUFFS
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from Habitat for Humanity participated in the public meetings and consultation process. Continued support for the creation of low-to-moderate income housing.
3	Agency/Group/Organization	Family Housing Advisory Services
	Agency/Group/Organization Type	Services - Housing Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from FHAS participated in the public meetings and consultation process. Continued support of housing counseling services, fair housing services and foreclosure prevention.
4	Agency/Group/Organization	MICAH House Corporation
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from the MICAH House participated in the public meetings and consultation process. Continued support of homeless services providers, especially families with children and affordable housing development in general.
5	Agency/Group/Organization	HEARTLAND FAMILY SERVICE
	Agency/Group/Organization Type	Housing Services - Housing Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from Heartland Family Service participated in the public meetings and consultation process. Continued support of homeless services providers and affordable housing development in general.
6	Agency/Group/Organization	CATHOLIC CHARITIES - DIOCESE OF DES MOINES
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from Catholic Charities participated in the public meetings and consultation process. Continued support of homeless services providers, especially for victims of domestic violence and affordable housing development in general.
7	Agency/Group/Organization	712 Initiative
	Agency/Group/Organization Type	Housing Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs Economic Development
	Agency/Group/Organization	712 Initiative

8	Agency/Group/Organization	New Community Development Corp DBA NeighborWorks Home Solutions
	Agency/Group/Organization Type	Housing Services - Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from NeighborWorks Home Solutions participated in the public meetings and consultation process. Continued support for the creation of low-to-moderate income housing.
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Representatives from the 712 Initiative participated in public meetings and consultation process. This is the first year they have participated in the creation of low-to-moderate low housing through HOME Funds.

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

Public and governmental health agencies were notified of the public meetings but did not attend. No further attempts to consult with them were sought.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Continuum of Care for the Homeless	The goals detailed in the Homelessness Strategy are consistent with the Omaha/Council Bluffs 10-Year Plan to End Homelessness. 1. Finish the Job of Ending Chronic Homelessness. 2. End Homelessness among Veterans. 3. Prevent and End Homelessness for Families, Youth, and Children. 4. Set a Path to Ending All Types of Homelessness. This is consistent with the following goals: 1) Comprehensive data supports and documents goals to end homelessness, as well as federal government indicators. 2) Prioritize transitional and permanent housing solutions for a wide range of subpopulations. 3) Agencies will provide culturally competent services to the homeless community without prejudice or bias. 4) Prioritize solutions for long-term homeless and persons with disabling conditions. 5) People in need have easy, immediate and appropriate access to all services including comprehensive mental, physical health care, and substance use recovery; and 6) People experiencing chronic homelessness receive housing and services specific to their needs. 7) A comprehensive case management team will successfully connect 85% of the chronic homeless population to stable housing. 8) Development of a Central Intake System. 9) Prevention of Homelessness will have a comprehensive prevention response to homelessness.

Table 3 - Other local / regional / federal planning efforts

Narrative

The City of Council Bluffs has a strong working relationship with the other member of the Consortium, Omaha, NE. Whether working out details of an agreement or considering broad, even regional issues related to the Consolidated Plan; and Council Bluffs maintain a strong working relationship.

Another strong relationship the City of maintains is with the Iowa Economic Development Authority and the Iowa Finance Authority. The City of Council Bluffs has a good working relationship with both state agencies. City often combines city-funded projects with their federal housing and community development funds on housing related projects in Council Bluffs, for example Low Income Housing Tax Credit Projects.

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

As stated previously, the Community Development Advisory Committee held four public meetings/hearings during the development of the 2022 Annual Action Plan that included the identification of community housing and non-housing needs, prioritization of needs, strategy development to meet identified needs and budget recommendations to implement those strategies. All meetings/hearings were posted at City Hall, and the library, the City's website, and advertised in The Daily Nonpareil. Additionally, housing, emergency shelter and transitional housing organizations and community agencies that serve lower income clientele, minorities, non-English speaking persons and persons with mobility, visual or hearing impairments, nonprofit organizations, public agencies and other interested parties were notified via email of the meetings/hearings.

Public comments were received during the comment period at the public meetings/hearings. All of the comments or views were accepted. The comments are attached and in summary include the need for homebuyer counseling, fair housing services, housing counseling activities, foreclosure prevention counseling, housing rehabilitation activities, new single family and multi-family housing development, single family and multi-family housing rehabilitation activities, housing for veterans, housing for the elder and persons with medical needs, housing for the homeless, domestic violence shelters, homeless prevention activities, affordable housing for very low to moderate income families, and affordable and accessible housing for vulnerable populations.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	On August 16, 2021 the City held a needs assessment meeting to discuss the CDBG allocation process and identify the needs in the community.	The following comments were received: There is a need in the community for assistance in fixing old home and a need for rental assistance. It was also stated that the homeless shelters are very much in need of operational assistance because of COVID-19 everything got used more than usual. Operational costs are increasing every year and there is a great need to provide safe housing to those transitioning out of shelter. They are sing a need for the increase in	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
				workshops for homebuyers. The shelters have also had a hard time finding and maintaining staff. Some that are hotel sheltering are not being able to provide much helps because they find people don't like to hotel shelter. There is hesitation in the homeless shelter to get vaccinated.		
2	Newspaper Ad	Non-targeted/broad community	Request of proposals was published on August 17, 2021 for CDBG and HOME funded activities.	No comments were received.	All comments were accepted.	
3	Public Meeting	Non-targeted/broad community	September 20, 2021, CDAC held a meeting to allow applicants time to present their request for funding.	Each applicant gave a presentation on their project.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Meeting	Non-targeted/broad community	September 27, 2021, CDAC held a ranking meeting to determine funding levels for applicants.	No comments were received from the public.	All comments were accepted.	
5	Public Meeting	Non-targeted/broad community	On October 11, 2021 City Council reviewed the recommended funding levels submitted by CDAC. The 2022 Annual Action Plan budget was reviewed and approved.	No comments were received.	All comments were accepted.	
6	Newspaper Ad	Non-targeted/broad community	On December 1, 2021, the Notice of Availability was published for public comment on the 2022 Annual Action Plan.	No comments were received.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The City of Council Bluffs is an entitlement community and therefore is qualified to receive financial assistance from the U.S. Department of Housing and Urban Development (HUD) on an annual basis. Specifically, the City qualifies for Federal entitlement funding made available through the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs. Past performance has demonstrated that the City has administered both of these programs efficiently and effectively. The formula grant programs covered by this Action Plan include only the Community Development Block Grant (CDBG). The Home Investment Partnership (HOME) Program funding and activities are outlined in the City of Omaha Annual Action Plan.

The City's fiscal year for these programs is January 1st through December 31st, and funding may be utilized to implement a variety of housing and community development activities. These must either: (1) provide benefit to low and moderate-income persons; (2) reduce or eliminate slum and blight conditions; or (3) address an urgent need. The goals of the formula grant programs covered by the Action Plan are: 1) to strengthen partnerships among all levels of government and the private sector so as to enable them to "provide decent housing"; 2) to establish, maintain, and "provide a suitable living environment" and 3) to "expand economic opportunities" for low and moderate income residents.

To remain eligible for this funding, the City is required to prepare a HUD mandated Consolidated Plan. This comprises both an Annual Action Plan and a Five-Year Strategy. The Annual Action Plan primarily presents a budget for proposed activities to be implemented during the course of the program year and to address needs identified as part of the overall five-year strategy. This FY22 Annual Action plan is for the period

January 1, 2021 through December 31, 2021 and comprises the fourth annual increment of the Five-Year Strategy plus an extra year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$1,000,000	\$1,671,667	\$0	\$2,671,667	\$1,489,668	Funds will be used for housing, public improvements, public services and economic development.
General Fund	public - local	Acquisition	\$100,000	\$0	\$0	\$100,000	\$0	Funds will be used for the elimination of slum and blight and infrastructure.
Other	public - federal	Housing	\$766,667	\$0	\$0	\$766,667	\$766,667	Funding available to assist in the remediation of lead in both owner and tenant occupied housing units.

Table 5 - Expected Resources – Priority Table

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

Federal funds the City receives through the CDBG and HOME Programs are used to leverage other federal, state and local resources to meet housing and community development needs.

It is estimated \$3.7 million in private support will be leveraged, annually, with the above-mentioned Federal dollars in support of human (public) service programs, projects, and initiatives undertaken in implementation of this strategic plan, tapping into local commitment of non-profit agencies delivering critical services to our community.

Additionally, City funding for most housing projects usually includes other funds to complete a project. Non-profit housing developers have been successful in obtaining Low Income Housing Tax Credit Investments. The Iowa Finance Authority supports local housing projects through the Low Income Housing Tax Credit program. The Iowa Economic Development Authority also provides housing assistance through a variety of programs. In addition, the City of Council Bluffs will use its gaming and capital improvement fund monies in support of the City's community development program and to undertake specific housing and community development projects. The City's funding has been successful at leveraging significant non-federal sources.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Not applicable.

Discussion

This Consolidated Plan and Annual Action Plans cannot achieve the goals identified using only the federal entitlement programs. Other Federal, State and local public funds must be included. While some project/actions may include primarily public funds, public funds alone would also be insufficient to achieve the goals of this plan and private funds from individuals, non-profit organizations and private organizations will be needed.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Development	2019	2023	Affordable Housing	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Affordable Housing	CDBG: \$606,066	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 60 Household Housing Unit Direct Financial Assistance to Homebuyers: 1 Households Assisted
2	Supportive Services for the Homeless	2019	2023	Homeless	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Homelessness	CDBG: \$95,800	Homeless Person Overnight Shelter: 2110 Persons Assisted
3	Public Facilities and Improvements	2019	2023	Homeless Non-Homeless Special Needs	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Homelessness	CDBG: \$68,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 900 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Slum and Blight Removal	2019	2023	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Slum and Blight Removal	CDBG: \$400,000	Buildings Demolished: 1 Buildings
5	Housing Counseling	2019	2023	Housing Counseling	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Affordable Housing	CDBG: \$30,000	Public service activities for Low/Moderate Income Housing Benefit: 440 Households Assisted
6	Meal Center Support	2019	2023	Homeless Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Non-Housing Community Development	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 5000 Persons Assisted
7	Neighborhood Development	2019	2023	Affordable Housing	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	Affordable Housing	CDBG: \$877,528 General Fund: \$100,000	Rental units constructed: 7 Household Housing Unit Homeowner Housing Added: 5 Household Housing Unit Buildings Demolished: 1 Buildings

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing Development
	Goal Description	Single Family Housing Rehabilitation - rehabilitation of single-family, owner-occupied housing units and emergency rehabilitation Down Payment Assistance for purchase of new housing unit Lot Acquisition and cleanup Lead Hazard Reduction - creation of lead safe housing units
2	Goal Name	Supportive Services for the Homeless
	Goal Description	Provide assistance to local homeless shelters
3	Goal Name	Public Facilities and Improvements
	Goal Description	Assist in the architectural and engineering fees as well as renovation of public homeless shelters
4	Goal Name	Slum and Blight Removal
	Goal Description	
5	Goal Name	Housing Counseling
	Goal Description	
6	Goal Name	Meal Center Support
	Goal Description	Support to the local free meal site within a high poverty neighborhood. Meets national objective through LMA.

7	Goal Name	Neighborhood Development
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City of Council Bluffs is an entitlement community and therefore is qualified to receive financial assistance from the U.S. Department of Housing and Urban Development (HUD) on an annual basis. Specifically, the City qualifies for Federal entitlement funding made available through the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Programs. The formula grant programs covered by this Action Plan include only the Community Development Block Grant (CDBG). The Home Investment Partnership (HOME) Program funding and activities are outlined in the City of Omaha Annual Action Plan.

The City's fiscal year for these programs is January 1st through December 31st, and funding may be utilized to implement a variety of housing and community development activities. These must either: (1) provide benefit to low and moderate-income persons; (2) reduce or eliminate slum and blight conditions; or (3) address an urgent need. The goals of the formula grant programs covered by the Action Plan are: 1) to strengthen partnerships among all levels of government and the private sector so as to enable them to "provide decent housing"; 2) to establish, maintain, and "provide a suitable living environment" and 3) to "expand economic opportunities" for low and moderate income residents.

The 2022 Annual Action Plan primarily presents a budget for proposed activities to be implemented during the course of the program year and to address needs identified as part of the overall five-year strategy. This FY22 Annual Action plan is for the period January 1, 2022 through December 31, 2022 and comprises the second annual increment of the Five-Year Strategy (January 1, 2019 through December 31, 2023).

#	Project Name
1	CD Administration
2	Rehab Administration
3	MICAH House Operations
4	Catholic Charities
5	Heartland Homes
6	Heartland Homes - Pott County Homeless Outreach
7	New Visions - Joshua House
8	Family Housing Advisory Services
9	CBCSD Pre-School Arch. & Engineering
10	New Visions – Bathroom Remodel
11	Habitat for Humanity - Lot Acquisition
12	712 Initiative – Lot Acquisition
13	Housing Rehab Program - Affected Properties
14	Lead Hazard Control Rehabilitation Program

#	Project Name
15	Infill Loan Underwriting
16	Franklin and Bennett
17	Arbor Creek

Table 7 – Project Information

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

To budget activities to be implemented each program year, the City invites funding applications each June prior to the upcoming program year beginning January 1. All applicants are required to apply according to a prescribed format, including City departments, for-profit and non-profit entities. Specific efforts to broaden public participation include publicizing the availability of application forms in the City’s local newspaper (the “Daily Nonpareil”), as well as posting them on the City’s web page, City Hall and the Council Bluffs Public Library.

Applications are reviewed by the City’s Community Development Advisory Committee (CDAC) and Community Development staff. The Community Development Advisory Committee serves as a forum for receiving public comments and providing information to the public on the preparation, implementation and evaluation on the City’s Community Development Programs, in particular the City’s CDBG and HOME Programs. The Committee is intended to provide broad-based community involvement and assures that those groups within the community which may be most directly affected by various community development programs are represented in its process. The Committee formulates recommendations to the City Council which proposed activities should be funded and at what amount. The City Council may either accept, reject, or modify the Committee’s recommendation(s) and directs that a draft Action Plan be prepared that is made available for at least a 30-day public review and comment period. A comprehensive schedule of the consolidated planning process, including public review/comment, hearing, and Council action dates is directly conveyed to all applicants.

This FY22 budget was approved by the City Council on October 11, 2021 with the public review and comment period of the draft Action Plan from December 1, 2021 to December 31, 2021. A public notice ran in the Daily Nonpareil newspaper on December 1, 2021 to outline the Statement of Objectives as supported by City of Council Bluffs’ Consolidated Plan, to summarize the proposed FY22 CDBG and HOME funded projects. The public comments received can be found in Section VIII, Citizen Participation Process and Public Comments Received.

Federal resources expected to be available to address the priority needs identified in this plan include CDBG. It is anticipated that in during the 2022 funding cycle that at a minimum 70% of the funds will be utilized for persons of low and moderate income. The projects are individually identified and described within this plan, along with other areas of concern that address issues such as: geographical distribution of funds; outcome performance measurement; leverage and match; homelessness; anti-poverty

strategy; continuum of care; fair housing; monitoring; and certifications.

AP-38 Project Summary
Project Summary Information

1	Project Name	CD Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$200,000
	Description	Salaries, benefits, and fees for administering CDBG
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	209 Pearl Street
	Planned Activities	
2	Project Name	Rehab Administration
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$75,000
	Description	Funds will be used to support administrative costs of the City's rehab program.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	209 Pearl Street
	Planned Activities	
3	Project Name	MICAH House Operations
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$37,000

	Description	Funds will be used to provide operating support to the local shelter.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimate 900 persons served.
	Location Description	1514 Ave J
	Planned Activities	
4	Project Name	Catholic Charities
	Target Area	
	Goals Supported	Supportive Services for the Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$12,000
	Description	Provide operating costs to the domestic violence shelter.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimate 200 persons served.
	Location Description	1215 N Broadway
	Planned Activities	
5	Project Name	Heartland Homes
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Supportive Services for the Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$12,000
	Description	Provide operating costs to the Heartland Homes permanent supportive shelter.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimate 85 persons served.

	Location Description	1515 Ave J
	Planned Activities	
6	Project Name	Heartland Homes - Pott County Homeless Outreach
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Supportive Services for the Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$15,000
	Description	Provide operating costs to the street outreach program.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimate 85 persons served.
	Location Description	City-wide
	Planned Activities	
7	Project Name	New Visions - Joshua House
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Supportive Services for the Homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$20,000
	Description	Provide operating costs to the men's homeless shelter.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 700 men served at the shelter
	Location Description	1435 N 15th St
	Planned Activities	Operating costs
	Project Name	Family Housing Advisory Services

8	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Housing Counseling
	Needs Addressed	Housing Counseling Services
	Funding	CDBG: \$30,000
	Description	Provide operating costs to housing counseling program.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 375 households will be assisted
	Location Description	500 Willow Ave, #408
	Planned Activities	Operating costs
9	Project Name	CBCSD Pre-School Arch & Engineering
	Target Area	
	Goals Supported	Public Facilities and Improvements
	Needs Addressed	Suitable living
	Funding	CDBG: \$70,000
	Description	Architecture & Engineering costs for the construction of an Early Learning Center
	Target Date	12/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 148 persons will be assisted
	Location Description	Corner of Ave G & N. 8 th Street
	Planned Activities	Architecture & Engineering costs for the construction of an Early Learning Center
10	Project Name	New Visions – Bathroom Remodel
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Supportive Services for the Homeless
	Needs Addressed	Homelessness

	Funding	CDBG: \$100,000
	Description	Remodel bathrooms inside homeless shelter
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 700 men served at the shelter
	Location Description	1435 N 15th St
	Planned Activities	Remodel bathrooms inside homeless shelter
11	Project Name	Habitat for Humanity - Lot Acquisition
	Target Area	
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$33,000
	Description	Acquire two lots for the construction of two new single-family homes to be sold to LMI families.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Two families
	Location Description	TBD
	Planned Activities	Acquisition
12	Project Name	712 Initiative – Lot Acquisition
	Target Area	
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$55,000
	Description	Lot acquisition for a rehab project
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	1-2 families
	Location Description	TBD

	Planned Activities	Lot acquisition for a rehab project
13	Project Name	Housing Rehab Program - Affected Properties
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$350,000
	Description	Rehab individual owner occupied households.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 20 households assisted
	Location Description	City-wide
	Planned Activities	General rehab focusing on exterior and major systems.
14	Project Name	Lead Hazard Control Rehabilitation Program
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$170,666 Lead Hazard Reduction Program: \$766,667
	Description	Continue remediating lead in LMI households for lead poisoning prevention.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Estimated 15 households
	Location Description	City-wide
	Planned Activities	
15	Project Name	Infill Loan Underwriting
	Target Area	

	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$70,000
	Description	Loan underwriting for down payment assistance on infill homes.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	30 families
	Location Description	City-wide
	Planned Activities	30 forgivable loans for down payment assistance
16	Project Name	Franklin and Bennett
	Target Area	
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$100,000 General Fund: \$100,000
	Description	Construction of new single-family houses with 51% being sold to LMI households.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 14 homes
	Location Description	Franklin Avenue and Bennett Avenue
	Planned Activities	A mix of affordable and market rate single-family units with a total of 30 homes being constructed
17	Project Name	Arbor Creek
	Target Area	
	Goals Supported	Housing Development
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$384,000

Description	Construction of new 12 attached single-family units sold to LMI households
Target Date	12/31/2022
Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 homes
Location Description	West of Harry Langdon Blvd, South of 18 th Ave, east of South Expressway, north of I-80
Planned Activities	A mix of affordable and market rate single-family units with a total of 26 homes being constructed

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Geographically, the Neighborhood Revitalization Strategy Area (NRSA), the City's central portion, has the greatest housing and service problems. The NRSA is a contiguous area of about four square miles located in the central portion of Council Bluffs and contains the city's Central Business District, the Broadway Commercial Corridor, railroad related industrial uses and a variety of single family residential neighborhoods. A map of the NRSA is on the following page. Based on the 2010 Census figures, 9,763 persons, or 65.2% of the NRSA, are classified as low or moderate income, compared to a city-wide percentage of 55.1%. Residents of the NRSA have the greatest need for assistance and activities in this area are given priority. Some programs are designated only for use within the NRSA.

Geographic Distribution

Target Area	Percentage of Funds
NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	35
Mid-City Railroad Corridor Urban Renewal Area	0

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

It is anticipated that during the 2022 funding cycle that at least 35% of the CDBG funds will be utilized for persons and/or projects within the NRSA. Most of the housing in Council Bluffs that needs rehabilitation is located in the target area. In addition, the NRSA has experienced limited new housing construction. The activities targeted to this area include construction of new single-family, single-family rehabilitation and repair, blight removal, homeownership assistance, rental housing development, counseling services and homeless initiatives. However, investments in housing will occur throughout all predominantly low and moderate income areas.

Discussion

In the areas selected for investment the City hopes to achieve: 1) the conservation of existing neighborhoods and the preservation and expansion of existing housing stock; 2) dramatically visible, concentrated improvement of strategic parts of neighborhoods with greatest economic and housing needs; 3) the expansion of rehabilitation and new construction activity into low income neighborhoods; 4) housing infill development which will make vacant property productive again and 5) creation and retention of jobs for low and moderate income persons.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Public policies such as land use controls, zoning ordinances, housing and building codes, permits, fees, and tax policies affect housing affordability. In addition, these public policies can become barriers to affordable housing.

The identified public policy barriers to affordable housing in Council Bluffs include:

- 1) Real estate tax rate of 4.5% on multi-family structures of 4+ units is a deterrent to building new rental housing units.
- 2) State and federal funding resources have continuously declined over the past decade with fewer resources made available to finance affordable housing projects.
- 3) Access to programs to build and rehabilitate housing continue to decline requiring a greater reliance on CDBG and HOME funds.

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 Council Bluffs' Comprehensive Plan guides future investment in housing and development of land within the City's jurisdiction and in surrounding suburban areas. The Comprehensive Plan has established a policy that guides growth and encourages redevelopment of deteriorating central city areas. The City will use its regulatory authority in combination with development incentives to insure that the basic development pattern set out by the Comprehensive Plan is implemented in all areas of the city.

The City of Council Bluffs will work with County, State, Federal and other local authorities to encourage a regulatory climate that minimizes negative impact on housing affordability while, at the same time, maintaining needed health, safety, environmental, and Comprehensive Plan

protections.

The City, through the Comprehensive Plan and work with County, State, Federal and other local authorities, will ensure public policies such as land use controls, zoning ordinances, housing and building codes, permits, fees, and tax policies have minimal negative impacts on housing affordability in Council Bluffs

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section describes the actions the City plans to take in the near future for the following strategies: 1) obstacles to meeting underserved needs, 2) foster and maintain affordable housing, 3) evaluate and reduce lead-based paint hazards, 4) develop then institutional structure, and 5) enhance coordination.

Actions planned to address obstacles to meeting underserved needs

Programs administered by the City of Council Bluffs will assist households with incomes below the poverty line most effectively by providing affordable housing opportunities that are coordinated with support services for individuals and families and with community and economic development efforts in predominantly low income areas.

Actions planned to address obstacles to meeting underserved needs include the following:

- The City will work with other funding agencies, including Iowa West Foundation, the Council Bluffs Housing Trust Fund and other foundations, to coordinate funding to more effectively meet the needs of the community.
- The City will seek opportunities to increase funding available for affordable housing.
- The City will work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.
- Continue to finance homeownership counseling and financial management education provided to lower income households, particularly minorities.
- Continue to fund homeownership counseling and financial management education for lower income households, particularly minority households.

Actions planned to foster and maintain affordable housing

The Action Plan shows that during FY2022 newly constructed multi-family housing will be made available for low- income occupancy through a variety of City-sponsored housing programs. Existing homeowners will receive financial assistance for rehabilitation projects. Other homeowners will receive

emergency repairs through grants.

- Increase the supply of decent housing that is affordable to households below 80% of AMI and accessible to persons with disabilities.
- Increase accessibility to appropriate mortgage products for lower income minority households, particularly Black households.
- Expand the City's supply of decent housing affordable to households below 80% AMI in neighborhoods across Council Bluffs.
- Work with non-profit housing providers when the time comes to renew tax credits to ensure continued viability of the housing.
- Continue efforts to identify and provide adequate property, which is properly zoned and served with utilities, for multi-family housing construction.
- Implement recommendations outlined in the City's Analysis of Impediments to Fair Housing Choice.

Actions planned to reduce lead-based paint hazards

- The city was awarded \$2.3 million from the Lead Hazard Reduction Program through HUD in December 2018. These funds will be used to assess 110 units and remediate lead in 100 units in Council Bluffs to create a lead-safe housing list that will be available to the public.
- All housing rehabilitation efforts on homes that were built before 1978 will include lead-based paint hazard evaluations. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.
- The City will continue to provide educational information about the hazards of lead-based paint. Information is available at the City's Community Development and Health Departments.
- To date, 11 homes have been completed.

Actions planned to reduce the number of poverty-level families

- The City will support the efforts of non-profit and public agencies that are working to reduce the number of poverty-level families.

Actions planned to develop institutional structure

- Eliminate language barriers for persons with LEP to enhance their accessibility to City programs and services by providing language services as needed, if a Language Access Plan is not warranted.
- Solicit applications and increase the percentage of members of the protected classes serving on appointed boards and commissions dealing with housing issues until comparable to City-wide

rates.

- Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents, and Realtors.
- The City will continue to support the efforts of the Metro Area Continuum of Care for the Homeless, the Municipal Housing Agency of Council Bluffs and the Council Bluffs Housing Trust Fund. All of these agencies collaborate with housing and social service agencies to address housing needs in Council Bluffs and the metro area.

Discussion

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

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

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

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

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.	70.00%

Discussion

Attachments

Citizen Participation Comments

Citizen Participation