

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan was developed using data collected for the Needs Analysis and Market Analysis. Along with public input the priorities were created to address issues pertaining to Housing, Homelessness, Public Facilities, and Economic Development.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The City of Duluth does not have any HUD approved revitalization areas, however the City does focus its funding on 5 low income neighborhoods: Lincoln Park, Morgan Park, West Duluth, East Hillside and Central Hillside.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Non-Homeless Need
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Affordable Housing Homelessness Staff Administration
	Description	Housing for people who are not currently experiencing homelessness but need housing with supportive services. Typically people may have disabilities (mental, physical, development), are experiencing alcohol and/or drug addiction, or may be elderly.
	Basis for Relative Priority	One of the main reasons people continue to experience homelessness is due to illness, disability, and/or addiction. With Duluth's very low vacancy rate, people who have these needs have the most difficult time finding housing.
2	Priority Need Name	Community Development Public Facilities

	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children Elderly Persons with Physical Disabilities
	Geographic Areas Affected	
	Associated Goals	Infrastructure Improvements Neighborhood Revitalization Transportation Access Staff Administration
	Description	Assist neighborhoods facilities that provide vital services with accessibility improvements or community services. These facilities include Homeless Facilities, Neighborhood Facilities, and Transportation related facilities.
	Basis for Relative Priority	Improving public facilities was identified as a important need in the community during the Consolidated Plan Need Assessment and during the Imagine Duluth 2035 public input sessions.
3	Priority Need Name	Affordable Housing
	Priority Level	High

<p>Population</p>	<p>Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence</p>
<p>Geographic Areas Affected</p>	
<p>Associated Goals</p>	<p>Affordable Housing Neighborhood Revitalization Homelessness Public Services Staff Administration</p>
<p>Description</p>	<p>Increase the number and condition of affordable housing units for LMI people. Project locations should be available throughout the community with convenient access to jobs, amenities, and services. Housing should serve people in need of support services, accessible units, individual units, and those that are seniors. Housing should utilize energy efficient practices. All housing efforts should support the policies and strategies of the Imagine Duluth 2035 Comprehensive Plan.</p>

	Basis for Relative Priority	Duluth has had a consistent vacancy rate of 3% for the past several years; the vacancy rate of housing units that could serve LMI has been lower than 3%, showing a substantial need in the community. In addition, the need for housing in the homeless population has also been increasing. Although homeowners in general may be less cost burden than renters, a higher percentage of low to moderate income owners are paying over half their income towards housing, as well as experiencing housing problems. Housing problems include plumbing disrepair, unvented or unreliable heating source, and lack of basic kitchen facilities, leaks, pest infestations, missing or unsafe electrical systems or other health safety violations. Many elderly homeowners are having difficulty maintaining their housing but do not have a safe alternative.
4	Priority Need Name	Neighborhood Improvement and Safety
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Neighborhood Revitalization Staff Administration
	Description	Improve LMI neighborhoods by addressing vacant, condemned, and deteriorated properties. Provide neighborhood infrastructure/amenities that improve safety and livability. Improve buildings that provide essential services and basic needs to LMI people. Revitalization efforts should include strategies to prevent displacement of LMI people.

	Basis for Relative Priority	Neighborhood improvement and safety has been a key priority for neighborhood groups. In addition, there are number of structures (mostly residential) that were built prior to 1940 that have not been maintained and have been determined by housing rehab specialists to be more expensive to repair than to demolish. The majority of these blighted structures are in LMI neighborhoods, which in impacts the living conditions and home values. By removing these structures, these neighborhoods could improve in value and safety.
5	Priority Need Name	Economic Development
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	
	Associated Goals	Increase Incomes Create Living Wage Jobs Staff Administration
	Description	Create jobs by providing assistance/incentives to businesses to grow and hire LMI people. Provide job training and/or education to people to enable them to earn a living wage.
	Basis for Relative Priority	Creating Living Wage jobs was identified as a high priority need in the Community Needs Assessment.
6	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Public Services Health Services Food Access Childcare Access Staff Administration
	Description	Provide services to LMI people that fulfill basic needs, prevent evictions, and address other needs. This priority need includes assisting people with childcare, health services and improving food access.
	Basis for Relative Priority	The programs to be supported fulfill basic needs (food and shelter) for people who are low-income and/or homeless; provide health care to LMI people; help abused and neglected youth and others who are homeless or at risk of becoming homeless, and provide tenant/landlord mediation services to prevent evictions; improve access to food, and provide child care services.
7	Priority Need Name	Homelessness

	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Homelessness Public Services Staff Administration
	Description	Provide shelter, services, and rental assistance to people who are homeless or at risk of becoming homeless. This includes supporting coordinated entry; housing stabilization initiatives; operating emergency shelters that help families and individuals who are experiencing homelessness rapidly become housed; providing shelter and stabilization services for people experiencing domestic abuse and/or sex trafficking; and creating additional permanent supportive housing units for chronically homeless.
	Basis for Relative Priority	Based on recent homeless studies, there is an estimated population of 800 people who are experiencing homelessness in Duluth. Studies have shown that many of these individuals and families could maintain housing is they are provided an appropriate level of supportive services in subsidized housing units. As the "housing first" model becomes the focus of the Continuum of Care efforts to address long-term homelessness. There is an increased need for permanent, supportive housing units. There is also a need to reduce the number of days people experience in a shelter.
8	Priority Need Name	Public Housing
	Priority Level	High

Population	Extremely Low Low Large Families Families with Children Elderly Public Housing Residents Persons with Physical Disabilities
Geographic Areas Affected	
Associated Goals	Affordable Housing Staff Administration
Description	The number of housing units available to people with vouchers is very limited in Duluth. The City is working with the Housing and Redevelopment Authority to increase the number of units available for people who have vouchers. The City is also working to increase the number of accessible units available to LMI households.
Basis for Relative Priority	The vacancy rate for public housing units has been less than 3% for the past several years, this need has been identified by the community as a priority.

Narrative (Optional)

Analysis of Impediments to Fair Housing Choice – City of Duluth In conjunction with each five-year Consolidated Plan, we develop an Analysis of Impediments to Fair Housing Choice (AI). The AI lays out the City’s planned actions to affirmatively further fair housing for the next five years. We look at the following federally defined protected classes when we analyze fair housing issues: race, color, religion, sexual orientation, gender identity, disability, family status, and national origin. Anything that limits housing availability or choice on the basis of these protected classes is an impediment to fair housing choice. This plan is attached to the Consolidated Plan and is available on the City’s website. Consolidated Plan Goal and Action Plan Goals support the Fair Housing Choice Plan.

Impediment 1: Exclusionary rental housing practices and policies directed at Section 8 Housing Choice Voucher holder

Consolidated Plan Goal Support: Affordable Housing, Public Services

2020 Action Plan Project Support: Decker Dwelling, Duluth Property Rehab, Tenant Landlord Connection

Impediment 2: Exclusionary rental housing practices and policies directed at persons with criminal histories

Consolidated Plan Goal Support: Affordable Housing, Public Services

2020 Action Plan Project Support: Tenant Landlord Connection, Tenant Landlord Incentive Program

Impediment 3: Involuntary displacement and limited housing choice caused by gentrification.

Consolidated Plan Goal Support: Affordable Housing, Public Services, Transportation

2020 Action Plan Project Support: Duluth Property Rehabilitation, SIA Blight Reduction and Coordination

Impediment 4: Policies and physical limitations in the built environment

Consolidated Plan Goal Support: Affordable Housing, Public Services

2020 Action Plan Project Support: Duluth Property Rehabilitation, SIA Blight Reduction and Coordination, Tenant Landlord Connection, Duluth Lending Rehabilitation, Superior View Roof Repair

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>The HRA provides rental assistance to approximately 22 households who would otherwise be homeless. These people are assisted until they can transition onto Section 8 Housing Choice Voucher. This program is part of the continuum of services to prevent homelessness by bridging the gap. These vouchers secure safe, decent and affordable housing for individuals who normally would not have the financial means do so it themselves. Market conditions that lead to the use of HOME funds for tenant-based rental assistance are rents that are unaffordable for extremely-low income households, and a vacancy rate of 3.4% in rental properties.</p>
TBRA for Non-Homeless Special Needs	Not applicable.
New Unit Production	<p>Most of Duluth’s housing stock requires significant upgrades. As Duluth grows economically, attracting jobs in airplane manufacturing and engineering, population is projected to grow. A study conducted by Maxfield Research Inc. found that the current housing stock cannot accommodate the growth in population. Issues that were highlighted by the study were the lack of larger and upscale rental units, the underutilization of financing tools to expand housing supply, and the age and maintenance requirements of the existing housing stock. Most of the houses were built before the 1950’s and required many substantial upgrades. Upgrades include weatherization, lead paint mitigation, installation of modern appliances, and general maintenance requirements. While most of the homes were affordable even with the upgrades, they could not secure a loan from the bank. The value of the upgrades would not have been reflected in the houses market value thus creating a value gap at which a commercial bank would not support.</p> <p>With the need for new housing units the City of Duluth believes that an all of the above approach to new housing is necessary. There needs to be an increase in supply of all types of housing units including rental, owner occupied, affordable, and market rate.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	The City of Duluth has an aging housing stock. 54% and of owner occupied and 48% of rental units were built before 1950. Furthermore, units built before 1980 make up 85% of owner occupied and 80% of rental units. This means over 80% of housing units in Duluth are at least 35 years old. Most housing units in Duluth require or will require significant upgrades in the near future. With tight rental and homeowner markets there has been little incentive for property owners to upgrade their units. Code enforcement by the City of Duluth’s Life Safety Division has been lacking. This was an impediment identified in the City’s Analysis of Impediments to Fair Housing Choice.
Acquisition, including preservation	

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Duluth expects to receive nearly \$3,000,000 in funds from the Department of Housing and Urban Development (including CDBG, HOME, and ESG). The city has prioritized projects and activities in this plan and will work to disperse the funds to meet the goals and objectives identified.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,426,497	0	0	2,426,497	9,500,816	All prior resources have been committed. \$113,674 in program income and additional program income that accrues will be utilized on housing rehabilitation projects.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	549,739	0	0	549,739	2,164,424	HOME Funds do not receive program income and are not part of a RLF. All prior resources have been committed in IDIS.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	208,704	0	0	208,704	802,576	ESG Funds do not receive PI. All prior resources have been committed in IDIS.

Table 50 - Anticipated Resources

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

CDBG, HOME, and ESG funds will help to leverage over \$20,000,000 annually (\$100,000,000 over the 5-year plan) of other federal, state, and local funds. Matching requirements have been regularly met and the city doesn't anticipate having difficulty in satisfying these requirements. The City of Duluth reports on the match and leverage expenses in the CAPER reports. During the application process, the agencies provide the City with match information. ESG projects exceed the 1:1 match requirement, due the funding being used by established agencies that have other funding sources. HOME projects are match with either Tax Credit funding and/or Minnesota Housing Fund and/or Greater Minnesota Fund and by local organizations. Typically HOME funds represent 10 to 30% of a project development cost. All new development and acquisition/rehab projects that use HOME funding are required to have an individualize development agreement that shows the scope of work and funding sources. The City will track match HOME and ESG throughout the year and continue to ensure 25% and 100% requirements are met.

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

Although not already identified, publically owned land is always considered as a way to reduce costs for new housing developments. The city of Duluth regularly considers using tax forfeited properites that Saint Louis County manages. These lands range from homes that are in need of rehab, to severly damaged/condemned buildings, to open lots. Often the city attempts to work with the county to remove the blighted structures and redevelop the land.

Discussion

The City continues to work with area funders, federal, state, and local funders to be able to leverage the federal funds that are received. While local private Foundations experienced a period of reduced funding availability, projections show those amounts to increase. Individual organizations and collaborations have improved at seeking out new and alternative funding sources, in order to maintain service levels within the city. The city also continues to encourage cost-saving-collaborations within the housing, public service, and economic development areas.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
DULUTH	Government	Planning neighborhood improvements public facilities	Other
HOUSING AND REDEVELOPMENT AUTHORITY OF DULUTH	PHA	Homelessness Ownership Public Housing Rental	Other

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

To implement the Consolidated Plan, the City’s Planning and Development Division has strong community partnerships with various local non-profits, private industry partners, and other public institutions working within the jurisdiction. City of Duluth staff attend meetings such as the Affordable Housing Coalition and Continuum of Care, among others, to foster strong continued partnerships to carry out Consolidated Plan goals.

Local non-profit organizations provide specialized services and programming to local communities. Non-profit organizations collaborate with the city of Duluth by being sub-recipients to community development funds. A strength in this relationship is the many long-term partnerships that have been formed with local organizations and the firsthand knowledge that they pass on to us in our planning efforts. Potential gaps include streamlining coordination with newly awarded/interested non-profits to receive funding.

The city of Duluth is open to collaborate with private sector industries in addition to non-profits to better advantage funds and address community and economic development needs.

Finally, the city of Duluth collaborates with public entities such as St. Louis County and the Duluth Housing and Redevelopment Authority (HRA). The HRA board is appointed by the Mayor and confirmed by City Council . A number of housing and support services are provided by the HRA that assist with community development program needs including administration, case management, and maintaining public housing assets. St. Louis County administers and manages homeless and other general public services for Duluth residents and is the local CoC. St. Louis County has recently adopted a 5 year plan to address homelessness which will be carried out in partnership with the city of Duluth.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			
Food Services	X	X	

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The city of Duluth supports a wide array of services for special needs populations and persons experiencing homelessness through its community development funding which is allocated to nonprofits and other agencies to most efficiently carry out program goals. For example, the City

supports the Duluth at Work program, which targets extremely low-income individuals who often face barriers to employment. Through our funding, we also support the Duluth Hunger Project, which is a program in coordination of three local groups (CHUM, Damiano Center, and Salvation Army) to provide hot meals and food packages to low income or homeless households. As a final example, the city of Duluth also helps fund Accessible Space, Inc., which provides affordable housing for very low-income individuals with disabilities. As with many services and delivery, gaps can spring from lack of sufficient dollar amounts to provide for long-term program funding

Beyond community development funding but also part of the service delivery system, the City of Duluth works with other government agencies such as St. Louis County, Minnesota Finance housing Agency, and the Greater Minnesota Housing Fund to address community needs. Funding allocation is also a concern in addressing future gaps of service and delivery as well as coordination between statewide, County, and local efforts.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

A key strategy to address the priority needs in the community and having more intergovernment and agency partnership. Partnerships have been successful in obtaining funding to build more supportive units in Duluth, which addresses many of the priorities. A key component of these partnerships has been the collaboration between the City, St. Louis County Government, the COC, and non-profit organizations.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Infrastructure Improvements	2020	2025	Non-Homeless Special Needs Non-Housing Community Development		Community Development Public Facilities	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
2	Transportation Access	2020	2025	Non-Homeless Special Needs Non-Housing Community Development		Community Development Public Facilities	CDBG: \$50,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
3	Affordable Housing	2020	2025	Affordable Housing		Non-Homeless Need Affordable Housing Public Housing	CDBG: \$5,803,990 HOME: \$2,000,000	Rental units constructed: 250 Household Housing Unit Rental units rehabilitated: 500 Household Housing Unit Homeowner Housing Added: 50 Household Housing Unit Homeowner Housing Rehabilitated: 500 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Neighborhood Revitalization	2020	2025	Non-Housing Community Development		Community Development Public Facilities Neighborhood Improvement and Safety Affordable Housing	CDBG: \$300,000	Buildings Demolished: 5 Buildings
5	Increase Incomes	2020	2025	Non-Housing Community Development		Economic Development	CDBG: \$1,300,000	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
6	Public Services	2020	2025	Homeless Non-Housing Community Development		Homelessness Public Services Affordable Housing	CDBG: \$325,000	Public service activities other than Low/Moderate Income Housing Benefit: 17500 Persons Assisted
7	Create Living Wage Jobs	2020	2025	Non-Housing Community Development		Economic Development	CDBG: \$375,000	Businesses assisted: 70 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Homelessness	2020	2025	Homeless		Non-Homeless Need Homelessness Affordable Housing	CDBG: \$572,000 HOME: \$473,830 ESG: \$965,260	Public service activities for Low/Moderate Income Housing Benefit: 15000 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 270 Households Assisted Homeless Person Overnight Shelter: 8150 Persons Assisted
10	Health Services	2020	2025	Non-Housing Community Development		Public Services	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
11	Food Access	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 3300 Persons Assisted
12	Childcare Access	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
13	Staff Administration	2020	2025	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Community Development Public Facilities Non-Homeless Need Economic Development Neighborhood Improvement and Safety Homelessness Public Services Affordable Housing Public Housing	CDBG: \$2,500,000 HOME: \$240,000 ESG: \$78,000	Other: 1 Other

Table 53 – Goals Summary

Goal Descriptions

1	Goal Name	Infrastructure Improvements
	Goal Description	
2	Goal Name	Transportation Access
	Goal Description	Provide opportunities that ensure LMI people have access to all modes of transportation to access employment, services, health care, food, recreation, and other basic needs

3	Goal Name	Affordable Housing
	Goal Description	Increase the number and condition of affordable housing units for LMI people. Project locations should be available throughout the community with convenient access to jobs, amenities, and services. Housing should serve people in need of support services, accessible units, individual units, and those that are seniors. Housing should utilize energy efficient practices. All housing efforts should support the policies and strategies of the Imagine Duluth 2035 Comprehensive Plan.
4	Goal Name	Neighborhood Revitalization
	Goal Description	Improve LMI neighborhoods by addressing vacant, condemned, and deteriorated properties. Provide neighborhood infrastructure/amenities that improve safety and livability. Improve buildings that provide essential services and basic needs to LMI people. Revitalization efforts should include strategies to prevent displacement of LMI people.
5	Goal Name	Increase Incomes
	Goal Description	Provide job training and skill development to assist people who are LMI in accessing living wage jobs. Job training should include collaboration with the CareerForce Center and ensure a focus on needed job sectors. Assist LMI people to grow/start their business and grow their income. All efforts should support the city's Workforce Development Strategic Plan.
6	Goal Name	Public Services
	Goal Description	Provide services to LMI people that fulfill basic needs, prevent evictions, and address other needs.
7	Goal Name	Create Living Wage Jobs
	Goal Description	Create jobs by providing assistance/incentives to businesses to grow and hire LMI people.
9	Goal Name	Homelessness
	Goal Description	Provide shelter, services, and rental assistance to people who are homeless or at risk of becoming homeless utilizing CDBG and HOME funds. The City's HESG funds will provide assistance to approximately 2000 people per year, those numbers will be counted in HMIS, and in a separate report in the CAPER.

10	Goal Name	Health Services
	Goal Description	Provide health, dental, and mental health services to people who are LMI.
11	Goal Name	Food Access
	Goal Description	Provide easy access to healthy and affordable food to people who are LMI.
12	Goal Name	Childcare Access
	Goal Description	Ensure childcare is available in LMI neighborhoods and for LMI people that is safe, affordable, and convenient.
13	Goal Name	Staff Administration
	Goal Description	Administration funding for the CDBG, HOME, and ESG programs

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

As defined by the HOME regulations it is estimated that to 50 to 100 extremely low-income families will be assted, 50 to 150 low-income families, and 75 to 100 moderate families will be assisted, depending on the grant amounts.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Since completing the section 504 Needs Assessment, the HRA has put policies in place to address accessibility needs and compliance under 24 CFR 8.25. The HRA currently has a sufficient number of accessible units

Activities to Increase Resident Involvements

The HRA has continued to send out newsletters and help facilitate tenant meetings. The HRA also continues to have a resident who sits as commissioner on the HRA board. There is a resident advisory board for all public housing and resident clubs at each of the six high rises in Duluth.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

NA

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

- Cost of construction, including materials and labor
- Shortage of qualified builders which causes difficulty in receiving competitive bids
- Lack of available land, most of the buildable land has been developed.
- Lack of annual budgeted funding to demolish or repair buildings condemned for demolition or human habitation, allowing blight to persist in LMI neighborhoods.
- Limited Minnesota Housing funding for rehab of aging single-family structures occupied by LMI households, which leads to higher maintenance costs.
- Lack of a policy to require improvements to foreclosed properties in LMI neighborhoods that are on the vacant property register.
- Minnesota State Historic Preservation Office policies that create additional rehab costs, such as wooden windows and doors repaired rather than replaced by new historically designed materials.
- Outdated historic property references that trigger SHPO review of affordable housing rehab projects on buildings not eligible for listing, which increases costs and delays.
- No education requirement for owners and/or managers to secure a rental license.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

- Support selected demolition of blighted properties in LMI neighborhoods. If funded by Community Development, requirement will be to leave a “clean” site for redevelopment.
 - Community Development supported rehab projects will address all needed repairs and updates, including housing code, energy efficiency, and healthy home deficiencies.
 - Implement acquisition/rehab/resale activities to address vacant foreclosed properties in LMI neighborhoods.
 - Review annual Housing Report sales data to determine if a local study of median sales price would increase after-rehab value limit.

- Require rehab programs receiving Community Development funding to increase energy efficiency in existing homes by 20%, and require funded new construction to meet Energy Star standards.

- Provide funding for tenant-based rental assistance to help the “hard-to-house” and homeless population to secure adequate housing.

- Modify policies to eliminate the “re-instatement” of special assessments on tax forfeit lots that have the potential for redevelopment, when appropriate.

- Work with St. Louis County and the Minnesota Department of Revenue to revise polices to encourage redevelopment of tax forfeit land.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Duluth has a strong homeless response system and is working closely with St. Louis County and homelessness service provider agencies to strengthen system access and service delivery through implementation of the goals and outcomes outlined in the HEARTH Act and under the Emergency Solutions Grant and Continuum of Care regulations. Components of the Homeless Response System in Duluth include:

Outreach

Described in section MA-19, outreach activities in Duluth are coordinated through a strong network of homeless shelter and service provider agencies (CHUM, Life House, LSS and HDC) in partnership with the Duluth Police and St. Louis County Health and Human Services. Street outreach activities are conducted daily and most evenings and extend beyond the city limits of Duluth. CHUM and MACV also conduct outreach in the hospitals and jails/prisons.

In addition to the day-to-day outreach, Duluth also conducts an annual Project Homeless Connect Event for homeless persons and MACV organizes an annual Stand Down event for homeless veterans. Continuum of Care homeless housing and service provider partner agencies also conduct an annual Homeless Summit annually.

Addressing the emergency and transitional housing needs of homeless persons

Emergency Shelter

The shelter system in Duluth is comprised of three emergency shelters. The CHUM Shelter serves singles through their congregate facility and families at their off-site facilities. Many of the persons that access services at CHUM are identified as ‘high barriered’ and the ‘hardest to house’. In addition to the 44 congregate beds, CHUM provide overflow mats if the beds are full. In some circumstances, CHUM works with their Churches United in Ministry partners to provide families with shelter at a nearby church when their family units are full.

Safe Haven Shelter and the American Indian Community Housing Organization both provide shelter and services to single women and women with children who are fleeing domestic violence. Safety is their

first priority for the women (and children) who enter their shelters. Participants have access to a wide range of supportive services, including food, clothing, transportation and legal assistance, access to mental health assistance, case management and children's advocacy. In addition, AICHO provides culturally specific programming for Native American women (and their children).

Union Gospel Mission

Union Gospel Mission is primarily a soup kitchen where people can access hot meals each day. The 11 SRO units above the soup kitchen facility are targeted for chronic homeless single men.

Transitional Housing

Five agencies in Duluth provide transitional housing and supportive services to homeless persons. They are the American Indian Community Housing Organization who provides transitional housing and culturally focused support services for primarily (but not limited to) Native American Women and Women-headed families, Center City Housing who provides transitional housing and supportive services to single women and families, the Salvation Army who provides transitional housing and supportive services to one and two-parent families and Life House and Lutheran Social Services, both provide transitional housing and supportive services to homeless youth (ages 16-23). Minnesota Assistance Council for Veterans provides transitional housing and services to homeless veterans. Approximately, 1,800 homeless persons are assisted through the Duluth shelter system annually.

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

Duluth has slowly been building its supply of Permanent Supportive Housing (PSH) to serve persons with disabilities and the chronically homeless. Center City Housing Organization operates the San Marco and Memorial Park apartment facilities that house single men and women, Alicia's Place for single women, and Sheila's Place that serves families. Center City and CHUM operate the Steve O'Neil apartment building which provides 44 units to families that have experienced homelessness. The American Indian Community Housing Organization operates the Gimaajii apartments for families, primarily for (but not

limited to) Native Americans. Minnesota Assistance Council for Veterans operates the Duluth Vets Place for single veterans.

The Housing Authority of Duluth provides Shelter + Care vouchers. Almost half – 42% (46/108) of the PSH units in Duluth are targeted for chronically homeless persons (does not include units under development).

Rapid Re-housing

CHUM Shelter, Safe Haven Shelter, AICHO, Salvation Army and Life House all participate in Rapid Re-housing programming. Funding for rapid re-housing activities is provided through the Emergency Solutions Grant (ESG) Program, the Continuum of Care Program and through the state's Family Homeless Prevention and Assistance Program (FHPAP). Prioritization protocols were established for targeting families and households that are the most appropriate for this type of assistance. These are the agencies that will be the entry points for Coordinated Access and Assessment in Duluth and once that system is fully functioning, rapid re-housing activities will be coordinated through the CAA system. Rapid Re-housing assistance includes short and medium-term rental assistance, rental arrears, deposit, utility payments and utility arrears, and application fees, moving assistance, case management and connection to mainstream resources.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Salvation Army, Life House, AICHO and Legal Aid Services of Northeast Minnesota provide prevention assistance in the City of Duluth. Funding for prevention assistance is provided through the ESG and FHPAP programs. Legal Aid activities are limited to mediation and legal issues, whereas the others also provide rental assistance, rental arrears, utility payments and utility arrears, moving assistance, case management and connection to mainstream resources.

In 2008, a Discharge Plan that was approved and adopted, outlines the protocols and transition process steps for discharging from institutions. A standardized assessment tool was developed and is being used by discharging entities in Duluth and throughout St. Louis County upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. Participating stakeholders in the City of Duluth include Essentia Health System, St. Luke's Hospital, the Center for Drug and Alcohol Treatment St. Louis County Corrections, St. Louis Health and

Human Service and the primary shelter in Duluth, CHUM Shelter. Chum staff are the main contacts in Duluth; they keep in contact with the other entities and are notified when someone is going to be discharged who is choosing to be discharged to CHUM. CHUM staff will work with the individual to locate housing prior to discharge. SOAR Career Solutions, through their Community Offender Re-Entry Program, offers specialized assistance to men exiting prison who were incarcerated for sex crimes. Program staff assist ex-offenders in their transition from incarceration to the community through support, employment services, mentoring, housing search and assistance and extended case management.

Continuum of Care Objectives

Continuum of Care Objectives

The St. Louis County SLC Continuum of Care Plan has five primary objectives; they are:

1. Increase progress towards ending chronic homelessness
 - Allocating funds for additional chronic beds
 - Set a goal to prioritize 95% of the PSH beds not dedicated for use by chronically homeless, but available through annual turnover, for use by the chronically homeless.
2. Increase housing stability
 - Support Coordinated Entry and Assessment Process
 - Best practices for case management and assessment
 - Agencies adopt and implement Housing First model
3. Increased income for program participants
 - Adopt best practices for increasing non-employment income
 - Make sure eligible participants are connected to Supplemental Security Income/ Social Security Disability Benefits
4. Increase the number of people accessing mainstream benefits
 - Agencies will participate in training sessions on Mainstream Benefits
 - Enrollment and outreach activities are being implemented to connect eligible households to appropriate Affordable Care Act options.
5. Expand Rapid Re-housing assistance as a method to reduce family homelessness
 - Allocate additional resources for Rapid Re-housing

- Maximize existing Rapid Rehousing resources using 'least touch' model
- Align CoC rapid re-housing assistance with Emergency Solutions Grant, Supportive Services for Veteran Families, and Family Homeless Prevention Assistance Program

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

All units that received CDBG and/or HOME funding are required to be in compliance with Lead regulations.

How are the actions listed above related to the extent of lead poisoning and hazards?

The risks related to lead poisoning and hazards are being reduced.

How are the actions listed above integrated into housing policies and procedures?

City of Duluth policy requires all rental and homeowner rehabilitation programs and projects receiving federally funded assistance to coordinate with the Duluth HRA for lead assessment, testing and clearance services. Given the age of Duluth's housing stock that predicts 68% contains lead-based paint, the concentration of low- and moderate-income households in less expensive older units, and the past experience of agencies implementing rehab programs, it is highly probable that all, or nearly all, rehabbed units will contain potential lead hazards. The Duluth HRA maintains a Lead Safe Housing registry of past units that have been made lead safe. To increase access to this registry by the general public, the HRA has made their database available on the HRA website.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Jurisdiction goals, programs, and policies for reducing the number of Poverty-Level Families

The City of Duluth aims to reduce the number of families and individuals currently living in poverty by looking beyond the effects (not being able to afford basic necessities like food, housing, healthcare, etc.) to address the root causes of poverty. The Planning and Development Division plans to move forward with the strategies listed below with consideration to the previous anti-poverty strategies and by synthesizing community with overarching consolidated plan goals.

Policy #1: Provide occupational training programs coupled with career development and job placement in partnership with the City’s Career Force and other job training programs such as Duluth at Work.

Policy #2: Assist households with removing barriers to obtaining employment through solutions that increase access and amount of affordable child care programs and through programs that address barriers such as criminal history when obtaining employment

Policy #3: Focus on efforts to reduce costs on household budget’s through energy efficiency programs that lower utilities and/or programs that assist with building assets of families through planned savings programs or assistance with homeownership opportunities.

Policy #4: Increase the amount and improve condition of affordable housing units, with a focus on rental units, that have long-term affordability restrictions (greater than 30 years), to maintain housing for low-to-moderate-income residents within our community.

Policy #5: Increase access to affordable and healthy food options as well as educational programs that contribute to healthy living in order to address the long-term health and economic impacts on households experiencing poverty

Poverty is often more than a simple calculation of a person’s household income. Some of the most common root causes of poverty that the City will address using these policies are as follows:

- Little or no education
- Insufficient employment skills, including soft skills
- Housing priced beyond a family’s means
- Housing unattainable due to criminal history
- Lack of adequate nutrition and health care
- Mental health or substance abuse issues that impact employment opportunities

These policies and goals will be addressed through programming that is carried out by public, private, and non-profit city partners.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Policy #4 of the Anti-poverty strategies aligns directly with the City's affordable housing plan. Increasing the amount and improving conditions of affordable housing units throughout the city is incredibly important for a healthy community.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The Planning and Development Division and City Auditor's Office conduct an annual risk assessment. This risk assessment of the subrecipients is based upon material weaknesses cited in the audit and performance in submitting appropriate documentation of expenditures, demographic information and other contract requirements and is completed on an annual basis. A high-risk subrecipient has material weaknesses and/or significant deficiencies in their audit relating to the above-mentioned federal programs, lacks sufficient accounting policies and procedures to safeguard federal assets, and/or submits inaccurate payment request documentation and/or late demographic reports. On-site monitoring shall consist of financial monitoring and programmatic compliance. Further information can be found in the Community Program Monitoring manual.

The Community Development Committee shall hold a CAPER (Consolidated Annual Performance Evaluation Report) Public Hearing for the purpose of reviewing activity accomplishments for the previous year within 90 days after the completion of the City's Community Development Program year. The records presented at this hearing are available during normal business hours for public inspection in the Community Development Office.

The City of Duluth will strive to ensure all relevant projects positively address progress on Fair Housing efforts. During project proposal evaluation, funding decision making, and program performance monitoring integration of the strategies outlined in the City of Duluth's most current Analysis of Impediments to Fair Housing Plan will be evaluated. Projects that can impact and further implement removing or eliminating impediments to fair housing will be prioritized and connections to further the city's fair housing goals will be encouraged. The city will report progress on fair housing strategies annually with the completion of the CAPER and monitoring report.