



2024 Annual Action Plan
City of Roswell

Roswell Grants Division
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Executive Summary

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

1. Introduction

The City of Roswell is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD). This designation qualifies the City to receive grant funding from the Community Development Block Grant (CDBG) program administered by HUD. The CDBG program allocates annual grants to assist in the development of viable communities by providing decent housing, a suitable living environment, and to expand economic opportunities, principally for low and moderate income (LMI) persons (earning at or below 80 percent of the area median income). To receive an annual allocation of federal grant funds from HUD, the City is required to create a five year Consolidated Plan (strategic plan) and five subsequent one-year Annual Action Plans (AAP). This Annual Action Plan covers the intended use of the City's Program Year 2024 CDBG award in the amount of \$407,830.

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

2. Summarize the objectives and outcomes identified in the Plan

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

During the development of the City's 2023-2027 Consolidated Plan, the City identified two main goals for the next five years: 1) Improve access to and quality of affordable housing, and 2) Planning and administration for the CDBG program. The City already allocated 2023 CDBG funding to the demolition

and clearance of the Roswell Housing Authority's (RHA) Pelfrey Pines Apartments located at 199 Grove Way. A recent engineering study determined that the property was structurally unsound and unsafe. After the RHA had relocated the residents in 2021 and 2022, the City committed the funds to remove the blighted property.

For continued support of that initiative in 2024, the City pledged its support of the RHA's Low-Income Housing Tax Credit (LIHTC) application to the Georgia Department of Community Affairs (DCA) for a Phase I redevelopment of the Pelfrey Pines site. The application was approved in October 2023 and will create 102 units of affordable housing, an increase of 62 affordable units. The City has decided to fulfill its pledge to the RHA by applying for a Section 108 loan in the amount of \$2,039,150 through HUD, and it will use a portion of its 2024 CDBG allocation and subsequent annual CDBG allocations to pay back the loan.

HUD's Section 108 loan program allows entitlement communities to borrow up to five times their annual CDBG allocations through a low interest loan program. The loan period cannot exceed 20 years, but the City anticipates paying back the loan in under 10 years. The Roswell Housing Authority has agreed to use real property as collateral for the loan through a subrecipient agreement with the City. While CDBG funds generally cannot be used for new construction, they can be used for site work. The City will use the loan funds to reimburse the RHA's site work related to the Phase I redevelopment. The City will allocate \$326,264 (80%) of its 2024 CDBG funds to make the first payments on the loan and will retain \$81,566 (20%) of its 2024 CDBG funds for administration and planning expenses related to managing the HUD programs. The City will continue to use 2025 CDBG funds and beyond until the loan is repaid.

The current Phase I proposal is comprised of 99 one-bedroom units and 3 two-bedroom units. Amenities will include a fully equipped fitness room, mailroom, community room, activity room, gazebo, and central laundry. All units will be set aside as LIHTC units at the 30%, 60%, and 80% Area Median Income (AMI) levels.

The City intends to submit the Section 108 loan application in September 2024. In accordance with the City's Citizen Participation Plan (CPP), the public will have 30-days to comment on the draft application beforehand with a notice about that comment period being issued in July-August of 2024. The loan application can take 90-180 days to approve, but the Phase I redevelopment is expected to begin in 2025.

3. Evaluation of past performance

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

During the first year of its 2023-2027 Consolidated Plan, the City of Roswell allocated \$353,657 in 2023 CDBG funds and \$80,362.65 in prior year CDBG funds to the demolition and clearance of the hazardous

units at the RHA's Pelfrey Pines Apartments. The units were built in the 1980's and had recently been deemed structurally unsound by an engineering report. The RHA received permission from HUD in October 2023 to relocate the residents and demolish and clear the site.

Meanwhile, the RHA also leveraged the City's commitment to submit a Low-Income Housing Tax Credits (LIHTC) application to the Georgia Department of Community Affairs (DCA) to redevelop the site with 102 affordable housing units. That LIHTC application was approved in the fall of 2023, and the City began the environmental review process for the demolition and clearance of the site. The environmental review process was completed in the spring of 2024 and the procurement was finalized in the summer of 2024. The project should be complete by the end of 2024, removing a hazardous and blighted property from the neighborhood.

The City also allocated \$88,414 in 2023 CDBG funds to administration and planning related to the management of the City's HUD programs. These funds are used to retain a full-time Grants Specialist that oversees HUD programs and works with the Roswell Housing Authority to ensure activities remain in compliance with federal regulations. Additionally, the administration and planning funds help the City pay for plan development, advertising, and fair housing activities.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Roswell first engaged the public with the development of its current five-year Consolidated Plan in 2023. The plan identified the improvement of affordable housing as the priority need for the City. It also identified the Roswell Housing Authority's major redevelopment of Pelfrey Pines as a key component of addressing this need. The plan laid out the City's strategy for allocating 2023 CDBG funds to the demolition and clearance of a hazardous and blighted property, and the City's intention to leverage future years' CDBG funds to apply for a Section 108 Loan that could support the RHA's redevelopment plans. Multiple public meetings were held along with a 30-day public comment period that resulted in the City's submission, and HUD's subsequent approval of, the City's 2023-2027 Consolidated Plan.

On July 9, 2024 City staff made a public presentation at the Administration, Finance, and Recreation and Parks Committee Meeting about the City's intent to move forward with the Section 108 Loan application and submission of its 2024 Annual Action Plan. In accordance with the City's Citizen Participation Plan (CPP), the City opened a 30-day public comment period from July 12, 2024 to August 12, 2024. The public notice was posted in the July 11, 2024 Alpharetta-Roswell Herald, on the City's website, and through Facebook and Nextdoor. An electronic copy of the draft was available on the City's website, and hard copies were available at City Hall, the Roswell Housing Authority, and both Roswell libraries. Comments were accepted through the City's CDBG program email and the public was given an opportunity to comment at August 12, 2024 City Council Meeting.

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 City received nine total questions or comments from six residents. City staff issued responses to all inquiries. Many of the questions focused on the details of the Section 108 Loan and the structure of the RHA's Phase I redevelopment. Other comments were related to the current conditions of the RHA's remaining affordable housing units and requested that the City consider using part of its 2024 CDBG funds to address those issues in lieu of allocating the funds to the repayment of the loan. Please see the City's Citizen Participation and Comments in the Attachments Section for all comments and responses.

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

All comments were accepted, but were not necessarily incorporated into the 2024 Annual Action Plan. Please see the Citizen Participation and Comments in the Attachments Section for all comments and responses.

7. Summary

The City received nine total comments from six residents. Questions about the Section 108 Loan were satisfactorily addressed. City leadership consulted with staff and the Roswell Housing Authority to review the comments regarding the condition of the remaining RHA units. Many of the units are over 50 years-old and in need of constant maintenance, but a recent third-party inspection found no health and safety issues. The City will explore using any unexpended prior-year CDBG resources to address priority repair issues at the RHA, and it will consider amending this AAP or the loan repayment schedule if needed.

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

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

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

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

Table 1 – Responsible Agencies

Narrative (optional)

The City of Roswell is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD) and is the lead agency for overseeing the City's Community Development Block Grant (CDBG).

Consolidated Plan Public Contact Information

City of Roswell
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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City began the consultation process with the development of its Five-Year Consolidated Plan in 2022. It worked with BluLynx Solutions LLC to release a community needs survey and held multiple meetings with nonprofits, RHA residents, and the general public. Through the process, the City determined its key priority need was improving affordable housing. The City then allocated 2023 CDBG funds to the demolition and clearance of a recently condemned RHA property located at 199 Grove Way. It also decided to leverage its future CDBG funding to apply for a Section 108 Loan to assist with the redevelopment of the RHA's aging housing stock.

In 2023, the City worked with the RHA and its development partner, Pennrose LLC, to ensure the successful submission of a LIHTC application. That application was approved in October 2023, and the RHA hopes to close on the tax credits in the winter of 2023. The City has also worked with RHA and its partners to draft a Section 108 Loan application, which is currently posted for public comment until August 26, 2023. The City plans to submit its application in September 2024 with the RHA slated to start its redevelopment in the summer of 2025.

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

The City of Roswell does not currently manage any public housing. Public housing within the City's jurisdiction is managed by the Roswell Housing Authority (RHA). The RHA currently maintains 51 housing units. The City has worked diligently with RHA leadership over the last three years to assist with its redevelopment efforts.

The City has a limited number of nonprofit and governmental health agencies in the area, but it did consult its area nonprofits when creating its current Consolidated Plan. The City has recently used CDBG funds to help individuals with intellectual or developmental disabilities (IDD) through an adaptive summer camp.

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

The City does not have an official HUD-designated CoC in its area. However, in February 2012, nine local nonprofit agencies working in various roles to promote and provide affordable housing in North Fulton signed a Memorandum of Understanding (MOU) to formalize their collaboration as the North Fulton Housing and Homeless Continuum of Care. As stated in the MOU, the purpose of the Continuum is to

provide “a collaboration of non-profit agencies helping individuals, children and families facing housing crises through comprehensive and seamless delivery of unduplicated services.” The Continuum of Care consists of North Fulton Community Charities, The Drake House, HomeStretch/Housing Initiative of North Fulton, Find a Way Home, Housing Authority of the City of Roswell, Family Promise of Fulton County, Community Action Center, Stand Up for Kids, and Habitat for Humanity-North Central Georgia. The City works with many of the nonprofit organizations participating in the Continuum of Care and values their insight as part of the Roswell Community.

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

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

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Roswell Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City has been working closely with RHA leadership over the last three years to develop a LIHTC application and Section 108 Loan for a multi-phase redevelopment that will initially replace 40 hazardous affordable units with 102 new affordable units.

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

The City consults with all interested agencies when applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	North Fulton Housing and Homeless Continuum of Care	The City met with these organizations on 9-19-22 as part of the development process of its 2023-2027 Consolidated Plan. The City continues to work with many of them through its Nonprofit Partnership Program (NPP), which meets quarterly.

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

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

On July 9, 2024, the City presented a timeline for the submission of its 2024 Annual Action Plan (AAP) and the Section 108 Loan application at the public Administration, Finance, and Recreation and Parks Committee Meeting. On July 11, 2024 the City ran a legal ad in the Alpharetta-Roswell Herald announcing the opening of its public comment period for the draft of the 2024 AAP. The City also announced the public comment period through its website, its Facebook page, and its NextDoor page. In accordance with the City's Citizen Participation Plan (CPP), drafts of the plan were available on the City's website, City Hall, the Roswell Housing Authority, the Roswell Public Library, and the East Roswell Public Library. The public comment period concluded on August 12, 2024, and the Roswell Mayor and Council took public input during that night's City Council meeting. In total, the City received nine written public comments from six Roswell residents.

City staff issued responses to all comments and the Mayor, City Council, and Executive Director of the Roswell Housing Authority also provided more information at the August 12 City Council Meeting. Some of the public had questions pertaining to the structure of the Section 108 Loan and the overall redevelopment plans of the Roswell Housing Authority, which were clarified in responses. Other public comments were related to the condition of the Roswell Housing Authority's remaining units and the possibility of using CDBG funds to improve those conditions. The RHA followed up with the residents directly and at its public board meeting on August 13, 2024. The RHA had recently conducted a third-party inspection that identified no health and safety issues. Many of the RHA's remaining units are 70 years-old and the needed repairs are currently outpacing the availability of funds. The RHA stressed that it has to prioritize the most severe repairs first. Finally, some of the comments requested that the City allocate part of its CDBG funds to making repairs to the remaining units. The City is reviewing this option and will consider allocating unexpended prior-year funding or amending the AAP as needed. However, City staff informed the public of the challenges of ensuring the repairs were eligible for CDBG funds as some, such as cabinet doors not shutting correctly or resealing windows, would be considered ineligible general maintenance. Additionally, the remaining units are slated to be replaced in the next few years, which could trigger disposition restrictions.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	Public hearing on Thursday March 21, 2024 to discuss 2023 CAPER and CDBG plans. No one attended the meeting.	n/a	n/a	
2	Public Meeting	Non-targeted/broad community	Staff made a presentation about the timeline of the 2024 Annual Action Plan (AAP) draft and the Section 108 Loan application draft. Public is not allowed to comment at these meetings, but they can attend and the meeting is broadcast live on Facebook and a recording is available on the City's website.	n/a	n/a	

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)
3	Newspaper Ad	Non-targeted/broad community	This was a legal ad posted in the July 11, 2024 Alpharetta and Roswell Herald announcing the public comment period. Please see the attachments section for a copy of the ad and a summary of comments.	Please see the attachments section for a summary of comments.	n/a	
4	Internet Outreach	Non-targeted/broad community	This was a notice posted on the City's Facebook page announcing the public comment period. Please see the attachments section for a copy of the notice and a summary of comments.	Please see the attachments section for a summary of comments.	n/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Internet Outreach	Non-targeted/broad community	This was a notice posted on the City's Nextdoor page announcing the public comment period. Please see the attachments section for a copy of the notice and a summary of comments.	Please see the attachments section for a summary of comments.	n/a	
6	Public Hearing	Non-targeted/broad community	This was the City Council Meeting on August 12, 2024. City staff gave a presentation about the public comments received to date, Mayor and City Council discussed the item, and the public was given an opportunity to speak.	Please see the attachments section for a summary of comments.	n/a	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

On June 11, 2024 HUD notified the City that its official 2024 CDB award would be \$407,830. The City is allocating 80 percent of those funds to repaying a Section 108 Loan, which will go towards the Roswell Housing Authority's Phase I redevelopment site work. The Phase I redevelopment will replace the 40 dilapidated and hazardous units at 199 Grove Way with 102 new affordable units.

The City is allocating 20 percent of its funds to administration and planning related to the oversight of its CDBG program. This includes expenses for maintaining a full-time Grants Specialist, advertising, fair housing compliance, and other professional services.

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	407,830	0	0	407,830	0	\$327,000 will go towards repaying a Section 108 Loan that will support the RHA's redevelopment, and \$80,830 will go towards administration and planning.

Table 5 - Expected Resources – Priority Table

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

The City pledged just over \$2 million in support of the Roswell Housing Authority's Low-Income Housing Tax Credit (LIHTC) application to the Department of Community Affairs (DCA). That application was approved in October 2023, and the RHA hopes to close on the tax credits in the winter of 2024. The City's support will come in the form of a Section 108 Loan that is currently posted for public review. The City hopes to submit this loan application in September 2024.

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

The Phase I redevelopment site is 199 Grove Way, which is owned by the RHA.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve access and quality of housing	2023	2027	Affordable Housing	City-Wide	Affordable Housing	CDBG: \$327,000	Rental units constructed: 102 Household Housing Unit
2	Planning and administration	2023	2027	Planning and administration	City-Wide	Administration	CDBG: \$80,830	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve access and quality of housing
	Goal Description	The City is allocating 80 percent, or \$327,000, of its 2024 CDBG funds to repaying a Section 108 Loan from HUD. The loan will be used for site work related to the Roswell Housing Authority's Phase I redevelopment at 199 Grove Way. The project will replace the 40 hazardous units with 102 new affordable units. The City plans to submit the loan application in September, but it is currently available for public review. The RHA hopes to close on its LIHTC funding in the winter of 2024 and begin construction in the summer of 2025.
2	Goal Name	Planning and administration
	Goal Description	The City is allocating 20 percent, or \$80,830, of its 2024 CDBG funds to program administration and planning. These funds will be used to retain the full-time Grants Specialist along with advertising, fair housing compliance, and other professional services related to the CDBG program.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City's two projects for program year 2024 CDBG funds are the Year 1 repayment of a Section 108 Loan and administration and planning. The City plans to submit the Section 108 Loan application in the amount of \$2,039,000 in September 2024, and it will use 80 percent, or \$327,000, of its 2024 CDBG funds to make the Year 1 repayments to HUD. The City will use 20 percent, or \$80,830, of its 2024 CDBG funds for administration and planning which will help the City retain a full-time Grants Specialist to work with the Roswell Housing Authority to ensure funding is spent correctly and in compliance with HUD regulations. The administration and planning will also help pay for advertising, fair housing initiatives, and other professional services.

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

The City determined through the development of its 2023-2027 Consolidated Plan that its main priority need was improving affordable housing options.

AP-38 Project Summary

Project Summary Information

Project	Goals Supported	Geographic Target	Needs Addressed	Funding	Target Completion Date
Section 108 Loan Repayment	Access and Quality of Housing	City-Wide	Affordable Housing	\$327,000	7/1/2026
CDBG Administration and Planning	Planning and Administration	City-Wide	Administration	\$80,830	12/31/2025

AP-50 Geographic Distribution – 91.220(f)

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

The funds will benefit the 114.05 Census Tract, but the Roswell Housing Authority assists residents throughout the City and state.

Geographic Distribution

Target Area	Percentage of Funds
City-Wide	100
Census Tract 011405-Block Group 3	

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The funds were not distributed based on a geographic need.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City has allocated 80 percent, or \$327,000, to improving affordable housing. The funds will be used to partially repay a Section 108 Loan in the amount of \$2,039,000 that is going to help the RHA redevelopment 199 Grove Way with 102 new affordable housing units.

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

Table 8 - One Year Goals for Affordable Housing by Support Requirement

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

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion

The City does not anticipate the redevelopment construction being completed in 2025. The completion date is estimated for summer of 2026, and the City will then be able to set a goal of the production of 102 new affordable units.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

The City allocated \$327,000 to repay a \$2,039,000 Section 108 Loan. The loan will go towards site work at 199 Grove Way, which is the RHA's old Pelfrey Pines apartments. The apartments were condemned and will be torn down in the fall of 2024, and the site work will begin in 2025. The project is anticipated to be completed by May 2026 and will create 102 affordable public housing units.

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

In 2021, the City allocated \$75,000 of its CDBG-CV funds to the RHA to hire a Tenant Services Coordinator, which worked with residents on job training and financial management in the wake of the pandemic.

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

No, the Roswell Housing Authority is not designated as troubled.

Discussion

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

Introduction

Roswell will continue to work closely with agencies affiliated with the North Fulton Community Coalition and the North Fulton Housing and Homeless Continuum of Care. The City will look to support these local organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. All of these organizations played a key role in the development of the City's new 2023-2027 Consolidated Plan.

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

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

Roswell will continue to work closely with agencies affiliated with the North Fulton Community Coalition and the North Fulton Housing and Homeless Continuum of Care. The City will look to support these local organizations that assess the needs of the homeless to create a more robust social service system to address unmet needs. All of these organizations played a key role in the development of the City's new 2023-2027 Consolidated Plan.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

The City regularly collaborates with the members of the North Fulton County Housing and Homeless

Continuum of Care, a nine-member coalition of local nonprofit organizations bound by a memorandum of understanding to help individuals, children, and families facing housing crises. The City works closely with CoC member organizations to provide foundational support for these organizations to be able to continue to provide needed services to the residents of the Roswell community. The CoC members played a vital part in the development of the City's 2023-2027 Consolidated Plan.

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

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

Discussion

In July 2022, the City hired BluLynx Solutions to help develop the City's new 2023-2027 Consolidated Plan. The plan compiled data helpful data from numerous sources and was crucial in the City identifying its priority need to improve affordable housing options.

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

Introduction:

The City worked with BluLynx Solutions to develop its 2023 Analysis of Impediments to Fair Housing (AI) Plan. The main goal identified was to promote the redevelopment of distressed areas and buildings to address affordability for lower income households. The City allocated 2023 CDBG funds to the demolition and clearance of the Roswell Housing Authority's hazardous and blighted apartments at 199 Grove Way. The City then pledged \$2 million in support of the RHA's LIHTC redevelopment project through a Section 108 Loan.

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

Other ongoing actions that are being promoted or considered include: The support and encouragement to both private developers and non-profit housing agencies to redevelop areas where pockets of poverty and sub-standard housing exist; encouragement for the development, construction, and/or rehabilitation of mixed income housing in the City; the surveying of existing residential, mixed-use residential/commercial, and vacant structures to better utilize space for additional housing; providing financial assistance to seniors and lower-income households in the City for home improvements so they can remain in their residences; the development of a housing rehabilitation program with low-interest loans/grants in lower-income neighborhoods where there is the highest percentage of vacant and deteriorated housing; and the encouragement of development and/or rehabilitation of workforce housing for income-eligible City employees and other City residents.

Discussion:

Along with the aforementioned actions currently underway, the City intends to use a portion of its administration and planning funds to conduct fair housing training for residents and nonprofit stakeholders in the winter of 2024.

AP-85 Other Actions – 91.220(k)

Introduction:

Along with its usual efforts to foster and maintain relationships with its valued nonprofits, the City hired BluLynx Solutions in July 2022 to assist in the development of its new 2023-2027 Consolidated Plan and Analysis of Impediments to Fair Housing Choice (AI). Through this planning process, the City identified improving affordable housing options as its priority need.

Actions planned to address obstacles to meeting underserved needs

The City will continue to work with its nonprofits to identify and address obstacles to meeting underserved needs. The City meets regularly with its 26-member Nonprofit Partnership Program and these organizations will play a vital role in identifying underserved needs in the future.

Actions planned to foster and maintain affordable housing

The City has committed over \$2 million to help the Roswell Housing Authority redevelopment 199 Grove Way's 40 dilapidated units to 102 new affordable units.

Actions planned to reduce lead-based paint hazards

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

Actions planned to reduce the number of poverty-level families

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

Actions planned to develop institutional structure

The City recognizes the need to maintain a high level of coordination on projects involving all its departments, County departments, and/or nonprofit organizations. This collaboration guarantees an

efficient use of resources with maximum output in the form of accomplishments.

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

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

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

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

Discussion:

In addition to the continual review of the City's new CDBG planning documents, the City will attempt to build on its Nonprofit Partnership Program and evaluate other funding resources that could benefit the community.

Program Specific Requirements

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

Introduction:

The City doesn't anticipate any program income from this program year.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	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.	100.00%

The City anticipates using 100 percent of its non-administration and planning allocation to benefit low to moderate income individuals.

Attachments

Citizen Participation Comments

Citizen Participation and Comments City of Roswell - 2024 Annual Action Plan

On July 9, 2024, the City presented a timeline for the submission of its 2024 Annual Action Plan (AAP) and the Section 108 Loan application at the public Administration, Finance, and Recreation and Parks Committee Meeting. On July 11, 2024 the City ran a legal ad in the Alpharetta-Roswell Herald announcing the opening of its public comment period for the draft of the 2024 AAP. The City also announced the public comment period through its website, its Facebook page, and its NextDoor page. In accordance with the City's Citizen Participation Plan (CPP), drafts of the plan were available on the City's website, City Hall, the Roswell Housing Authority, the Roswell Public Library, and the East Roswell Public Library. The public comment period concluded on August 12, 2024, and the Roswell Mayor and Council took public input during that night's City Council meeting. In total, the City received nine written public comments from six Roswell residents.

City staff issued responses to all comments and the Mayor, City Council, and Executive Director of the Roswell Housing Authority also provided more information at the August 12 City Council Meeting. Some of the public had questions pertaining to the structure of the Section 108 Loan and the overall redevelopment plans of the Roswell Housing Authority, which were clarified in staff responses. Other public comments were related to the condition of the Roswell Housing Authority's remaining units. The RHA followed up with the residents directly and at its public board meeting on August 13, 2024. The RHA had recently conducted a third-party inspection in June 2024 that identified no health and safety issues. Many of the RHA's remaining units are 70 years-old and the needed repairs are currently outpacing the availability of funds. The RHA stressed that it has to prioritize the most severe repairs first. Finally, some of the comments requested that the City allocate part of its CDBG funds to making repairs to the remaining units. The City is reviewing this option and will consider allocating unexpended prior-year funding or amending this AAP as needed. However, City staff informed the public of the challenges of ensuring the repairs were eligible for CDBG funds as some requests, such as cabinet doors not shutting correctly or resealing windows, would be considered as ineligible general maintenance. Additionally, the remaining units are slated to be replaced in the next few years, which could trigger disposition restrictions.

Please see the attachments below for the public notices, the public comments with responses, and a copy of the City's 2023 Citizen Participation Plan (CPP).

Notice Copy

PUBLIC HEARING NOTICE

THE CITY OF ROSWELL SEEKS PUBLIC COMMENT ON ITS 2024 ANNUAL ACTION PLAN

The City of Roswell is seeking public comment on its 2024 Annual Action Plan (AAP). As an entitlement community eligible to receive assistance under the U. S. Department of Housing and Urban Development (HUD), the City is required to submit the AAP to HUD every year in order to receive funding from the Community Development Block Grant (CDBG Program. This plan provides a framework for identifying housing and community development priorities and addresses how these priorities can be assisted using federal formula block grant programs.

To ensure access to all information, drafts of the documents will be placed on the City of Roswell's website, www.roswellgov.com/cdbg and hard copies are available at:

City of Roswell
Grants Division
38 Hill St., Suite 130
Roswell, GA 30075

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

Housing Authority of the City of Roswell
766 Myrtle Street
Roswell, GA 30075

Roswell Public Library
115 Norcross Street
Roswell, GA 30075

Public comments can be submitted in writing to the City of Roswell, Grants Division, 38 Hill Street, Suite 130, Roswell, GA 30075 or through the City's CDBG Program email, CDBG@roswellgov.com. Per the City's Citizen Participation Plan, the public comment period for the draft of this plan will run for 30 days, starting on Friday July 12, 2024. All comments must be submitted by 10:00 a.m. on Monday August 12, 2024. Please contact Charles Alford, (770) 641-3847, calford@roswellgov.com, with any questions or if translation or interpretation services are needed.

PUBLIC HEARING NOTICE

The City of Roswell is seeking public comment on its 2024 Annual Action Plan (AAP). As an entitlement community eligible to receive assistance under the U.S. Department of Housing and Urban Development (HUD), the City is required to submit the AAP to HUD every year in order to receive funding from the Community Development Block Grant (CDBG) program. This plan provides a framework for identifying housing and community development priorities and addresses how these priorities can be assisted using federal formula block grant programs.

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City of Roswell
Grants Division
38 Hill St., Suite 130
Roswell, Georgia 30075

East Roswell Public Library
2301 Holcomb Bridge Road
Roswell, GA 30078

Housing Authority of the City of Roswell
766 Myrtle Street
Roswell, Georgia 30075

Roswell Public Library
115 Norcross Street
Roswell, GA 30075

Public comments can be submitted online to the City of Roswell, Georgia Division, 3800 Hill Street, Suite 130, Roswell, GA 30075 or through the City's eCGG Portal: www.ci.roswell.ga.us/eCGG. Per the City's Citizen Participation Plan, the public comment period for the draft of this plan will run for 30 days, starting on Friday July 12, 2024. All comments must be submitted by 10:00 a.m. on Monday August 12, 2024. Please contact Charles Allford, (770) 541-3547; callford@roswell.gov, with any questions or if translation or interpretation services are needed.

Newspaper Delivery Route Openings with Appen Media Group

We are looking for one person or couple interested in delivering weekly newspapers in South Forsyth, Alpharetta and the Johns Creek areas.

Requirements: Must have a perfect driving record and background check, reliable transportation, honest, hard-working and positive attitude.

For more information or to apply, email heid@appenmedia.com and include a paragraph or two about who you are and any relevant background/experience. In the subject line of the email please put "Delivery Route Application".



Senior Product Manager
Alpharetta GA

Responsibilities: Manage life cycle of company's assigned products including complex engineering tasks & energy management networks for electric, water, & gas utility industry. Lead product lifecycle activities, including gathering customer engineering requirements, authoring Product Requirement Documents (PRDs), prioritizing development activities, & managing Investment Plan (IP) & New Product Introduction (NPI) processes for assigned products.

Salary range: \$135,000 – \$146,260/year

Requirements: Bachelor's degree in Comp Sci, EE or related field & 2 years in job offered or 2 years product management/ability manage management systems. Experience must include 1 year working in ability domain with each of following: (i) architecture, internet of things (IoT) concepts; creating & managing networking technologies; Oracle or SQL Server databases; & wireless technologies. Experience may be gained concurrently. Send resume & cover letter to: Lamich-Gyr.Usa@us.ibm.com, Telnet Acquisition, 30000 MIR Creek Rd, Suite 100, Alhambra, CA 91802 or via email to: us.ibm.com/Alhambra.com

Sources: DSC is seeking a Cyber Security and Compliance Specialist to monitor and ensure the security and integrity of the network(s), computer system(s), information security software, and establish baseline configurations.

Required: Bachelor's degree Cyber Security, Computer Information Systems, Computer Science, Information Systems. Must have at least 10 years [11] years of overall security experience and three (3) years of direct experience in technical information security. Proficiency in Linux Gen Operating System, vulnerability management, web and email security, AIC, Mail, EXCHANGER, PMS, CIP, IDS, SI, SSI, IAMS, OWA, DNS, security frameworks, NIST CS, ISO 27001, NICE/PMI, ITAP, Enterprise, ISAP applications, Active Directory, Audit 6800 Data Bus, Private Public, Powerflex, SQL, etc.

Applicants must complete an application prior to 5 PM, July 12, 2014. Apply online: www.saucon.com/career. If you're in a paper application or in alternate format, please contact us at 275-862-7353 extension 2100.

Source: DASH Membership Convention is an Equal Opportunity and Affirmative Action Employer of females, minorities, veterans and individuals with disabilities. Source: DASH is a VEVRAA Federal Contractor. Reasonable accommodations may be made to enable qualified individuals with disabilities and disabled veterans to perform the essential functions. Any/One Disabled.

Deadline to place
a classified ad
is Thursday by 4pm

Software Engineer Consultant (Alpharetta, GA)
Diversifies subject matter expertise (SME) to develop single task using both front and back-end programming within initial pricing, as needed in collaboration w/ biz & tech teams for internal & external client s/w solutions. Design, create, deliver, & achieve others on single project specs for code design & report on initial project status w/ a wide understanding of the application/database to better align instructions & techs. Resumes to: Total System Services LLC, Brian Simons, Associate Director HR Bkx and Compliance, One 1915 W. Alabama GA 31191, 404-468-7346

Part-time



North Judea Community Church, a non-profit in Roswell, Georgia, is seeking a Part Time Down Operations Assistant.

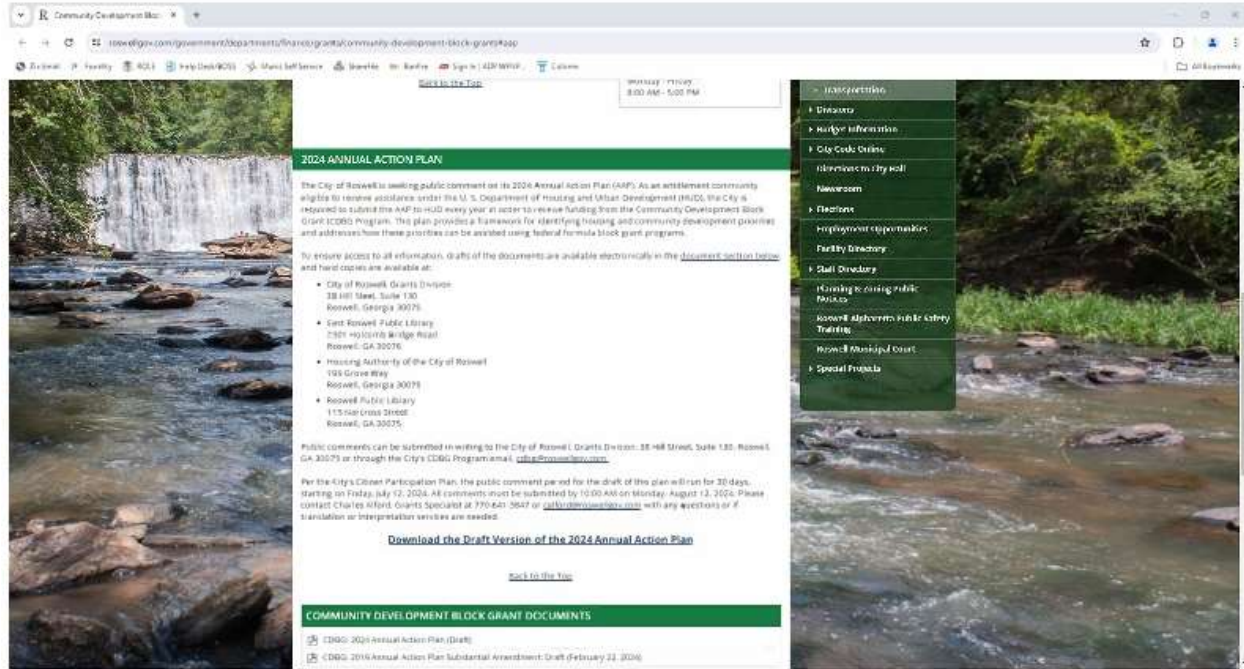
This entry-level heavy position is available now, averages 28 hours per week, and requires the ability to lift up to 25 pounds and work outside during the day.

NGC has been serving individuals and families in the North Hudson area for 40+ years. Our Mission "To Educate, Inspire and Foster Financial Stability in our Community." We provide opportunities for the whole community to thrive. NGC is committed to provide professional development and pathways for advancement to all members of the NGC team. Is this the complete job description, please visit our website at <http://www.ngcny.org/careers>. If you wish to apply, please send your resume to ngc@ngcny.org.

TEO Statement: NTEC is an Equal Opportunity Employer. NTEC does not discriminate based on race, religion, sex, gender identity, sexual orientation, age, non-discriminatory physical or mental disabilities, national origin, veteran status, or any other basis protected by the law. All employment is decided based on qualifications, merit, and business needs.



Post on City Website



Community Development Block Grant

2024 ANNUAL ACTION PLAN

The City of Roswell is seeking public comment on its 2024 Annual Action Plan (AAP). As an entitlement community eligible to receive assistance under the U.S. Department of Housing and Urban Development (HUD), the City is required to submit the AAP to HUD every year in order to receive funding from the Community Development Block Grant (CDBG) Program. This plan provides a framework for identifying housing and community development priorities and addresses how these priorities can be achieved using federal formula block grant programs.

To ensure access to all information, drafts of the documents are available electronically in the [document section below](#) and hard copies are available at:

- City of Roswell, Grants Division
38 Hill Street, Suite 130
Roswell, Georgia 30076
- East Roswell Public Library
7301 Reynolds Bridge Road
Roswell, GA 30076
- Housing Authority of the City of Roswell
105 Grove Way
Roswell, Georgia 30076
- Roswell Public Library
115 Hill Street
Roswell, GA 30076

Public comments can be submitted in writing to the City of Roswell, Grants Division, 38 Hill Street, Suite 130, Roswell, GA 30076 or through the City's CDBG Program email: cdbg@roswellga.gov.

Per the City's Citizen Participation Plan, the public comment period for the draft of this plan will run for 30 days, starting on Friday, July 12, 2024. All comments must be submitted by 10:00 AM on Monday, August 13, 2024. Please contact Charles R. Fort, Grants Specialist at 770-641-3647 or charles.fort@roswellga.gov with any questions or if translation or interpretation services are needed.

[Download the Draft Version of the 2024 Annual Action Plan](#)

[Back to the Top](#)

COMMUNITY DEVELOPMENT BLOCK GRANT DOCUMENTS

- CDBG 2024 Annual Action Plan (Draft)
- CDBG 2016 Annual Action Plan Substantial Amendment Draft (February 22, 2016)

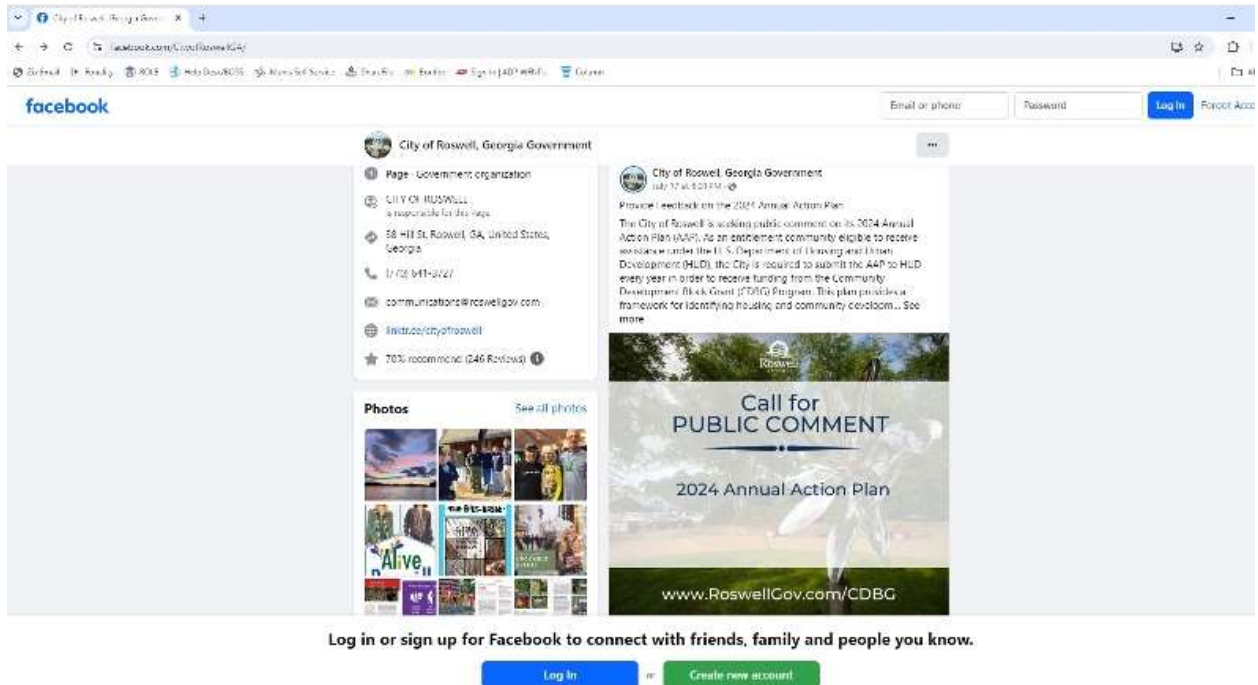
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- Mayor's Office
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- Staff Directory
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- Roswell Municipal Court
- Special Projects

Annual Action Plan
2024

35

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THANK


REPLY



Provide Feedback on the City of Roswell's 2024 Annual Action Plan

Communications Revealed: Jonathan Copsey from City of Roswell
17 Jul

The City of Roswell is seeking public comment on its 2024 Annual Action Plan (AAP) as an ordinance, community rights to review decisions under the U.S. Department of Housing and Urban Development (HUD). The City is required to submit the AAP to HUD every year in order to receive funding from the Community Development Block Grant (CDBG) Program. This plan provides a framework for identifying housing and community development priorities and addresses how these priorities can be assisted using federal funds, block grant programs.



To ensure access to all information, drafts of the documents will be placed on the City of Roswell's website www.roswellga.com/cibg and hard copies are available at:

City of Roswell
Grants Division
38 Hill St., Suite 150
Roswell, GA 30075

First Roswell Public Library
2261 The Green (Orange Road)
Roswell, GA 30075

Housing Authority of the City of Roswell
756 Myrtle Street
Roswell, GA 30075

Roswell Public Library
115 Norcross Street
Roswell, GA 30075

Public comments can be submitted in writing to the City of Roswell, Grants Division, 38 Hill Street, Suite 150, Roswell, GA 30075 or through the City's CDBG Program email, CDBG@roswellga.com for the City's Current Participation Plan, the public comment period on the draft of this plan will run for 30 days, starting on Friday, July 12, 2024. All comments must be submitted by 10:00 a.m. on Monday, August 12, 2024. Please contact Charles Abad, (770) 541-2047, charles@roswellga.com, with any questions or if translation or interpretation services are needed.

17 Jul - Subscribers of City of Roswell is Current

THANK

REPLY

Comment/Response - Gail Bohannon-McCoy 1 of 1

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 12:15 PM
To: 'S. Gail Bohannon McCoy'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: Loan 108
Attachments: city of Roswell 108 loan.docx

Good morning Gail,

I believe the resolution for the 2024 Annual Action Plan (AAP) is being moved to the regular agenda for tonight's Mayor and City Council Meeting at 7:00 p.m. I've been asked to make a brief presentation addressing how CDBG funds could be used to address some of the issues you've mentioned. Unfortunately the City can't make an official determination about the CDBG eligibility of these items until we have more specifics, which we're working to get from the RHA. All of the public comments are being forwarded to Beth Brown and the Roswell Mayor and Council.

Please let me know if you have any other questions.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: S. Gail Bohannon McCoy <gail@groveswaycommunitygroup.org>
Sent: Friday, August 9, 2024 10:36 AM
To: CDBG <CDBG@roswellgov.com>
Subject: Loan 108

EXTERNAL EMAIL

Please except the attachment as my comments 108 Loan Application

--
S. Gail Bohannon McCoy, Director
Grovesway Community Group, Inc.
770-993-4245
www.groveswaycommunitygroup.org
"If We Can Help Somebody"
Follow us on our Facebook Page:
Facebook @[groveswaycommunitygroup](https://www.facebook.com/groveswaycommunitygroup)
Contact us at: groveswaycommunitygroup@gmail.com

"If We Can Help Somebody"

All links scanned by ZixProtect Link Protection. You will be redirected to the ZixProtect Link Center upon clicking any link.

My comments in regard to the city of Roswell's 2024 Annual Action Plan as it relates to the Roswell Housing Authority (Community Development Block Grant program 108 Loan application, 199 Grove Way)

I am a resident of Roswell and I reside at 736 Bush St. I have been aware of some of the problems of the tenants of the Roswell Housing Authority before the city council meeting on July 29, 2024 and subsequent conversations with additional residents have asked why money is not directed to the improvement of these conditions? It has been a run around as to who is responsible for maintaining these apartments.

In the introduction of the city's Annual Plan it states these grants (CDBG) are allocated to "...providing decent housing, a suitable living environment...". The plan goes on by citing the city's first goal is to "Improve...quality of affordable housing...". I will not argue that clearing blighted areas of land will improve living conditions outside the resident's homes; what most affects them, is the inside.

I have been on the property and seen mold in their homes, that appliances do not work, their units are structurally unsound where some of the ceilings are cracked and that water quality is an issue. The residents have documented their requests for assistance and they report that they have not been resolved. The city council says it is not their role to fix these problems.

I am submitting these comments in an attempt to bring more attention to the needs of the current residents. They should be addressed even if the future state of these units is not guaranteed. Funds should be directed to resolving the current problems existing in the units at the Roswell Housing Authority.

S. Gail BohannonMcCoy
736 Bush Street
Roswell, Ga 30075
770-993-4245

Comment/Response - Scott Gardner 1 of 2

Charles Alford

From: Charles Alford
Sent: Monday, August 5, 2024 10:04 PM
To: stgardner96@yahoo.com
Cc: CDBG
Subject: Re: 2024 Action Plan
Attachments: 199 site prep estimate.JPG

Good evening Mr. Gardner,

Please see my responses to your questions in blue below. I've also included a few hyperlinks as well. We've had a few technical difficulties with Outlook today, so let me know if those don't show up on your end. Also, let me know if you have any other questions or comments.

All I found online on the city's website was an Executive Summary. Could you point me to the actual plan?

The City generally just posts a draft of the plan explaining its objectives for the annual allocation, the process for determining said allocation, and any CDBG program accomplishments for the current Five-Year Consolidated Plan to-date. The reasoning for this is that the additions to the final plan mostly include TBD components or redundant attachments that contribute little to the narrative and discourage public review. For instance, the citizen participation section of the final plan is ongoing and will just include an overview of the notices we gave the public and any engagement (like this exchange) that we've had with the public. We also scheduled a public hearing for the Section 108 application on 8/19 at 5:30 in room 220 of City Hall, so any feedback gleaned from that meeting will be included as well, but it's TBD at this point. The final plan includes a list of HUD certifications, which the City Administrator will sign, but only after the Mayor and City Council (M&CC) have passed a resolution to submit the plan, which occurs after the public has had an opportunity to comment. There are also 40+ pages of HUD-required attachments that include documents that the City has already posted on its CDBG site like the [Citizen Participation Plan \(CPP\)](#) and [Analysis of Impediments to Fair Housing Choice Plan \(AI\)](#).

A notice to the draft Section 108 application was posted last week, and that draft can be found [here](#).

In the first paragraph of the Introduction of the Summary it says the CDBG program is to "expand economic opportunities, principally for low and moderate income persons". The 'principally' bothers me. Does this mean the plan may expand economic opportunities for persons who do not have low or moderate income, perhaps with higher income?

Full disclosure: This is HUD's description of the program, but the "principally" is referring to the 70% minimum requirement found at [24 CFR 570.200\(a\)\(3\)](#). At least 70% of the City's aggregate CDBG funds for the program year (less admin/planning allocations) must be used for low and moderate income (LMI) persons. Technically, 30% of the funds can be used for persons above the LMI limit, but these CDBG funds are going towards Phase I of the RHA's redevelopment. Phase I replaces the 40

hazardous units at 199 Grove Way with 102 new units, and all of those units will be designated as affordable under the Low-Income Housing Tax Credit (LIHTC) program.

The Summary of Objectives identifies a goal of improving access to and quality of affordable housing. What is Roswell's 'working' definition of affordable housing?

It's 80% or below the area median income, adjusting for household size. According to HUD's most recent [income tables](#), the median family income for the City is \$106,600. Most of the units for Phase I are one-bedroom (Seniors), so the affordable determination would be a max household income of \$60,200.

I understand the city will be taking on a \$2 million 108 HUD loan for the initial work on Pelfrey Pines and that the RHA will allow the city to use that property as collateral for the loan. Moreover, the City will be using the bulk of the HUD CDBG grant funds to pay back the loan. This reminds me a Peter-Paul thing, but if the Feds don't mind, I guess we'll just hope that there are no changes to the grant program over the next 10 years. However, previously, the RHA has shown itself to be beyond incompetent and I question whether it can handle this project for the immediate future, much less the next 10 years. So, my questions are these: who in the city oversees the RHA and will hold them accountable? Will it be the Grants Specialist? Is this Specialist a city employee?

The Mayor and Council ultimately hold the RHA accountable through the appointment of its board members, and the board members are then responsible for hiring the executive director. The M&CC made a lot of changes to the RHA board in 2017, and the board brought in Beth Brown as ED. Beth is very experienced with overseeing housing authorities and tax credit projects, but it has taken time to put all the pieces together. The RHA has also been receiving support from its developer, Pennrose LLC, which will also be responsible for overseeing the construction.

Regarding some of the aforementioned pieces, the development of the deal included approvals from multiple divisions of the Georgia Department of Community Affairs (DCA) because of the tax credits and the state's HOME Grant funds. It also had approvals from multiple divisions of HUD because of the City's prospective loan funds, the Housing Trust Fund (HTF) underwriting, and the Rental Assistance Demonstration (RAD) Program units that are being replaced. These organizations have a vested interest in ensuring the project's success and will provide continual oversight throughout the life of the project (and beyond).

The City's Grants Division is responsible for overseeing the CDBG program with support from other members of the City's Finance and Legal teams. The Grants Division is comprised of City employees, led by Grants Manager Danny Blitch. The Grants Specialists are Allie Cook and myself. I oversaw the CDBG program for about 12 years, but Allie will be taking on a bigger role as the RHA project progresses. The Grants Division role will be to work with the RHA and Pennrose to ensure the City's funds remain in compliance with both the CDBG and Section 108 programs.

Lastly, it isn't clear to me what specific work will be done in 2024. Could you clarify that? Also, specifically, what does 'site work' entail?

The City is working with the RHA to demolish 199 Grove Way by October 2024. The RHA is planning to close on the LIHTCs in November 2024. Design and engineering for the new building is also

underway, and the RHA hopes to start construction in May 2025. In regards to site-work, HUD basically considers it as anything related to housing construction that's not building vertically. Once you start going up, they consider it new construction, which is generally an ineligible use for CDBG funds. A list of the site-work expenses is attached.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: STGardner <stgardner96@yahoo.com>
Sent: Thursday, August 1, 2024 10:27 PM
To: Charles Alford <calford@roswellgov.com>
Subject: 2024 Action Plan

EXTERNAL EMAIL

Mr. Alford

The notice in the newspaper said to contact you regarding questions about the 2024 Annual Action Plan. I have a few.

All I found online on the city's website was an Executive Summary. Could you point me to the actual plan?

In the first paragraph of the Introduction of the Summary it says the CDBG program is to "expand economic opportunities, principally for low and moderate income persons". The 'principally' bothers me. Does this mean the plan may expand economic opportunities for persons who do not have low or moderate income, perhaps with higher income?

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3

Thank you

Scott Gardner
12030 Brookfield Club Dr.

Spreadsheet Report
199 Grove Way Apartments

base	Description	Takeoff Quantity	Labor Amount	Material Amount	Sub Amount	Total Cost/Unit	1
	SITEWORK						
10	"Testing"	2.76 acre			16,000	5,797.10 /acre	
00	"Earthwork"	2.76 acre			690,000	250,000.00 /acre	
23	Foundation Wall Backfill	2.76 acre			93,423	33,848.91 /acre	
29	Earthwork Miscellaneous	2.76 acre		102,000	84,000	67,391.30 /acre	
30	Engineering & Layout	2.76 acre			35,000	12,681.16 /acre	
80	"Termite Control"	2.76 acre			4,084	1,479.64 /acre	
50	"Special Foundations"	2.76 acre			189,189	68,546.74 /acre	
02	Temp Roads & Parking	2.76 acre			7,000	2,536.23 /acre	
10	Asphalt Paving	2.76 acre			251,005	90,943.84 /acre	
20	Concrete Paving	2.76 acre			83,500	30,253.62 /acre	
25	Curb & Gutter	2.76 acre			66,840	24,217.39 /acre	
30	Walks	2.76 acre			88,567	32,089.31 /acre	
00	"Storm Drainage"	2.76 acre			79,000	28,623.19 /acre	
00	"Site Improvements"	2.76 acre			437,535	158,527.17 /acre	
30	Fences & Gates	2.76 acre			87,725	31,784.42 /acre	
43	Parking Bumpers	2.76 acre			2,500	905.80 /acre	
70	Site Furnishings	2.76 acre			50,000	18,115.94 /acre	
00	"Landscaping"	2.76 acre			153,000	55,434.78 /acre	
	SITEWORK	102.00 unit		102,000	2,418,367	24,709.48 /unit	

Comment/Response - Scott Gardner 2 of 2

Charles Alford

From: Charles Alford
Sent: Wednesday, August 14, 2024 12:12 PM
To: 'STGardner'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: 2024 Action Plan

Good afternoon Mr. Gardner,

Our responses are below in blue. Please let me know if you have any other questions.

If the HUD CDBG grant program were to end, would the city be on the hook for the 108 \$2 million loan? Would the city then retain "ownership" of the Pelfrey property?

The City is responsible for the loan even if the CDBG program were to end. The collateral currently being used for the loan is Myrtle Street Apartments, which isn't considered part of Pelfrey Pines. The City will have a lien on the property, and HUD would take second position. The appraisal is underway, but we expect the property value to exceed what the City needs to cover the loan. The new apartments that will be constructed at the Pelfrey Pines location will be owned by Pennrose (the developer), the RHA, and other investors attached to the tax credits. The City won't have any ownership in the new property.

There was mention of \$30 million for the rest of the project. Where is that coming from?

- Tax Credit Equity - \$17.5M
- Georgia DCA HOME Investment Partnership Program Grant (through HUD) - \$5M
- Georgia DCA Housing Trust Fund (also through HUD) - \$3M
- Roswell Housing Authority - \$2M
- Fulton County - \$2M
- Deferred Development Fee - \$.5M

Since the RHA is not part of Roswell government, do you know under what authority the RHA was created?

Short answer: The RHA was created by the State and enacted by the City.

Longer answer: It is governed under U.S. Housing Act of 1937 as amended, the Acts of the Georgia Legislature, O.C.G.A. Title 8, Chapter 3, Articles 1-137, and by authorization of the City of Roswell City Council through the formation of an on-going Cooperation Agreement. RHA is recognized as a public body corporate and politic "Public Housing Authority" by the United States of America Department of Housing and Urban Development and the State of Georgia.

Do you know if the RHA has any other properties under its purview?

The RHA has three properties under its purview. The property across the street from 199 Grove Way (sometimes referred to as The Quad) has six quadruplexes. These units are considered part of Pelfrey Pines but won't be replaced until the Phase II redevelopment. The RHA also owns the apartment units on Grove Place that run behind the Veranda. Both of these properties are associated with various HUD programs (RAD, Section 8 vouchers, etc.). Lastly, the RHA owns and operates Myrtle Street Apartments, which is rent-controlled, but not associated with HUD programs.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: STGardner <stgardner96@yahoo.com>
Sent: Tuesday, August 13, 2024 4:24 PM
To: Charles Alford <calford@roswellgov.com>
Cc: CDBG <CDBG@roswellgov.com>
Subject: Re: 2024 Action Plan

EXTERNAL EMAIL

Mr. Alford

I was at the council meeting last night and I heard you and others speak about the CDBG and plans for the Pelfrey apartments. I've thought of some more questions that I hope you can address.

If the HUD CDBG grant program were to end, would the city be on the hook for the 108 \$2 million loan? Would the city then retain "ownership" of the Pelfrey property?

There was mention of \$30 million for the rest of the project. Where is that coming from?

Since the RHA is not part of Roswell government, do you know under what authority the RHA was created?

Do you know if the RHA has any other properties under its purview?

Thanks
Scott Gardner

On Monday, August 5, 2024 at 10:03:35 PM EDT, Charles Alford <calford@roswellgov.com> wrote:

Good evening Mr. Gardner,

Please see my responses to your questions in blue below. I've also included a few hyperlinks as well. We've had a few technical difficulties with Outlook today, so let me know if those don't show up on your end. Also, let me know if you have any other questions or comments.

All I found online on the city's website was an Executive Summary. Could you point me to the actual plan?

The City generally just posts a draft of the plan explaining its objectives for the annual allocation, the process for determining said allocation, and any CDBG program accomplishments for the current Five-Year Consolidated Plan to-date. The reasoning for this is that the additions to the final plan mostly include TBD components or redundant attachments that contribute little to the narrative and discourage public review. For instance, the citizen participation section of the final plan is ongoing and will just include an overview of the notices we gave the public and any engagement (like this exchange) that we've had with the public. We also scheduled a public hearing for the Section 108 application on 8/19 at 5:30 in room 220 of City Hall, so any feedback gleaned from that meeting will be included as well, but it's TBD at this point. The final plan includes a list of HUD certifications, which the City Administrator will sign, but only after the Mayor and City Council (M&CC) have passed a resolution to submit the plan, which occurs after the public has had an opportunity to comment. There are also 40+ pages of HUD-required attachments that include documents that the City has already posted on its CDBG site like the [Citizen Participation Plan \(CPP\)](#) and [Analysis of Impediments to Fair Housing Choice Plan \(AI\)](#).

A notice to the draft Section 108 application was posted last week, and that draft can be found [here](#).

In the first paragraph of the Introduction of the Summary it says the CDBG program is to "expand economic opportunities, principally for low and moderate income persons". The 'principally' bothers me. Does this mean the plan may expand economic opportunities for persons who do not have low or moderate income, perhaps with higher income?

Full disclosure: This is HUD's description of the program, but the "principally" is referring to the 70% minimum requirement found at [24 CFR 570.200\(a\)\(3\)](#). At least 70% of the City's aggregate CDBG funds for the program year (less admin/planning allocations) must be used for low and moderate income (LMI) persons. Technically, 30% of the funds can be used for persons above the LMI limit, but these CDBG funds are going towards Phase I of the RHA's redevelopment. Phase I replaces the 40 hazardous units at 199 Grove Way with 102 new units, and all of those units will be designated as affordable under the Low-Income Housing Tax Credit (LIHTC) program.

The Summary of Objectives identifies a goal of improving access to and quality of affordable housing. What is Roswell's 'working' definition of affordable housing?

It's 80% or below the area median income, adjusting for household size. According to HUD's most recent [income tables](#), the median family income for the City is \$106,600. Most of the units for Phase I are one-bedroom (Seniors), so the affordable determination would be a max household income of \$60,200.

I understand the city will be taking on a \$2 million 108 HUD loan for the initial work on Pelfrey Pines and that the RHA will allow the city to use that property as collateral for the

loan. Moreover, the City will be using the bulk of the HUD CDBG grant funds to pay back the loan. This reminds me a Peter-Paul thing, but if the Feds don't mind, I guess we'll just hope that there are no changes to the grant program over the next 10 years. However, previously, the RHA has shown itself to be beyond incompetent and I question whether it can handle this project for the immediate future, much less the next 10 years. So, my questions are these: who in the city oversees the RHA and will hold them accountable? Will it be the Grants Specialist? Is this Specialist a city employee?

The Mayor and Council ultimately hold the RHA accountable through the appointment of its board members, and the board members are then responsible for hiring the executive director. The M&CC made a lot of changes to the RHA board in 2017, and the board brought in Beth Brown as ED. Beth is very experienced with overseeing housing authorities and tax credit projects, but it has taken time to put all the pieces together. The RHA has also been receiving support from its developer, Pennrose LLC, which will also be responsible for overseeing the construction.

Regarding some of the aforementioned pieces, the development of the deal included approvals from multiple divisions of the Georgia Department of Community Affairs (DCA) because of the tax credits and the state's HOME Grant funds. It also had approvals from multiple divisions of HUD because of the City's prospective loan funds, the Housing Trust Fund (HTF) underwriting, and the Rental Assistance Demonstration (RAD) Program units that are being replaced. These organizations have a vested interest in ensuring the project's success and will provide continual oversight throughout the life of the project (and beyond).

The City's Grants Division is responsible for overseeing the CDBG program with support from other members of the City's Finance and Legal teams. The Grants Division is comprised of City employees, led by Grants Manager Danny Blitch. The Grants Specialists are Allie Cook and myself. I oversaw the CDBG program for about 12 years, but Allie will be taking on a bigger role as the RHA project progresses. The Grants Division role will be to work with the RHA and Pennrose to ensure the City's funds remain in compliance with both the CDBG and Section 108 programs.

Lastly, it isn't clear to me what specific work will be done in 2024. Could you clarify that? Also, specifically, what does 'site work' entail?

The City is working with the RHA to demolish 199 Grove Way by October 2024. The RHA is planning to close on the LIHTCs in November 2024. Design and engineering for the new building is also underway, and the RHA hopes to start construction in May 2025. In regards to site-work, HUD basically considers it as anything related to housing construction that's not building vertically. Once you start going up, they consider it new construction, which is generally an ineligible use for CDBG funds. A list of the site-work expenses is attached.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: STGardner <stgardner96@yahoo.com>
Sent: Thursday, August 1, 2024 10:27 PM
To: Charles Alford <calford@roswellgov.com>
Subject: 2024 Action Plan

EXTERNAL EMAIL

Mr. Alford

The notice in the newspaper said to contact you regarding questions about the 2024 Annual Action Plan. I have a few.

All I found online on the city's website was an Executive Summary. Could you point me to the actual plan?

In the first paragraph of the Introduction of the Summary it says the CDBG program is to "expand economic opportunities, principally for low and moderate income persons". The 'principally' bothers me. Does this mean the plan may expand economic opportunities for persons who do not have low or moderate income, perhaps with higher income?

The Summary of Objectives identifies a goal of improving access to and quality of affordable housing. What is Roswell's 'working' definition of affordable housing?

I understand the city will be taking on a \$2 million 108 HUD loan for the initial work on Pelfrey Pines and that the RHA will allow the city to use that property as collateral for the loan. Moreover, the City will be using the bulk of the HUD CDBG grant funds to pay back the loan. This reminds me a Peter-Paul thing, but if the Feds don't mind, I guess we'll just hope that there are no changes to the grant program over the next 10 years. However, previously, the RHA has shown itself to be beyond incompetent and I question whether it can handle this project for the immediate future, much less the next 10 years. So, my questions are these: who in the city oversees the RHA and will hold them accountable? Will it be the Grants Specialist? Is this Specialist a city employee?

Lastly, it isn't clear to me what specific work will be done in 2024. Could you clarify that? Also, specifically, what does 'site work' entail?

Thank you

Scott Gardner
12030 Brookfield Club Dr.

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Comment/Response - Donna McCoy 1 of 1

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 2:50 PM
To: 'Donna McCoy'; CDBG
Cc: Daniel Kreiss; Jeff J. Meyers; Marijo Tuttle; S. Gail Bohannon McCoy; Robert McCoy
Subject: RE: Housing

Good afternoon Ms. McCoy,

I've confirmed that Beth Brown, Councilmember Hills, and myself will be at the RHA's board meeting tomorrow at noon. Hope to see you there.

Please let me know if you have any more questions or comments.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: Donna McCoy <dmmccoy@att.net>
Sent: Friday, August 9, 2024 9:26 AM
To: CDBG <CDBG@roswellgov.com>
Cc: Daniel Kreiss <dan@roswellpres.org>; Jeff J. Meyers <jeff@roswellpres.org>; Marijo Tuttle <marijotuttle@mindspring.com>; S. Gail Bohannon McCoy <gail@grovetwaycommunitygroup.org>; Robert McCoy <rjmccoy@att.net>; Donna McCoy <dmmccoy@att.net>
Subject: Housing

EXTERNAL EMAIL

As a concerned citizen of Roswell I am writing to express my concern for the residents of Grove Way Housing. I understand you received a grant to demolish the building where many of the Senior Citizens and residents with disabilities lived. I assume you will not use the complete grant for this task of demolition. I urge you to use some of these funds to renovate housing units which are greatly in need of repairs from water leaks, mold and appliances that don't work. If the units are beyond repair then supply vouchers so the residents can move to other rent controlled apartments that provide decent accommodations. It seems that the building of new low and moderate income housing units is a long way into the future for our city. I hope that Roswell is a city that cares about all of our residents and feels it is our duty to supply housing for all levels of the economic strata.

I have worked with many of the residents of Grove Way through enrichment programs for children and older adults for the last nine or ten years through the auspices of the Roswell Presbyterian church. I can tell you there are many members of our church who have given funds and many volunteer hours to these education and

enrichment programs. We have many friends who live in this community and want the best living conditions possible for these residents of Roswell's Grove Way Community. Please consider carefully how this grant money will be spent to supply safe and healthy housing in compliance with HUD regulations for a public housing complex.

I look forward to the meeting on Tuesday at 12 pm and hope to hear about your vision for the Grove Way community. I do plan to attend.

Donna M. McCoy
465 Clubfield Drive
Roswell, GA 30075
dmmccoy@att.net
Sent from AT&T Yahoo Mail for iPad

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Comment/Response - Catharine Phillips 1 of 1

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 2:18 PM
To: 'Catharine'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: CDBG 108 loan application comment
Attachments: Catharine Phillips Section 108 Comments.pdf

Good afternoon Ms. Phillips,

All comments regarding the 2024 Annual Action Plan are being forwarded to the Executive Director at the Roswell Housing Authority and the Roswell Mayor and Council. The item has been moved to tonight's Mayor and City Council Meeting's regular agenda for further discussion. The meeting is on the 2nd floor of City Hall at 7:00 p.m.

Please let me know if you have any further questions or comments.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: Catharine <phillips1@bellsouth.net>
Sent: Monday, August 12, 2024 9:42 AM
To: CDBG <CDBG@roswellgov.com>
Subject: CDBG 108 loan application comment

EXTERNAL EMAIL

Catharine S. Phillips

These are my comments in regard to the city of Roswell's 2024 Annual Action Plan as it relates to the Roswell Housing Authority (Community Development Block Grant program 108 Loan application, 199 Grove Way)

After becoming aware of the living conditions for some of the tenants of the Roswell Housing Authority at a city council meeting on July 29, 2024 and subsequent conversations with additional residents I ask why money is not directed to the improvement of these conditions?

In the introduction of the city's Annual Plan it states these grants (CDBG) are allocated to "... providing decent housing, a suitable living environment...". The plan goes on by citing the city's first goal is to "Improve...quality of of affordable housing...". I will not argue that clearing blighted areas of land will improve living conditions outside the resident's homes; what most affects them, is the inside.

Residents report that mold exists in their homes, that appliances do not work, their units are structurally unsound and that water quality is an issue. The residents have documented their requests for assistance and they report that they have not been resolved. The city council says it is not their role to fix these problems.

I also question why you would take funds that might be used to alleviate their complaints to repay a loan that cannot be used to improve their situation.

I am submitting these comments in an attempt to bring attention to the needs of the current residents. They should be addressed even if the future state of these units is not guaranteed. Funds should be directed to resolving the current problems existing in the units at the Roswell Housing Authority.

Catharine Phillips
240 Oak Leaf Circle
Roswell, GA. 30075

Comment/Response - Jean Rearick 1 of 3

Charles Alford

From: Charles Alford
Sent: Wednesday, August 7, 2024 1:25 PM
To: 'j2rearick@gmail.com'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: CDBG Questions

Good afternoon Jean,

The City scheduled a public hearing for the [Draft Section 108 Application](#) on Monday 8/19 at 5:30 p.m. in room 220 of City Hall. Since the 108 Application is the main component of the 2024 AAP and the window for the AAP submission was so tight (deadline to HUD is 8/16), we opted to hold a public hearing specifically to discuss the draft loan application. Note: There's also a separate HUD-required public comment period for the loan application that is open until 8/26, but all the feedback from both comment periods will be submitted to HUD.

The agenda for the 8/16 M&CC Meeting and the 2024 AAP resolution should be published Thursday or Friday of this week. We also plan to present a resolution to submit the Section 108 Loan Application at the 9/9 M&CC Meeting, and then submit the application later in September.

In regards to other sources of funding, the RHA started discussions with the City about the LIHTC financing gap in late 2022. Unlike with the City's commitment to the Veranda LIHTC project, there weren't any remaining infrastructure improvements (waterlines, roads, etc.) that the City could contribute in lieu of cash. Thus most of the internal funding options, aside from cutting the RHA a check, were off the table.

The Grants Division was tasked with looking for external funding sources that could fill the gap but minimize the burden to Roswell residents. As you might imagine, our searches for affordable housing grants led us back to HUD. The RHA's situation didn't qualify for most of them, but the City's CDBG and HOME funds were deemed viable. The hurdle with those sources was that we could only access about \$400K/year, and the RHA needed the full funding upfront, so the only remaining HUD option was the Section 108 Loan Program. The RHA also requested a federal earmark in early 2023, which may have alleviated the need for the Section 108 Loan, but that request was not approved.

As far as I know, most of these discussions happened in meetings, so I'm not sure what kind of documentation there would be for a FOIA request. However, after you review, just let me know if there is something more specific you're looking for, and I can better determine how to find it.

Hope to see you on 8/19.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: Jean R <j2rearick@gmail.com>
Sent: Tuesday, August 6, 2024 10:49 AM
To: Charles Alford <calford@roswellgov.com>; CDBG <CDBG@roswellgov.com>
Subject: CDBG Questions

EXTERNAL EMAIL

Good morning Charles,

I am writing to you with questions about the draft CDBG 2024 Annual Action Plan (AAP) and draft Section 108 Loan Application. I didn't see an opportunity for the public to meet face-to-face with staff to ask questions. Is that correct? Is it a correct statement, to say that the only public meeting will be at Monday's City Council Meeting? When will the agenda be finalized and published so that the public will know if there will be early or later on during the meeting.

My main question is: what other sources of internal or external funding were considered to cover the \$2 million from the City towards the LIHTC application? When and where were they considered? What documentation of the consideration exists? Will I need to file a FOIA request to get this information?

Thank you,

Jean

Jean Rearick

"Next to the Blessed Sacrament itself, your neighbor is the holiest object presented to your senses." C.S. Lewis

Comment/Response - Jean Rearick 2 of 3

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 11:33 AM
To: 'Jean R'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: CDBG Questions
Attachments: GRANTS Admin Fin Comm Presentation 7-9-24.pptx

Hey Jean,

You're sending these in faster than I can reply to them☺

Attached is the presentation from the 7/9 Admin-Finance-R&P Committee. The last page has the estimated schedule that the City is currently using (we were off by a day). I think the confusion is coming from the multiple HUD-required comment periods and the public notices. Ideally, we would've run the public review for both documents at the same time, but we were still working on the Section 108 app, and I wasn't confident we could have an accurate draft posted for public review by 7/12. But 7/12 was the latest we could post the AAP for a 30-day review and still get an M&CC resolution before submitting it on 8/16, thus we opened the AAP comment period on 7/12 and opened the Section 108 comment period the following week on 7/25.

We did explore potential uses of the leftover CDBG-CV funds for the RHA, but the narrow focus of the funding parameters, "prevention of, preparation for, or response to the coronavirus pandemic" didn't fit any of their projects. There may be an opportunity to reallocate some of the prior-year CDBG (regular) funds from the 199 Grove Way demo. The contract is under budget right now, but we're maintaining the initial CDBG commitment until the work is done just in case there are overages. I'm not sure which units/activities are the highest priority for remediation, but if the units are part of the Phase II redevelopment plans, that may impact the eligibility. However, I'm forwarding all comments to the RHA and M&CC.

In regards to a meeting with the RHA residents, I did speak with Beth Brown over at the RHA. She mentioned that they did meet with one of the residents that spoke at the open forum, and she felt like there was a resolution. I also know the RHA has a board meeting tomorrow 8/13, which some people have inquired about because it's partly open to the public. Beth, Councilmember Hills, and myself will be there to answer questions. It's in room 220 at noon.

Let me know if you have any other questions.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: Jean R <j2rearick@gmail.com>
Sent: Friday, August 9, 2024 10:47 AM

To: Charles Alford <calford@roswellgov.com>

Subject: Re: CDBG Questions

EXTERNAL EMAIL

Thank you Charles for your quick reply. Did the timeline has changed from 8/12 to 8/19. What day was that change made? Was there any consideration of using the leftover cdbg-cv funds towards RHA instead of recreation programs? Or reallocating any left over cdbg funds from previous years?

Please don't forget that the current residents of RHA are also Roswell residents and they deserve to live in habitable conditions. I have been in many of the units and have first hand seen how bad the conditions are.

Do you know whether anything has been scheduled to confer with the RHA residents as suggested during the M&C meeting on August 29th? Or do I need to write Councilperson Hills to ask this question?

Have a blessed day,
Jean

"Charity is the Samaritan who pours oil on the wounds of the traveler who has been attacked. But it is justice's role to prevent the attacks." —Blessed Frédéric Ozanam, Founder of The Society of St. Vincent de Paul.

On Wed, Aug 7, 2024 at 1:24 PM Charles Alford <calford@roswellgov.com> wrote:

Good afternoon Jean,

The City scheduled a public hearing for the [Draft Section 108 Application](#) on Monday 8/19 at 5:30 p.m. in room 220 of City Hall. Since the 108 Application is the main component of the 2024 AAP and the window for the AAP submission was so tight (deadline to HUD is 8/16), we opted to hold a public hearing specifically to discuss the draft loan application. Note: There's also a separate HUD-required public comment period for the loan application that is open until 8/26, but all the feedback from both comment periods will be submitted to HUD.

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The Grants Division was tasked with looking for external funding sources that could fill the gap but minimize the burden to Roswell residents. As you might imagine, our searches for affordable housing grants led us back to HUD. The RHA's situation didn't qualify for most of them, but the City's CDBG and HOME funds were deemed viable. The hurdle with those sources was that we could only access about \$400K/year, and the RHA needed the full funding upfront, so the only remaining HUD option was the Section 108 Loan Program. The RHA also requested a federal earmark in early 2023, which may have alleviated the need for the Section 108 Loan, but that request was not approved.

As far as I know, most of these discussions happened in meetings, so I'm not sure what kind of documentation there would be for a FOIA request. However, after you review, just let me know if there is something more specific you're looking for, and I can better determine how to find it.

Hope to see you on 8/19.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellga.gov

From: Jean R <j2rearick@gmail.com>
Sent: Tuesday, August 6, 2024 10:49 AM
To: Charles Alford <calford@roswellgov.com>; CDBG <CDBG@roswellgov.com>
Subject: CDBG Questions

EXTERNAL EMAIL

Good morning Charles,

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Jean Rearick

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Administration Finance Committee July 9, 2024



Section 108 Loan Program

- Allows City to borrow up to five times its annual CDBG allocation
 - 2024 allocation is \$407,830
 - Max loan is \$2,039,150
- Low rate based on Treasury Auction Bill Rates
 - Currently 5.58% + 1.64% origination fee
- 10 year loan period
- Pay back with CDBG funds
- 125% collateral



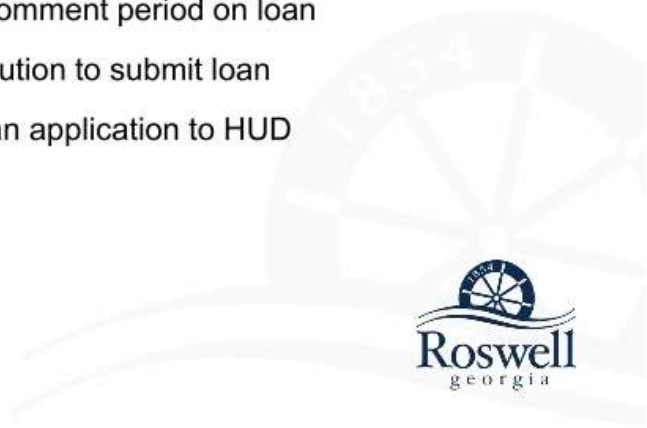
Section 108 Loan Program (continued)

- Staff recommends submitting loan application
 - Max amount \$2,039,150 and 10-year period
 - Fulfills MCC pledge to support the RHA's redevelopment
 - RHA is identifying property for collateral
- Approval takes 90-180 days
- City would begin paying off the loan with 2024 CDBG
 - \$326,264 (80%) towards loan
 - \$81,566 (20%) for administration/planning
- Pay off with future annual CDBG (about 7-8 years)



Section 108 and AAP Timing

- July 11 – Open 30-day public comment period on AAP
- July 25 – Open 30-day public comment period on loan
- August 12 – Close AAP public comment/MCC Resolution
- August 16 – Submit AAP to HUD
- August 26 – Close public comment period on loan
- September 9 – MCC Resolution to submit loan
- September 16 – Submit loan application to HUD



Comment/Response - Jean Rearick 3 of 3

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 2:05 PM
To: 'Jean R'
Cc: CDBG (CDBG@roswellgov.com)
Subject: RE: Conflicts between the 2023 CAPER draft and the 2024 CDBG AAP draft and Section 108 Application draft.

Hey Jean,

This was my mistake and my misunderstanding of the gap financing discussions. It was in reference to a potential real estate transaction that never came to fruition, and it shouldn't have been included in the CAPER.

Thanks,



Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

From: Jean R <j2rearick@gmail.com>
Sent: Sunday, August 11, 2024 12:15 PM
To: Charles Alford <calford@roswellgov.com>
Subject: Conflicts between the 2023 CAPER draft and the 2024 CDBG AAP draft and Section 108 Application draft.

EXTERNAL EMAIL

Good day Charles,

Can you please clarify what I perceive as an unintentional conflict between the 2023 CAPER draft and the 2024 CDBG AAP draft and Section 108 Application draft?

The 2023 CAPER draft gives me the impression that the City is pledging \$2 Million and is requesting an additional \$2 million Section 108 Loan to benefit RHA's LIHTC. Thereby contributing a total of \$4 million towards the redevelopment of Pelfrey Pines. I highlighted the words that give this impression.

- "Along with potentially using its subsequent annual CDBG awards to guarantee a Section 108 for the RHA, the City **also** pledged another \$2 million in local support." *2023 CAPER 9*
- "The City addressed its second impediment by pledging over \$2 million in support for the RHA's redevelop efforts **and** is considering the possibility of applying for another \$2 million through a Section 108 loan in 2024." *2023 CAPER 11*

However, the CDBG AAP and Section 108 Application drafts, give me another impression that the City made a \$2 Million pledge on behalf of all Roswellians (rich, poor, moderate-income); but has decided to solely use federal entitlement funds earmarked to help communities provide decent housing and a suitable living environment, principally for low- and moderate-income (LMI) persons to cover their \$2M pledge and payback the Section 108 Loan

- " The RHA's LIHTC credit application was approved in late 2023, and it plans to close on the deal in late 2024. The City is now moving forward with submitting its application for Section 108 loan funds to meet the \$2M pledge. The City's 2024 CDBG allocation is \$407,830, and this City is applying for the maximum loan amount of \$2,039,000. While CDBG funds are prohibited from being used for new construction activities, they can be used for site work in preparation of the new construction. **The City plans to pay the loan back in 7-10 years using 80% (currently \$327K) of its annual CDBG allocations starting in 2024. HUD requires additional collateral, and the RHA agreed to use its property to secure the loan.**" *Draft Roswell Section 108 Application - Page 2/3*
- " For continued support of that initiative in 2024, the City pledged its support of the RHA's Low-Income Housing Tax Credit (LIHTC) application to the Georgia Department of Community Affairs (DCA) for a Phase I redevelopment of the Pelfrey Pines site. The application was approved in October 2023 and will create 102 units of affordable housing, an increase of 62 affordable units. **The City has decided to fulfill its pledge to the RHA by applying for a Section 108 loan in the amount of \$2,039,150 through HUD, and it will use a portion of its 2024 CDBG allocation and subsequent annual CDBG allocations to pay back the loan.** *2024 CDBG AAP Executive Summary - Page 2*

Thank you in advance for helping me understand how CDBG funds, LIHTC, and the Section 108 Loan come together.

Jean

Jean Rearick

"Next to the Blessed Sacrament itself, your neighbor is the holiest object presented to your senses." C.S. Lewis

Comment/Response - Marijo Tuttle 1 of 1

Charles Alford

From: Charles Alford
Sent: Monday, August 12, 2024 2:12 PM
To: 'Marijo Tuttle'
Subject: RE: Funds from Block Grant 108

Good afternoon Ms. Tuttle,

It's my understanding that this item has been moved to the regular agenda for discussion at tonight's Mayor and City Council Meeting at 7:00 p.m. All comments have been forwarded to the Executive Director of the Roswell Housing Authority and the Roswell Mayor and City Council.

Please let me know if you have any additional comments or questions.

Thanks,

Charles Alford
Grants Specialist II
38 Hill Street, Suite 130
Roswell, GA 30075
Office: (770) 641-3847
www.roswellgov.com

-----Original Message-----

From: Marijo Tuttle <marijotuttle@mindspring.com>
Sent: Friday, August 9, 2024 8:26 PM
To: CDBG <CDBG@roswellgov.com>
Subject: Funds from Block Grant 108

EXTERNAL EMAIL

To Whom It May Concern:

As a concerned Roswell resident and a member of a Community Outreach program at Roswell Presbyterian Church, I am writing this in regards to the proposed use of funds for Block Grant 108. It is my recommendation that some of the money from the Block Grant 108 funds, which are now earmarked to demolish Pilfrey Pines, be set aside to renovate and repair several of the currently occupied apartment units of the Grove Way public housing community.

During the past 10 years, I have worked with and am friends with several of the residents of Grove Way. I have seen first hand the deplorable conditions that many apartments of the community are in. These apartments are most often in a state of disrepair. Some of the things the residents live with are: gas leaks, water leaks, severe mold, broken appliances that aren't repaired or replaced for months, the residual effects of electrical fires that aren't attended to and/or repaired, electrical sockets that don't work, heating and air conditioner units that stay in disrepair for several weeks/months, etc. The list goes on and on. If the housing authority is unable to provide adequate public housing which

is HUD compliant then I ask that they provide with vouchers so the current residents can move to other facilities that are adequately maintained.

It is my hope to live in a Roswell Community that attends not only to their more affluent citizens but also the citizens who reside in low and moderate income housing. It is my opinion that when we attend to the needs of many, we become a stronger community.

Marijo Tuttle
7770 Georgetown Chase
Roswell, GA 30075

Sent from my iPad

Roswell 2023 Citizen Participation Plan

Citizen Participation Plan
Community Development Block Grant (CDBG) Program
(Revised 4-27-23)

City of Roswell
Grants Division
38 Hill Street, Suite 130
Roswell, GA 30075
Phone: 770-641-3727

Citizen Participation Plan

Introduction

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

Applicability and Adoption of the Citizen Participation Plan

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

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

- Citizen Participation Plan and amendments to the Citizen Participation Plan;
- A Five-Year Consolidated Plan (Con Plan);
- An Annual Action Plan (AAP);
- Analysis of Impediments (AI);
- Consolidated Annual Performance Evaluation Report (CAPER); and
- Substantial Amendments to the Consolidated Plan or Annual Action Plan.

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

Consolidated Plan/Annual Action Plan

Based on population, the City of Roswell is considered an entitlement community. The CDBG entitlement program allocates annual grants to assist in the development of viable communities by providing decent housing, a suitable living environment, and to expand economic opportunities, principally for low and moderate income persons. To receive an annual allocation of federal funds from HUD, the City is required to create a five-year Consolidated Plan (strategic plan) with a one-year Action Plan. Subsequently, the five-year Plan will be updated with Annual Action Plans for years two through five. The Consolidated Plan includes the amount of assistance City expects to receive and the range of activities that may be undertaken including the estimated benefit to persons of low- and moderate-income. The

Annual Action Plans are required to include project or program specifics, such as, location, cost, proposed outcome, and any additional descriptive information. Primarily, federal regulations require that funds be aimed where the greatest benefit may be attained for low- and moderate-income residents.

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

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

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

Public Meetings/Input	Date
Presentation at Administration, Finance, and Recreation & Parks Committee ¹	5-9-23
Publicize draft of CPP, AI, Con Plan, and AAP; and open public comment period	5-18-23
Public Hearing at City Hall to discuss drafts ²	6-6-23
Close public comment period	6-19-23
Adopt plans at the Mayor and City Council Meeting ³	7-10-23
Submit plans to HUD	7-17-23

¹This hearing will be held at City Hall in room 220 at 5:00 p.m.

²This meeting will be held at City Hall in room 220 at 5:30 p.m.

³This meeting will be held in the City Hall Council Chambers at 7:00 p.m.

Plan Amendments

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

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

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

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

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

Performance Reports

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

Access to Information and Public Involvement

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

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

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

City of Roswell Grants Division
38 Hill Street, Suite 130
Roswell, GA 30075

Roswell Housing Authority
199 Grove Way
Roswell, GA 30075

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

Roswell Public Library
115 Norcross Street
Roswell, GA 30075

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

Communication Accommodations

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

Public notice will be posted at least 15 days before a public hearing in the Alpharetta-Roswell Herald and on the City's website at www.roswellgov.com/cdbg. Citizens who may require this information in alternative formats may contact the CDBG Program at 770-641-3727 at least five working days prior to the public hearing date to permit the department to make arrangements to have translation services available for the public hearing(s) in question.

Displacement

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

Technical Assistance

Technical assistance may be requested in writing by any persons of low- and moderate-income or groups representing such persons as it relates to developing proposals for funding assistance under any program outlined by the Consolidated Plan. The level and type of assistance needed

will be determined by the City of Roswell. All technical assistance requests should be addressed to:

City of Roswell
Grants Division
38 Hill Street, Suite 130
Roswell, Georgia 30075

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

Complaint Procedure

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

City of Roswell
Grants Division
38 Hill St., Suite 130
Roswell, Georgia 30075

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

Grantee SF-424's and Certification(s)

Docusign Envelope ID: B64CFA31-0FBD-439A-BA5B-D511F2083DCD

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="08/16/2024"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Roswell"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="58-6000655"/>	* c. UEI: <input type="text" value="MGYQDQ3HF323"/>	
d. Address:		
* Street1: <input type="text" value="38 Hill Street"/> Street2: <input type="text"/> * City: <input type="text" value="Roswell"/> County/Parish: <input type="text"/> * State: <input type="text" value="GA: Georgia"/> Province: <input type="text"/> * Country: <input type="text" value="USA: UNITED STATES"/> * Zip / Postal Code: <input type="text" value="30075-4537"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Finance"/>	Division Name: <input type="text" value="Grants"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Charles"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Alford"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Grants Specialist II"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="770-641-3847"/> Fax Number: <input type="text"/>		
* Email: <input type="text" value="calford@roswellgov.com"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <p><input type="text" value="City or Township Government"/></p> <p>Type of Applicant 2: Select Applicant Type:</p> <p><input type="text"/></p> <p>Type of Applicant 3: Select Applicant Type:</p> <p><input type="text"/></p> <p>* Other (specify):</p> <p><input type="text"/></p>	
<p>* 10. Name of Federal Agency:</p> <p><input type="text" value="United States Department of Housing and Urban Development"/></p>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <p><input type="text" value="14.218"/></p> <p>CFDA Title:</p> <p><input type="text" value="Community Development Block Grant/Entitlement Grant"/></p>	
<p>* 12. Funding Opportunity Number:</p> <p><input type="text" value="B-24-MC-13-0018"/></p> <p>* Title:</p> <p><input type="text" value="Community Development Block Grant (CDBG) Program"/></p>	
<p>13. Competition Identification Number:</p> <p><input type="text"/></p> <p>Title:</p> <p><input type="text"/></p>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <p><input type="text"/></p> <p><input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/></p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <p><input type="text" value="City of Roswell - 2024 Community Development Block Grant (CDBG) Program"/></p>	
<p>Attach supporting documents as specified in agency instructions.</p> <p><input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/></p>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="GA-006"/>	* b. Program/Project: <input type="text" value="GA-006"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="01/01/2024"/>	* b. End Date: <input type="text" value="12/31/2024"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="407,830.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="407,830.00"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Randy"/>
Middle Name: <input type="text" value="D"/>	
* Last Name: <input type="text" value="Knighton"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Administrator"/>	
* Telephone Number: <input type="text" value="770-554-6265"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="rknighton@roswellgov.com"/>	
* Signature of Authorized Representative:	* Date Signed: <input type="text" value="8/16/2024"/>
<div style="border: 1px solid black; padding: 5px; display: inline-block;"> Digitally signed by: <i>Randy Knighton</i> DN: cn=Randy Knighton, o=City of Roswell, ou=City of Roswell, email=rknighton@roswellgov.com, c=US </div>	

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

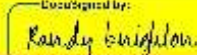
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
<div style="border: 1px solid black; padding: 5px;"> <small>DocuSigned by:</small>  <small>Randy Knighton</small> </div>	<div style="border: 1px solid black; padding: 5px;">City Administrator</div>
APPLICANT ORGANIZATION	DATE SUBMITTED
<div style="border: 1px solid black; padding: 5px;">City of Roswell</div>	<div style="border: 1px solid black; padding: 5px;">8/16/2024</div>

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ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

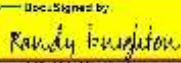
1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<p>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</p> <p>DocuSigned by:  Randy Insiguiton</p>	<p>TITLE</p> <p>City Administrator</p>
<p>APPLICANT ORGANIZATION</p> <p>City of Roswell</p>	<p>DATE SUBMITTED</p> <p>8/16/2024</p>

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CERTIFICATIONS

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

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

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

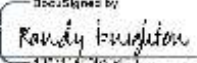
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

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

DocuSigned by

Signature of Authorized Official

8/16/2024

Date

City Administrator
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

<div>DocuSigned by:  _____ Signature of Authorized Official</div>	<div>8/16/2024 _____ Date</div>
--	---

City Administrator

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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