Seventh Program Year CAPER-2010

GENERAL

Executive Summary

Funding Year 7 CAPER Executive Summary response:

The City of Cuyahoga Falls Community Development Block Grant (CDBG) Program was very successful in Funding Year 7 (2010). The funding year began on July 1, 2010 and was completed on June 30, 2011.

- All CDBG funds were administered responsibly and resulted in benefiting low and moderate income persons in the City.
- CDBG funds were spent in a timely fashion along with previous years' unexpended housing activity funds.
- Administrative costs were less than the 20 percent limit and there were no public service expenditures.
- Program income did not exceed the recommended $25,000 differential.
- One hundred percent of non-administrative activities provided benefits meeting the low to moderate national objective.

The City of Cuyahoga Falls was successful in meeting the goals for FY 2010. As stated, there was unexpended funds remaining from the previous year for housing activities, which we utilized for our very popular matching grant program, thereby exceeding the housing activities goal.

2010 Housing Activities at a Glance			
Activity	**Goal**	**Accomplishment**	**% of Goal**
Emergency Grants/Rehab Loans	5	5/7	140%
Matching Grants	5	37	740%
Paint Reimbursements	8	14	175%
Down Payment Assistance	5	4	80%

General Questions

1. *Assessment of the one-year goals and objectives:*
   a. *Describe the accomplishments in attaining the goals and objectives for the reporting period.*
   b. *Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.*
   c. *If applicable, explain why progress was not made towards meeting the goals and objectives.*
2. *Describe the manner in which the recipient would change its program as a result of its experiences.*
3. *Affirmatively Furthering Fair Housing:*
   a. *Provide a summary of impediments to fair housing choice.*

b. Identify actions taken to overcome effects of impediments identified.

4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.

5. Leveraging Resources

a. Identify progress in obtaining "other" public and private resources to address needs.

b. How Federal resources from HUD leveraged other public and private resources.

c. How matching requirements were satisfied.

Funding Year 7 CAPER General Questions response:

1. Goals and Objectives

a. The following description includes the accomplishments in attaining the goals and objectives for FY 2010. The National Objectives key and corresponding abbreviations will be used.

National Objective	Abbreviation
Low-Moderate Housing	LMH
Low-Moderate Clients	LMC
Low-Moderate Areas	LMA
Low-Moderate Jobs	LMJ

Housing Activities: During FY2010, funds were expended for housing rehabilitation loans, emergency grants, matching grants, down payment assistance and paint reimbursements. A total of $453,878.97 was committed to homeowners but only $422,193.07 has been drawn down by the end of the program year for these programs utilizing unexpended housing activity funds from the previous year along with current year funds (see PR06 attachment). The goals of the Housing Activities Program for Year 7 were to assist with the completion of 5 emergency repair grants, 8 rehabilitation projects, 5 matching grants, 5 down payment assistance loans and 8 paint reimbursement grants to income qualified homeowners.

Housing Rehabilitation Loans/Emergency Grants: This activity provides 0% deferred and 3% loans to LMI homeowners who have resided in their home for 2 years. Homeowners in the extremely low and very low income levels qualify for the 0% deferred loan; whereas the low income level qualifies for the 3% loan. In addition to abating substandard housing conditions, all households in this program must participate in the City's Project Partner program as part of the project scope. Pursuant to Ordinance 142-2004, Project Partner is a free inspection program that allows the City to evaluate the condition of the gutters and downspouts, drain connections, sump pumps, along with the televising of sanitary sewer laterals for infiltration of storm water. The purpose is to prevent storm water from entering the sanitary sewer, which may cause a back up into the homes of our residents. If the home fails the inspection, the remediation is included in the rehabilitation program. The maximum loan amount is $25,000. The Emergency Grant provides assistance to LMI households for a condition, which poses an immediate or serious threat to

the health, welfare and/or safety of the occupants of an eligible household. This program has been extremely active since many of households are upside down with their mortgages and unable to secure additional financing to provide for emergency repairs. The maximum grant amount is $5,000.

National Objective: LMH
Specific Objective: Provide decent, affordable housing.
Proposed Outcome: Availability/accessibility.
Goal: Assist 5 households.

Accomplishment: 5 households were assisted with emergency grants for a total of $12,277.15. 8 households were assisted with rehabilitation loans for a total of $98,311.00 including $5,180.00 of Department of Energy funds.

Residential Matching Grants: This activity provides a matching grant to LMI households making qualified improvements to their homes such as a major renovation; upgrading electric, plumbing, or making energy efficiency improvements such as HVAC systems, new windows, etc. The homeowner pays the first 50% of the costs and the program provides matching funds up to $10,000.

National Objective: LMH
Specific Objective: Provide decent, affordable housing.
Proposed Outcome: Availability/accessibility.
Goal: Assist 5 households.

Accomplishment: 37 households were assisted for a total of $279,280.76.

Paint Reimbursement Program: This activity provides a $300 reimbursement grant to LMI households for exterior paint and minor painting supplies. It is an alternative for our qualified residents to be able to maintain their homes.

National Objective: LMH
Specific Objective: Provide decent, affordable housing.
Proposed Outcome: Availability/accessibility.
Goal: Assist 8 households.

Accomplishment: 14 households were assisted for a total of $3,475.86.

Down Payment Assistance: This activity provides a down payment assistance loan forgiven in 5 years to first time LMI homebuyers. Each applicant must complete 8 hours of HUD-certified pre-homebuyer counseling.

National Objective: LMH
Specific Objective: Provide decent, affordable housing.
Proposed Outcome: Availability/accessibility.
Goal: Assist 5 households.

Accomplishment: 4 households were assisted for a total of $12,000. Two additional households withdrew their application due to the 30% cost burden restriction.

Infrastructure:

Prospect Street Extension - The City began a 2-year project in 2008 that will extend Prospect Avenue from Front Street to Second Street. The new street will provide public access to a new urban park along a National Heritage River. This project is based on the 2005 Cuyahoga River Corridor Brownfield Area Master Plan. The plan states that this street will allow the largest block in the Brownfield District to be broken into two walkable blocks allowing access to the High Bridge Glens Park and the Watermark mixed-use center. In addition to being the largest block in the Brownfield District, this project is located in Census Tract 5202.02 Block Group 1 having an 85.9% low mod population. The design and engineering was completed in FY 2009 with bid documents prepared. This project is being coordinated with the private development, Watermark, which was delayed by OHFA. Construction started in Spring of 2011. Due to numerous weather delays, the project was not fully complete at the end of the program year, however, it will be complete by the end of the summer of 2011.

National Objective:	LMA
Specific Objective:	Improve quality of public improvements for LMI
Proposed Outcome:	Availability/accessibility.
Goal:	Accessibility to a new public park in a LMI Census block.

Accomplishment: The accessibility to the new park, the soon to be opened retail space in the Watermark (a mixed use building), and other local restaurants make this project an important asset for the residents of this LMI census block. Total funds expended to date are $607,570.25.

Niki's Walk – The City of Cuyahoga Falls received a $2.18M CORF grant from the State of Ohio for brownfield remediation. Once the brownfield is cleaned, a senior housing complex is scheduled to be constructed. The City has committed CDBG funds in the amount of $80,000 (over a 2-year period) towards the infrastructure. It is anticipated the CDBG portion of the project costs will be .015% in a LMI census block – 5329.00-1

National Objective:	LMA
Specific Objective:	Provide decent affordable housing
Proposed Outcome:	Availability/accessibility.
Goal:	Provide approximately 165 affordable housing Units

Accomplishment: When completed, it will be affordable housing. Total funds expended to date are $31,897.50.

Portage Crossing - This is a $57M project creating a new neighborhood market place in a LMI census block – 5203.00-5. CDBG funds will be used to assist with the infrastructure improvements or .005% of the project costs. Infrastructure costs for entire project are estimated at $9,730,866 without costs for new electric substation. Due to the current economic environment, it is taking longer to get leases signed; thus the developer has not started the infrastructure improvements by the close of the program year.

National Objective:	LMJ
Specific Objective:	Create economic opportunities with new jobs

Proposed Outcome: Availability/accessibility.
Goal: Create approximately 26 new jobs for LMI residents.

Accomplishment: No funds expended to date.

Stone Street Improvement - The City began the design and engineering of a 3-year infrastructure project that will include the reconstruction of Stone Street from Broadway East to Munroe Falls Avenue. Improvements will include placing new underground utilities, road surface and sidewalks on Stone Street. This project is located in an area where 15% of the persons are below the poverty level and low to moderate income census blocks, 5201.01-6 and 5201.01-1.

National Objective: LMA
Specific Objective: Create a suitable living environment
Proposed Outcome: Availability/accessibility.
Goal: Provide an improved living environment with sidewalks and proper storm drainage.

Accomplishment: An improvement living environment and quality of life for the residents of a LMI area. Total funds expended to date are $11,529.49.

Spot Slum & Blight

1110-1130 Portage Trail - After a long and tedious process with the Summit County Court of Common Pleas, the City acquired the property on April 7, 2011 for $12,500 of CDBG funds. The property was vacant and abandoned along with having been officially condemned by the Chief Building Official on March 5, 2009 with a demolition order issued. The City of Cuyahoga Falls received CDBG-R funds for the demolition. In preparing for the demolition, it was determined the property was a Brownfield and was remediated utilizing State of Ohio Clean Ohio Assistance Funds (COAF) in the amount of $155,250. CDBG-R funds in the amount of $48,475 were used to demolish the building. The contractor demolishing the structure retained two jobs. The City sent out a Request for Proposal to fifteen potential developers and only received one proposal by the deadline. Now the cleaned and vacant property, which is located on a major arterial located in a low/mod area - Census Block 5203.00-5, is available for redevelopment

National Objective: SBS
Specific Objective: Demolition of a condemned structure
Proposed Outcome: Availability/accessibility.
Goal: Create approximately 8 new jobs when redevelopment is complete.

Accomplishment: Economic opportunity for redevelopment with job creation. Funds expended to date are $12,500 of CDBG and $48,475 of CDBG-R.

2355 Front Street – This property, a former car dealership in the City's downtown district, was also vacant and abandoned. Having been the site of many police, fire and code enforcement issues, the Building Official condemned the structure on June 28, 2010. The building was razed on October 13, 2010 and a tax

assessment for the demolition costs placed on the property. The property has been acquired by a neighboring property owner and the assessment paid.

National Objective:	SBS
Specific Objective:	Demolition of a condemned structure
Proposed Outcome:	Availability/accessibility.
Goal:	Elimination of a blighted structure in the city's downtown district

Accomplishment: Economic opportunity for redevelopment along with elimination of blight. Funds expended $19,000 and repaid.

Economic Development Revolving Loan Program: This program provides loans to businesses to create jobs; one FTE for every $35,000 loaned or part thereof. Three applications pending at the conclusion of funding year 2009 and were approved in funding year 2010 with a job requirement of 6.5 LMI jobs during the next 18 months.

A loan of $140,000 to Advanced Cryogenic Enterprises LLC for the purchase of a badly needed piece of equipment to pulverize sodium carbonate, job creation requirement of 4 LMI jobs by March 30, 2012. As of 6/30/11, 3 LMI jobs have been created.

A loan of $50,000 to Bark at Home LLC was used for start up costs as a companion business to a very popular doggie daycare, Camp Bow Wow. Bark at Home provides in-home pet care. The job creation requirement is 2 LMI jobs by April 1, 2012. As of 6/30/11, 1 LMI job as been created.

A forgivable loan of $5,000 to AG PrintPromo, an MBE business, was used for moving and set up costs associated with relocating from rental space in the city to a building the company purchased. The job creation requirement was a .5 LMI job. As of 5/2/11, 2 PT's had been hired to equal 1 FTE.

National Objective:	LMJ
Specific Objective:	Economic Opportunity
Proposed Outcome:	Availability/accessibility.
Goal:	4 jobs

Accomplishment: At the end of FY 2010, 5 FTE jobs have been created with 2 additional required.

2. Changes to Program

All programs have been successful and the City is satisfied with the results. Continued marketing efforts will be conducted to keep the public aware of the availability of program funds. The operating procedures currently in place have worked well and will be continued.

3. Affirmatively Furthering Fair Housing

a. A 2010 Analysis of Impediments was completed by Donald B. Eager & Associates and submitted to Director Carolyn Murphy, Columbus Fair Housing Center on February 17, 2011 in an electronic version as well as a hard copy. Lack of awareness of fair housing provisions and poor credit history remain factors in

limiting housing choice. The economy in Ohio and high unemployment continues to restrict housing choice for many.

b. The Fair Housing Program in Cuyahoga Falls is administered by Donald B. Eager & Associates. During FY 2010 (7/1/10 – 6/30/11), the firm responded to 191 telephone calls as compared to 229 in the previous year.

- 75 calls of a general nature concerning housing
- 77 calls regarding housing repairs
- 6 calls regarding eviction
- 1 call regarding foreclosure
- 6 calls on lack of heat
- 9 calls regarding bedbugs
- 17 calls regarding miscellaneous topics

In addition, Mr. Eager assisted with a total of 7 education programs. There were 2 Realtor Fair Housing CEU training sessions, 2 landlord information sessions, and 3 tenant clinics to increase the public's awareness of the need for affordable and fair housing.

A copy of the 2011 Fair Housing Action Plan is attached.

4. Underserved Needs

The major obstacle to addressing housing needs, as in the past, continues to be the lack of adequate funding. As our Housing Needs Table indicates, there is a need for affordable housing. If there were additional funding, we would be able to partner with the private developers on a much higher level. The Consolidated Plan continues to identify the improvement of the quality of older neighborhoods by upgrading existing housing, encouragement of new housing, assisting neighborhood businesses, and the coordination of capital improvements in Cuyahoga Falls.

Our housing activities are offered citywide to address underserved needs. We offer tax incentives in the Cuyahoga River Area to encourage new private investment in the form of improvements to existing housing and new housing. This area of the community contains the oldest neighborhoods. This area also has the lowest income residents in the City. Most of the improvements made the last few years have not qualified for the tax incentives as they were code enforcement required improvements.

5. Leveraging Resources

The City of Cuyahoga Falls received a grant from the Department of Energy (DOE) in the amount of $468,400. Aside from other activities, $5,180 was combined with CDBG Rehab loan funds to make energy efficient improvements for a LMI resident in the form of a 3% loans. Also, a commercial loan in the amount of $96,400 was made for energy efficient improvements to an existing 120-unit affordable multi-family structure. The City of Cuyahoga Falls continues to research and apply for additional funding of various kinds in order to leverage our funding sources.

The Matching Grant in our Housing Activities Program requires a 50% match of private funds. The LMI residents of our city work hard to save money to make repairs or improvements to their homes since most are upside down with their mortgages due to the devaluation of the housing market. This program provides them with the opportunity to extend their funds. LMI homeowners expended $287,299.98 while

$279,280.76 of CDBG funds was matched for an average of $7,548.13 in improvements to the participating LMI households.

Managing the Process

1. *Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.*

Funding Year 7 CAPER Managing the Process response:

The priorities, strategies and programs carried out through the Consolidated Plan are consistent with all City plans as well as adhere to all applicable statutes and federal regulations. The CDBG staff has implemented internal procedures to ensure compliance with program regulations. Prior to receiving Board of Control approval for each expenditure, all CDBG-funded projects are reviewed to meet eligibility and national objective criteria in addition to meeting all environmental requirements.

The City prepares and submits all required documents and/or reports making them available for public comment. Program activity is measured on a monthly basis.

The Akron/Summit County Continuum of Care continues to address homelessness issues in Summit County. The Continuum of Care is a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness.

To ensure sufficient funds will be expended to meet the performance standard each program year, the City has implemented a detailed IDIS draw schedule. A draw schedule will be developed every program year to ensure the City meets all timeliness tests. The City strives to complete one draw per month. Prior to submittal of the draw request, the CDBG staff works with the Finance staff to ensure its accuracy.

The Consolidated Plan and Annual Action Plan activities are selected from the City of Cuyahoga Falls Development Plan based on priority, need, and low-moderate rate qualifications.

Citizen Participation

1. *Provide a summary of citizen comments.*
2. *In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.*

Funding Year 7 CAPER Citizen Participation response:

1. The City of Cuyahoga Falls has held all public meetings in accordance with the Citizen Participation Plan. The following legal notice was printed in the Falls News Press on Sunday, August 14, 2011 and the CAPER was made available on the City's website for comments. The public comment period was held from September 2, 2011 through September 23, 2011. IDIS reports CO4PR03, CO4PR06, CO4PR10, CO4PR23 and CO4PR26

are part of the CAPER and were made available to the public during the public comment period.

RecordPub: Classifieds Finder

Home » Legals » Legals » 19731314

PUBLIC NOTICE City of Cuyahoga Falls Community Development Block Grant (CDBG) Program The City of Cuyahoga Falls Consolidated Annual Performance Evaluation Report (CAPER) for the period ending June 30, 2011 will be filed with the U.S. Department of Housing and Urban Development, Regional Office, Columbus, Ohio, on September 28, 2011. The report provides a description of progress on planned activities and program requirements in compliance with Sections 570.507 and 92.550 of the CDBG Federal Regulations for the Program. A copy of the this report is available for review and comments during normal working hours from September 2 through September 23, 2011 at the Department of Community Development, Municipal Building, 2310 Second Street, Cuyahoga Falls, OH. It can also be accessed on the City of Cuyahoga Falls website at www.cityofcf.com. EEO August 14 - 11182895

NO COMMENTS WERE RECEIVED.

2. Other federal funding received was CDBG-R funds in the amount of $189,270 and NSP funds from the Department of Development in the amount of $783,204. The CDBG-R funds were committed to two projects as previously explained. The SBS project has been completed and the remaining funds ($8,305) were reallocated to the Watermark project that has senior housing as a major component, thus have approximately 74% of the CDBG-R funds used for a LMI project. As required, all NSP funds were fully obligated and under contract by June 15, 2010.

A substantial plan amendment was submitted for additional funds previously unidentified as program income from old rehabilitation loan repayments in the amount of $624,248.61. The amendment was published for public comment from June 6, 2010 to July 6, 2010. The legislation was introduced at City Council on June 26, 2010 with a public hearing on July 6, 2010 and approved on July 12, 2010. It was submitted to HUD on July 15, 2010. Inasmuch as the plan amendment was not approved before June 30, 2010, it was not entered into IDIS as instructed by our HUD representative. The PR09 indicates funds were entered into IDIS as program income and revolving loan funds on 9/24/10 during program year 2010 for FY2009. Due to an oversight, the program income designated in the legislation for economic development was missed for entry but has since been corrected and is so noted on line 07 of the PR26 Report.

The City's CDBG-funded activities benefiting the LMI residents were carried out citywide. There are three LMA projects underway, Prospect Street Extension/Watermark, which is located in 5202.02-1 census block with a 85.9% LMI rate; Niki's Walk (nka Patrick's Walk) located in 5329.00-1 with a 49.8% LMI rate; and Stone Street Improvement located in 5201.01-6 and 5201.01-1 with 54% and 47.7% LMI rates respectively. Cuyahoga Falls does not have any census tract concentrations of minorities. A map showing the locations of expenditures is an attachment.

CDBG funds for 2010 were as follows:

2010 CDBG Entitlement Grant	$ 765,390.00
Unexpended Prior Year Funds	$ 86,798.82
Available Revolving Loan Funds	$ 233,240.24
Program Income Used	$ 350,043.75
Total Funds Available for 2010	$1,435,472.81
Project Expenses for 2010 (from PR06)	
Housing Activities	$ 422,193.07
Infrastructure Activities	$ 305,326.76

Economic Development Activities	$ 226,500.00
Administration/Planning	$ 133,714.92
CDBG-R Funds	$ 143.437.50
Total Program Funds Used	$1,231,171.25

Housing Activities

As previously stated, there were 67 households assisted with CDBG funds in FY 2010. The activities are completed on a citywide basis and are located in the following census blocks. The shaded census blocks indicate LMI.

Census Tract	Emergency	MG	Loans	Paint	DPA
5080.00-1					
5080.00-2					
5080.00-3					
5080.00-4					
5201.01-1		**2**	**1**		
5201.01-2					
5201.01-3		1			
5201.01-4					
5201.01-5		**1**	**1**		
5201.01-6		**2**			
5201.02-1		3			
5201.02-2	1	2	1		
5201.02-3		1			
5202.01-1					
5202.01-2		1		1	
5202.01-3			1	1	
5202.02-1					
5202.02-2		**1**		**3**	
5202.02-3					
5202.02-4				1	
5202.02-5	1	1	1	1	
5203.00-1					
5203.00-2		1			
5203.00-3					
5203.00-4	1	2	1		
5203.00-5		**1**			
5203.00-6		1			
5204.00-1		1			1
5204.00-2		1			
5204.00-3				1	
5204.00-4		2		1	
5204.00-5		1		1	
5204.00-6					
5205.00-1	1	1	1		
5205.00-2		1			
5205.00-3	1	1			
5205.00-4					1
5205.00-5		2			1
5205.00-6				1	
5206.00-1		1		2	
5206.00-2			1		1
5206.00-3		4			
5329.00-1		1			
5329.00-2				1	
5329.00-3		1			
Totals	5	37	8	14	4

Infrastructure
The South Front Street Redevelopment Corridor is located in Census Tract 5202.02-1, which is an 85.9% low-mod area within the Cuyahoga River Planning Area. The City began a 2-year project in 2008 that extended Prospect Avenue from Front Street to Second Street. As previously explained, the new street provides public access to a new urban park along a National Heritage River. The engineering was completed utilizing funds from FY 2008-2009 with bid documents prepared. However, due to the bidding environment and to keep the project on budget, the bidding was delayed to Fall 2010 with construction 95% complete by the end of the current program year utilizing funds for construction from FY2009-2010.

The second project, categorized as infrastructure – Niki's Walk (nka Patrick's Walk), assisted with the survey work and a Market Housing Analysis study needed application for a HUD 221(d)(4) loan. It is estimated the CDBG funds committed to this project represent approximately .015% of the total anticipated project costs.

The third infrastructure project is the Stone Street Improvement. This is a multi-year project due to funding constraints. The design and engineering for the reconstruction of Stone Street from Broadway East to Munroe Falls Avenue began in FY 2010. Improvements will include placing new underground utilities, road surface and sidewalks on Stone Street. This project is located in an area where 15% of the persons are below the poverty level and low to moderate income census blocks, 5201.01-6 and 5201.01-1.

Economic Development
As detailed above, 3 loans were made by the end of the program year. 3% loans were made to Advanced Cryogenic Enterprises LLC ($140,000) and Bark at Home LLC ($50,000. A forgivable loan was given to AG PrintPromo ($5,000).

Also categorized as economic development were two spot slum and blight projects explained in detail on Page 5.

All public record files of the CDBG program are held in at the City of Cuyahoga Falls, Community Development Department, 2310 Second Street, Cuyahoga Falls, Ohio 44221 for viewing by any citizen, public agency, or other interested party between the hours of 8 a.m. and 5 p.m. The Consolidated Plan, Annual Action Plans for years 2004, 2005, 2006, 2007, 2008, 2009, 2010 and 2011, Fair Housing Program, Economic Development Revolving Loan Program including applications and Project Fresh Start information are available at the City of Cuyahoga Falls' website www.cityofcf.com.

Institutional Structure

1. *Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.*

Funding Year 7 CAPER Institutional Structure response:

The City of Cuyahoga Falls works with various community organizations to promote growth in the City. Presently, the City is working with two other communities to make the necessary infrastructure improvements for construction of a new hospital to be located at the heart of three adjoining communities.

In addition, the CDBG staff works in partnership with the Summit County Weatherization program to assist LMI households in our community. When the Summit

County staff are called to a home located in Cuyahoga Falls and there are needed improvements they cannot make with their funding, the project coordinator contacts Cuyahoga Falls' CDBG staff to assist with making the necessary improvements.

The Ohio Department of Development, through the Office of Housing and Community Partnerships, and the Ohio Housing Finance Agency provide various types of public financing to assist in the provision of affordable housing. These programs can be used for owner housing, rental housing, new construction, housing rehabilitation, home acquisition, and supportive services. At this time, the Watermark, on South Front Street, is the only project receiving OHFA low income housing tax credits.

The following agencies provide housing and housing related services in the community and surrounding areas:

Akron Metropolitan Housing Authority
Akron-Summit Community Action Agency
Alcohol, Drug Addiction and Mental Health Services Board
Area Agency on Aging
Children Services Board
Board of Developmental Disabilities
Ohio Multi-County Development Corporation
National Church Residences

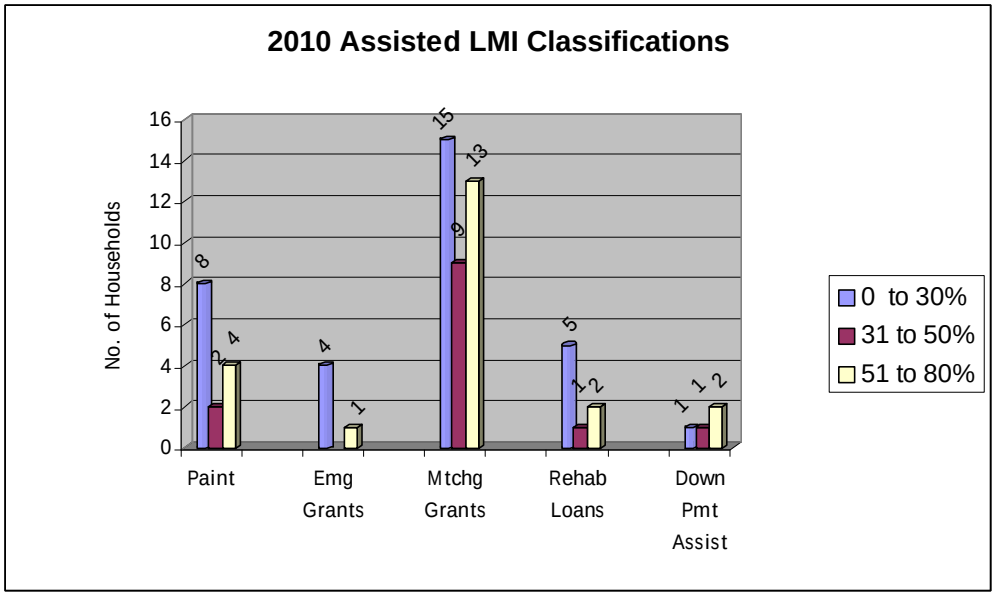
Monitoring

1. *Describe how and the frequency with which you monitored your activities.*
2. *Describe the results of your monitoring including any improvements.*
3. *Self Evaluation*
   a. *Describe the effect programs have in solving neighborhood and community problems.*
   b. *Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.*
   c. *Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.*
   d. *Indicate any activities falling behind schedule.*
   e. *Describe how activities and strategies made an impact on identified needs.*
   f. *Identify indicators that would best describe the results.*
   g. *Identify barriers that had a negative impact on fulfilling the strategies and overall vision.*
   h. *Identify whether major goals are on target and discuss reasons for those that are not on target.*
   i. *Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.*

Funding Year 7 CAPER Monitoring response:

1. The City of Cuyahoga Falls monitors its program activities on a weekly basis for inclusion in a weekly status report to the department head. An in-depth review verifies that any activities, which are underway, were included in the Consolidated Plan and Annual Action Plan, are properly classified, an environmental review was completed and is at the appropriate level for the activity and determination of qualification under the program guidelines was correct. A file checklist is included in every housing activity file. The Economic Development Revolving Loan Program requires job creation reports.

2. The following chart indicates the results of our monitoring program and it also confirms the change we implemented in 2009 to include the low income category in our housing activities for residents of greatest need was successful.



3. Self Evaluation

a. The City of Cuyahoga Falls Housing Rehabilitation Program continues to be an effective tool to resolve neighborhood and community problems. Many of the program participants are referred by the City's Housing Division and have experienced some of the most significant housing problems in the city. The resolution of these housing needs makes a positive impact on the quality of the housing in the neighborhood where participants are located.

b. During the 2009-2013 Consolidated Planning process, the community determined that substandard, owner-occupied housing was a high priority. The CDBG housing rehabilitation program continues to focus exclusively on substandard owner-occupied housing.

c. The City of Cuyahoga Falls is not a housing provider. The City of Cuyahoga Falls diligently works with homeowners, landlords, and the Akron Metropolitan Housing Authority to address housing needs in the community. Homeowners are assisted through the Housing Rehabilitation Program and the Cuyahoga River Community Reinvestment Area tax incentive program. All housing code violation complaints are processed by City Housing Inspectors who work to resolve the housing issue as soon as possible.

d. At the present time, we do not have any projects that are falling behind schedule.

e. The City of Cuyahoga Falls uses new job creation, the improvement of living environment and decent housing as the basis to evaluate program results. The Economic Development Loan Program created 5 FTE's from three loans, which have a requirement of 6.5 new LMI jobs within an 18 month period. The Housing Rehabilitation Program provides funding as a means for residents to correct health and safety concerns related to their homes. The outcome is the improvement of existing housing, which is determined to be decent housing for program participants.

f. The indicators would be the number of households assisted being higher than the goals as shown on page 1.

g. The primary barrier in fulfilling the vision of the consolidated plan strategies is the limits of the program funding.

h. Most major goals for the CDBG Program are on target. The Economic Development Loan Program continues to be marketed with the opportunity for low interest loans with job creation as the primary goal. Job creation during this difficult economic period is proving problematic

i. The City of Cuyahoga Falls will make adjustments and improvements to increase program effectiveness or flexibility to accomplish program goals and to meet all Community Development Block Grant Program requirements as needed.

Lead-based Paint

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Funding Year 7 CAPER Lead-based Paint response:

In accordance with the 2010 EPA rule, the City of Cuyahoga Falls addresses lead-based paint hazards as needed during housing activities. All housing activity application packets contain a copy of "Protect Your Family From Lead In Your Home" and "Renovate Right".

For the housing rehabilitation requests, emergency grants, and matching grants, the applicants must sign a receipt that they have received the brochure. When paint reimbursement applications have been reviewed and approved, the fact sheet "Federal Requirement for Volunteer Paint and Rehabilitation Programs" is provided with other necessary program materials.
All NSP funded homes have a lead risk assessment completed and are completely abated.

The Summit County Health Department conducts elevated blood level testing. The most current data available from the Ohio Health Department indicates the County Health Department tested 7,035 children under the age of 72 months in 2009. 6,523 had blood level readings of less than 4 ug/dL, 452 had 5-9 ug/dL, 16 had a reading of 10-14 ug/dL, 10 had 15 – 19 ug/dL, 1 child had a reading of 20 – 24 ug/dL, and 3 children had readings 25 ug/dL and higher. The City of Cuyahoga Falls was not listed.

HOUSING

Housing Needs

1. *Describe Actions taken during the last year to foster and maintain affordable housing.*

Funding Year 7 CAPER Housing Needs response:

The City of Cuyahoga Falls works to foster and maintain affordable housing. The City has determined that available funds will be used to address owner-occupied housing issues so that substandard conditions will be resolved and affordable housing will meet

community-wide housing standards. The housing rehabilitation loan program provides low interest or zero percent interest loans to income-qualified homeowners to address housing issues while maintaining the affordability of the home. At this time, the city does not own any housing units. The City's Housing Division will perform inspections of rental units as requested and identify substandard conditions. The inspectors then work with the owner to bring the unit up to code.

The City of Cuyahoga Falls Housing Division employs a manager and one full-time inspectors to monitor the condition of housing and to work with residents and landlords to address substandard conditions and overcrowding. The Housing Division also works with Akron Metropolitan Housing Authority to address any public housing issues. All activities focus on the City's commitment to clean, safe, affordable housing within the community. The Annual Action Plan did not include any goals for the renter housing needs in the community as our funding will not be able to fully address the existing housing needs gap in the owner occupied units. We continue to evaluate the requirements for a rental inspection program.

Specific Housing Objectives

1. *Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.*
2. *Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.*
3. *Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.*

Funding Year 7 CAPER Specific Housing Objectives response:

1. Accomplishments in Meeting Proposed Goals

The City of Cuyahoga Falls' established goal is to increase owner occupied households in areas with a high concentration of rental units. In 2010, the City's housing programs were successful in meeting the objectives of improving the quality of affordable housing for LMI households. In addition the Cuyahoga River Community Reinvestment Area has provided over $3,447,775 of tax incentives for residential improvements in the Cuyahoga River Planning Area. No applications for tax incentives were received during FY 20109. A review of building permits and their associated valuations did not indicate any improvements that would qualify for the program as prescribed by Summit County Fiscal Office, the taxing jurisdiction.

Below is a table that shows the goal and accomplishment for each housing program for FY 2010. In 2009, the matching grant program was changed to a city-wide program. Previously it was only offered as a Heslop Matching Grant for people who owned this type of home. Inasmuch as there are approximately 3,000 Heslop-style homes in a city with over 23,500 housing units, it was only available to 12.8% of the total housing units. The matching grant program was changed to a city-wide income qualified program in 2009 and has been very successful. The program is being utilized by residents who are in an upside down situation with their mortgages due to the devaluation of property values.

	Objective and Accomplishment		By Household Income

	2010 Proposed Goal	2010 Total Assisted	% of Total Assisted	Extremely Low 0 to 30%	Very Low 31 to 50%	Low 51 to 80%
Emergency Grants/Rehab Loan	5	5/8	260%	9	1	3
Matching Grants	2	37	740%	15	9	13
Paint Reimbursements	8	14	175%	8	2	4
DPA	5	4	80%	1	1	2

There is a wide-range of housing options available in the community. The City of Cuyahoga Falls has a diverse offering of housing options and an approved General Development Code, which encourages mixed-use higher density development.

The largest number of new housing units has been constructed in the Northampton Planning Area due to the availability of previously undeveloped land. The table below shows the average income, median rental rate, amount of median mortgage payment along the number of households for the four planning areas of the City based on the 2000 census data as the in-depth statistics are not yet available from the 2010 census, which should be released very soon.

Housing Statistics

	Cuyahoga River Plan Area	State/ Portage Trl Plan Area	Bailey/ Munroe Falls Plan Area	Northampton Plan Area	Average
Average Income	$43,927	$46,681	$41,122	$48,942	$45,168
Median Rental	$476	$492	$612	$552	$533
% of Ann. Income	13.0%	12.6%	17.9%	13.5%	14.3%
Median Mortgage	$840	$954	$845	$1,368	$1,002
% of Ann. Income	22.9%	24.5%	24.7%	33.5%	26.4%
# of Households	4,603	11,056	4,416	2,659	22,734
HH below 30%	986	1,119	658	253	3,016
% below 30% (Area)	21.4%	10.1%	14.9%	9.5%	13.3%

*Source: 2000 Census

The City of Cuyahoga Falls completed the Cuyahoga River Corridor Brownfield Area Master Plan in August 2005 and the State Road Corridor Master Plan in February 2006. Both Planning Areas are located in low-moderate census block groups and have a mixture of commercial and residential uses within them. There are redevelopment opportunities in the Cuyahoga River Planning Area as it is the older section of the City. At the conclusion of FY 2010, The Watermark was under roof with interior work being completed. This project will be utilizing OHFA tax credits. The City is fostering affordable housing by being proactive in our General Development Code and actively engaging private investors in the development of mixed density projects as well as creating incentives (Cuyahoga River Community Reinvestment Area) for redevelopment.

2. Providing Affordable Housing

The City of Cuyahoga Falls is home to a large number of publicly assisted housing units but does not own or provide housing of any type. There are a large number of rental units, both multi-family and single-family, that are designated as affordable housing units under Section 215.

The Akron Metropolitan Housing Authority is participating in the Section 8 Tenant Based Assistance Section 8 (y) Homeownership Program. The program will allow families whose minimum earned income is $18,000 to work towards home ownership. This is an opportunity for families to take the step towards home ownership in the community in which they reside. To date there have not been any homes purchased in Cuyahoga Falls under this program.

3. Efforts to Address Worst Case Scenarios

The Housing Rehabilitation and Emergency Grant Programs were created to address worst case housing needs and to assist persons with disabilities. Worst case scenarios are considered emergencies and processed immediately with a streamlined processing to immediately resolve the emergency condition(s).

This program focuses on making a home safe and sound. The City of Cuyahoga Falls Housing Division is a program partner and makes valuable contributions to the success of this program. Inspectors are involved with homes that are in need of significant repair to meet minimum property standards and make referrals to the program. Their involvement is critical to reaching those residents with the most critical housing needs.

We have an established partnership with the Summit County Weatherization Program to make the largest impact possible for our residents with housing needs.

The emergency grant program repaired plumbing and waterline leaks in three homes, completed an electric upgrade, and completed mold remediation in a house of a disabled male homeowner. The entire family suffered from asthma and the mold was making his entire family ill, while hospitalizing the head of household.

Public Housing Strategy

1. *Describe actions taken during the last year to improve public housing and resident initiatives.*

Funding Year 7 CAPER Public Housing Strategy response:

The City of Cuyahoga Falls is not a public housing authority but has 642 housing units managed by the Akron Metropolitan Housing Authority (AMHA). AMHA has been consistently rated a high performing public housing authority. The Akron Metropolitan Housing Authority not only operates public housing, but also contracts the operation of public housing and issues many vouchers that provide public housing to low moderate families in our community. Donald Eager of Donald B. Eager and Associates continues to be instrumental in working with the Sutliff II Tenants Council. The Tenants Council is an important group that facilitates tenants' concerns to property management staff. This building is one of the largest multi-family financially assisted complexes in the community.

In late 2010, AMHA completed $1M of major improvements at Sutliff I, a 185 unit building, which included first floor common areas with new restrooms, billiards, crafts

& gifts rooms, community room, lounge, lobby and vestibule, building management offices, a new library, computer center and a residents council meeting room. The capital improvements the AMHA has made over the years, utilized funds provided by HUD through the Comprehensive Grant Program. AMHA units in the City of Cuyahoga Falls have a low vacancy rate.

AMHA operates scattered site single-family homes in our community and reports it has revamped its inspection procedures and has created appearance and operational standards. They are committed to the process of improving public housing located in the City of Cuyahoga Falls. Additionally, AMHA is firmly committed to providing reasonable disability accommodations and Section 504 compliance changes. In the event, there is a problem with one of the single-family homes, AMHA works very quickly with the City to remedy the situation.

At the time this document is being written, AMHA is in the process of submitting an annual plan. One item in the plan is the disposition of 220 Wadsworth Avenue in our community. A developer has contacted us about construction a market rate apartment complex on four adjoining lots and 220 Wadsworth Avenue is one of the lots. We are very much in favor of this development and are issuing a certification of PHA plans for consistency with the Consolidated Plan.

Barriers to Affordable Housing

1. *Describe actions taken during the last year to eliminate barriers to affordable housing.*

Funding Year 7 CAPER Barriers to Affordable Housing response:

Barriers to affordable housing are directly associated with the economy. While average housing prices in Cuyahoga Falls have decreased an additional 2.5% in 2010 from the 8% drop in 2009 as foreclosed homes hit the market, taxes and insurance costs have increased considerably. The average selling price of a home in Cuyahoga Falls in 2010 was $127,338, whereas in 2008, it was $139,477. As we all know, many property owners used Adjustable Rate Mortgages (ARMs) to purchase homes during the period of rapid price increases to make their monthly payments affordable; this practice lead to predatory lending. As the housing market started to decline, borrowers did not have the needed equity in their homes to refinance into traditional loans, thus many faced foreclosure.

To address the negative impact of the foreclosures, the City was awarded a Neighborhood Stabilization grant provided by the State of Ohio Department of Development in the amount of $783,204. These funds were used to purchase six vacant, foreclosed homes in order to rehabilitate the property to create an affordable housing option for a 120% AMI qualified household. To date, 3 of the homes have been sold to income qualified persons, 1 home was demolished and sold to the LMI neighbor, and of the remaining two homes; one is under contract and the other is still listed for sale. With the program income generated, we have purchased 3 additional homes – 2 are being rehabbed and the last one is being reconstructed.

In addition, we still provide information on various project options available to owners of Heslop-style homes. This home type is one of the most affordable units in the community having been constructed post-World War II. The Residential Matching Grant program encourages the renovation, expansion and preservation of over 3,000 single family Heslop-style homes. These homes are between 50-60 years old and are at the greatest risk as they suffer from lack of reinvestment resulting in substandard conditions. They are also modest and affordable. They have played an important role in

the transition to home ownership for several generations and we are assuring they continue to play this role for families seeking to own their affordable homes.

Any institutional barriers in the Development and Zoning Codes to affordable housing were eliminated when the new General Development Code was adopted in July 2005 and amended in July 2009. This new code creates mixed use, mixed density districts on arterial and collector streets and focuses on the promotion of additional affordable housing as part of new construction projects. The code also encourages high-density uses in redevelopment situations. The City supports the development of combined market rate and assisted units within new projects as encouraged with the new General Development Code.

HOME/ American Dream Down Payment Initiative (ADDI)

1. *Assessment of Relationship of HOME Funds to Goals and Objectives*
   a. *Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.*
2. *HOME Match Report*
   a. *Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.*
3. *HOME MBE and WBE Report*
   a. *Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).*
4. *Assessments*
   a. *Detail results of on-site inspections of rental housing.*
   b. *Describe the HOME jurisdiction's affirmative marketing actions.*
   c. *Describe outreach to minority and women owned businesses.*

Funding Year 7 CAPER HOME/ADDI response:

Not applicable. The City of Cuyahoga Falls does not receive HOME Funding.

HOMELESS

Homeless Needs

1. *Identify actions taken to address needs of homeless persons.*
2. *Identify actions to help homeless persons make the transition to permanent housing and independent living.*
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Funding Year 7 CAPER Homeless Needs response:

1. The Akron/Summit County Continuum of Care represents a broad collaborative effort of homeless service providers, supportive service providers, hospitals, The University of Akron, banks and foundations. Homeless providers are working together to further enhance a system providing emergency, transitional, and permanent shelter to homeless individuals, families, and special needs populations. The Continuum of Care system provides the homeless with not only shelter, but also supportive services to equip them with the tools necessary to assist them in overcoming this difficult period in their lives. The Continuum of Care Committee, of which the City of Cuyahoga Falls is a member, meets on a regular basis to further evaluate the needs in the community and to identify existing gaps.

Funding for the Akron/Summit County Continuum of Care is in the form of SHP (Supportive Housing Program) and ESG (Emergency Shelter Grants) funds. The City of Cuyahoga Falls does not receive either type of funding. However, the City of Cuyahoga Falls budgets $5,000 each program year to be used as matching funds for Continuum of Care and HMIS activities.

The third annual Homeless Connect event was held in Akron, Ohio on May 10, 2011. This event assembles commonly used, though difficult to access, services in a one stop centralized service center. Some of the services provided were vision care, legal aid, medical testing, food, wheelchair repair and hair cuts. The report for 2011's event has not been issued at this time. However, approximately 822 people were assisted in 2010 with approximately 7,300 pounds of food, $4,100 of hygiene products, 247 haircuts and $4,620 clothing vouchers distributed during this one-day event. There were a total of 3,835 volunteer hours logged and 50 agencies involved to make this event a huge success.

The City of Cuyahoga Falls does not have a large homeless population, however, we are dedicated to addressing the needs of homeless persons. The Annual Report issued by HMIS indicated there were 106 persons assisted in 2010 who indicated Cuyahoga Falls as their last residence, whereas 126 persons assisted in 2009. Of the 106 persons assisted in 2010, 92 were new clients. This represents 1.8% of the total persons assisted by the Akron/Summit County Continuum of Care or 5,662 clients served.

2. There are 9 emergency shelters, 28 transitional housing, and 14 permanent shelter facilities in Summit County with approximately 1,342 available housing units in the Akron/Summit County area. These statistics have not changed. The housing needs table indicates there is a gap between the number of units available and the number of units needed (393) on a countywide basis. Three of the transitional facilities are located in Cuyahoga Falls and one of the facilities is for homeless women with children. All of these facilities are regional and house persons from Summit County, not just Cuyahoga Falls. The City works with the local Continuum of Care and would assist in the construction new facilities if needed. As stated in the PY 5 CAPER, the City of Cuyahoga Falls worked with the Ohio Multi-County Development Corporation to get approval for a 14 unit permanent shelter in a residential district for the physically challenged. At this time, the complex is complete and fully occupied.

3. The City of Cuyahoga Falls did not receive Homeless SuperNOFA funds.

Specific Homeless Prevention Elements

1. *Identify actions taken to prevent homelessness.*

Funding Year 7 CAPER Specific Housing Prevention Elements response:

The City of Cuyahoga Falls remains unchanged in its efforts to prevent homelessness since becoming an entitlement City. In conjunction with Akron/Summit County Continuum of Care, a strategic plan to end chronic homelessness in Akron/Summit County was created.

The Akron/Summit County Continuum of Care continues to address homelessness issues in Summit County. The Continuum of Care is a community plan to organize and deliver housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximum self-sufficiency. It includes action steps to end homelessness and prevent a return to homelessness.

The fundamental components of a comprehensive Continuum of Care system are:

- Outreach, intake and assessment to identify an individual's or family's service and housing needs; and to link them to appropriate housing and/or service resources.
- Emergency shelter and safe, decent alternatives to the streets
- Transitional housing with supportive services to help people develop the skills necessary for permanent housing
- Permanent housing and permanent supportive housing.

Emergency Shelter Grants (ESG)

1. *Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).*
2. *Assessment of Relationship of ESG Funds to Goals and Objectives*
   a. *Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.*
   b. *Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.*
3. *Matching Resources*
   a. *Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.*
4. *State Method of Distribution*
   a. *States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.*
5. *Activity and Beneficiary Data*
   a. *Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.*
   b. *Homeless Discharge Coordination*
      i. *As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.*
   c. *Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.*

Funding Year 7 CAPER ESG response:

Not applicable as the City of Cuyahoga Falls does not receive Emergency Shelter Grant Funds. The City does not fund nor operate an emergency shelter facility.

COMMUNITY DEVELOPMENT

Community Development

1. *Assessment of Relationship of CDBG Funds to Goals and Objectives*
   a. *Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.*
   b. *Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.*
   c. *Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.*
2. *Changes in Program Objectives*

   a. *Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.*
3. *Assessment of Efforts in Carrying Out Planned Actions*
   a. *Indicate how grantee pursued all resources indicated in the Consolidated Plan.*
   b. *Indicate how grantee provided certifications of consistency in a fair and impartial manner.*
   c. *Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.*
4. *For Funds Not Used for National Objectives*
   a. *Indicate how use of CDBG funds did not meet national objectives.*
   b. *Indicate how did not comply with overall benefit certification.*
5. *Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property*
   a. *Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.*
   b. *Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.*
   c. *Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.*
6. *Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons*
   a. *Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.*
   b. *List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.*
   c. *If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.*
7. *Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit*
   a. *Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.*
8. *Program income received*
   a. *Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.*
   b. *Detail the amount repaid on each float-funded activity.*
   c. *Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.*
   d. *Detail the amount of income received from the sale of property by parcel.*
9. *Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:*
   a. *The activity name and number as shown in IDIS;*
   b. *The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;*
   c. *The amount returned to line-of-credit or program account; and*
   d. *Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.*
10. *Loans and other receivables*
   a. *List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.*
   b. *List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.*
   c. *List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.*
   d. *Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.*
   e. *Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.*
11. *Lump sum agreements*
   a. *Provide the name of the financial institution.*

b. Provide the date the funds were deposited.
c. Provide the date the use of funds commenced.
d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year
a. Identify the type of program and number of projects/units completed for each program.
b. Provide the total CDBG funds involved in the program.
c. Detail other public and private funds involved in the project.

13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies
a. *Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.*

Funding Year 7 CAPER Community Development response:

1. Assessment of Relationship of CDBG Funds to Goals and Objectives

Using both FY 2010 CDBG Entitlement funds and available CDBG dollars from prior years, the City of Cuyahoga Falls was very successful in meeting the priorities, needs, goals, and specific objectives of the Consolidated Plan. The City has identified the following needs/strategies:

- Increase availability of affordable rental housing – *unfunded*
- Increase rental housing inspections – *unfunded - currently being researched for future implementation*
- Increase availability of affordable owner housing – *Neighborhood Stabilization Program allowed us to purchase 9 vacant, foreclosed homes to rehab and sell to income qualified owner occupants*
- Increase quality of owner occupied housing – *Housing Rehabilitation Program activities – funded by CDBG*
- Increase the range of housing options and related services for persons with special needs – *Impediments to Fair Housing Study – funded by CDBG*
- Increase the number of persons moving from homelessness or transitional housing to permanent housing – *participation in Continuum of Care and grant for plan to end homelessness – funded by CDBG*
- Increase quality of public improvements for lower income persons – *Infrastructure projects - funded by CDBG*
- Remediate and redevelop brownfields – planning and environmental evaluation project – *funded by CDBG and Ohio EPA Grant funds*
- Improve economic opportunities for lower income persons – *Economic Development Revolving Loan Fund – funded by CDBG*
- Other strategies identified by the City of Cuyahoga Falls – *None during this program year*

The City of Cuyahoga Falls has used CDBG funds on Phase I of the Cuyahoga River Corridor Brownfield Area Project and is preparing for work on Phase II, which will include environmental assessments, remediation, demolition and new public/private construction. The following funds have been used for the projects: Clean Ohio Redevelopment Funds (CORF), Ohio Department of Natural Resource (ODNR), US EPA Brownfield Assessment, CDBG, City of Cuyahoga Falls, and private financing. The City is currently preparing an application for additional CORF funds from the State of Ohio. These projects are located in LMI Census Block 5202.02-1that has an 85.9% LMI rate.

Ohio Housing Financing Agency (OHFA) and private funds are being used to construct a 40-unit mixed-use building that will include retail on the first level and market-rate

and tax-credit senior apartments on the upper levels. The project will provide stabilization and revitalization to a low to moderate-income Census Block 5202.02-1. CDBG-R funds have been used for the senior housing infrastructure.

Program Year 7 was another extremely busy year for Housing Activities under the CDBG program. The Housing Activities Program reduced the residential matching grant from $15,000 to $10,000.

The chart on page 13 details the LMI categories for all persons assisted with CDBG funds during FY 2010. The following table highlights the breakdown by head of household.

Activity	M HH	F HH	E MHH	E F H H	D M H H	D F H H
Paint	4	5	1	4	0	0
Emg Grants	1	2	0	0	2	0
Mtchg Grants	9	16	3	7	0	0
DPA Loans	1	2	0	0	0	1
Rehab Loans	1	3	0	1	2	1

2.) Changes in Program Objectives

The City of Cuyahoga Falls has not changed the objectives of its CDBG program and continues to strategically use CDBG funds to maximize leverage for infrastructure improvements, housing activities, economic development opportunities, and planning and administration activities. There is a continuous need for CDBG funds to fulfill objectives in all of the above categories. Therefore no changes are recommended.

3.) Assessment of Efforts in Carrying Out Planned Actions

The City of Cuyahoga Falls pursued all potential resources stated in the Consolidated Plan by working with developers and other governmental agencies to leverage our CDBG expenditures and in order to realize a larger impact to the community.

The City of Cuyahoga Falls provides certifications of consistency in a fair and impartial manner. Each request was analyzed to insure it meets the goals and objectives of the Consolidated Plan.

The City of Cuyahoga Falls did not by action or willful inaction hinder the implementation of the Consolidated Plan. The plan components are all established, program guidelines are in place and each program is currently conducting activities.

4.) Funds Not Used for National Objectives

All CDBG funded activities, except planning and administration, met national objectives and all requirements with regard to providing benefit to LMI persons.

The City is currently in compliance with the overall benefit certification.

5.) Anti-displacement and Relocation

The City of Cuyahoga Falls has established an Anti-Displacement and Relocation Policy and will use its best efforts to minimize activities that may cause displacement or

relocation. The City did not acquire or demolish any properties during FY2010 and rehabilitation activities did not require relocation of owner occupants.

The City has not displaced any persons, households, businesses, farms or non-profit organizations.

There were no displacement notices as no projects involved the displacement of any parties.

6.) Low/Mod Job Activities

During FY 2010, the City of Cuyahoga Falls made three economic development loans, which were pending at the end of FY 2009 and were approved in FY 2010 with a total job requirement of 6.5 LMI jobs during the next 18 months.

A loan of $140,000 to Advanced Cryogenic Enterprises LLC for the purchase of a badly needed piece of equipment to pulverize sodium carbonate, job creation requirement of 4 LMI jobs by March 30, 2012. As of 6/30/11, 3 LMI jobs have been created.

A loan of $50,000 to Bark at Home LLC was used for start up costs as a companion business to a very popular doggie daycare, Camp Bow Wow. Bark at Home provides in-home pet care. The job creation requirement is 2 LMI jobs by April 1, 2012. As of 6/30/11, 1 LMI job as been created.

A forgivable loan of $5,000 to AG PrintPromo, an MBE business, was used for moving and set up costs associated with relocating from rental space in the city to a building the company purchased. The job creation requirement was a .5 LMI job. As of 5/2/11, 2 PT's had been hired to equal 1 FTE.

The following table shows the breakdown of jobs created.

Job Type	Forgivable Loan A-G PrintPromo Jobs Created		Bark at Home Jobs Created	Advanced Cryo Enterprises Jobs Created
Professionals				
Officials and/or managers				
Sales				
Technicians				
Office & Clerical	2 PT			
Skilled Craft Workers				
Semi-skilled Operatives				3
Service Workers			1	
Unskilled Laborers				
*All positions were filled				
by LMI persons				

7.) Low/Mod Limited Clientele Activities

The City did not have any activities qualified on the basis of limited clientele.

8.) Program Income Received

The City of Cuyahoga Falls received and reported $47,458.60 in new program income for FY 2010 and $50,546.48 in new Revolving Loan Funds. Payments in the amount of $28,574.05 were reported for the Housing RLF and $21,972.43 for the Economic Development RLF. Funds deposited in the Housing RLF will be used for housing rehabilitation loans for LMI persons and Economic Development RLF funds will be used for loans to create job opportunities for LMI persons. As explained in the 2009 CAPER, we submitted a substantial plan amendment as advised by HUD for previously unidentified program income, $624,248.61, which was determined to be valid program income that should be reported to HUD. After complying with the Citizen Participation notifications, Cuyahoga Falls City Council approved the amendment and it was submitted to HUD on July 15, 2010 for approval. However, as explained on page 9 of this document due to an oversight not all of the funds from the substantial plan amendment were entered into IDIS. This omission has been corrected.

As required by 24 CFR 570.500(b), interest earned on the RLF has been transmitted to the U.S. Treasury.

The City of Cuyahoga Falls did not have any float-funded activities.

The City of Cuyahoga Falls did not receive any income from the sale of property.

9.) Prior Period Adjustments

There were not disallowed activities or expenditures in FY 2010.
There were no prior period adjustments in FY 2010.

10.) Loans and Other Receivables

The City does not have any float-funded activities. Following is a listing of the entire CDBG loan portfolio as it now stands.

Loan Type	Add	Street	0% Defd	RLF 0%	RLF 3%	Written off	Forgivable	Court Jdgmt	Pd FY 2010	Status
Hsg Rehab	1146	Myrtle Avenue		$22,625.00						
Hsg Rehab	1738	9th Street		$5,565.00						
Hsg Rehab	1640	Hanover St.		$10,085.00						
Hsg Rehab	712	Tallmadge Rd		$4,050.00						
Hsg Rehab	2840	Audrena Ct		$15,525.00						
Hsg Rehab	2214	6th St.			$22,015.57					Pmts current
Hsg Rehab	1440	Treasch Dr		$24,377.30						
Hsg Rehab	1113	Sackett Ave		$16,160.00						
Hsg Rehab	831	Monroe Ave		$992.03						
Hsg Rehab	2073	Bailey Rd					$41,066.72			
Hsg Rehab	1621	Williams St		$13,837.00						
Hsg Rehab	2610	11th St.		$10,400.00						
Hsg Rehab	714	Arcadia Ave		$7,500.00						
Hsg Rehab	665	Ardella Dr							$19,862.00	Paid in full 4/4/11
Hsg Rehab	1029	Falls Ave		$10,535.00						
Hsg Rehab	119	Grant Ave		$23,956.00						
Hsg Rehab	1644	Bailey Rd		$10,347.00						
Hsg Rehab	1232	Lincoln Ave			$12,312.39					Pmts current
Hsg Rehab	900	Davis Ave							$5,551.26	Paid in full 2/28/11
Hsg Rehab	1298	Myrtle Ave		$4,300.00						
Hsg Rehab	1818	Newberry St		$6,650.00						
Hsg Rehab	1730	4th St		$15,043.00						
Hsg Rehab		2127 21st St			$3,798.96					Pmts current
Hsg Rehab		3056 Kilarney St		$13,908.00						

Hsg Rehab	575 Lynn Dr		$7,130.00					
Hsg Rehab	3370 Caleb St		$19,980.00					
Hsg Rehab	2061 Cook St		$25,422.00					
Hsg Rehab	2113 Northmoreland		$7,543.00					
Hsg Rehab	1540 13th St			$10,659.58				Pmts pd thru 12/2011
DPA	3036 Oakwood Dr				$3,000.00			affordability date 3/15/2016
DPA	2416 4th St				$3,000.00			affordability date 5/23/2016
DPA	2910 Northland Ave				$3,000.00			affordability date 6/8/2016
DPA	2868 Hudson Dr				$3,000.00			affordability date 12/9/2015
Hsg Rehab	2844 Audrena Ct	$19,791.00						
Hsg Rehab	606 Loomis Ave	$19,557.00						
Hsg Rehab	2015 Germaine	$20,000.00						
Hsg Rehab	410 Magnolia	$13,800.00						
Hsg Rehab	1437 Anderson	$20,000.00						In foreclosure
Hsg Rehab	2456 - 15th	$19,465.00						
Hsg Rehab	2520 - 4th	$6,950.00						In foreclosure
Hsg Rehab	1606 - 11th	$14,750.00						
Hsg Rehab	2761 - 6th	$20,000.00						
Hsg Rehab	23 Pierce	$10,850.00						
Hsg Rehab	2212 - 20th	$2,475.00						
Hsg Rehab	1507 Main	$20,000.00						
Hsg Rehab	2280-10th	$19,999.80						
Hsg Rehab	2104 Byrd						$9,752.00	Paid in full 4/20/11
Hsg Rehab	1634 Union	$20,000.00						Dec'd - in probate court
Hsg Rehab	2370 Larchdale	$19,205.00						
Hsg Rehab	2685 Northland	$6,500.00						
Hsg Rehab	2796 - 9th	$10,000.00						
Hsg Rehab	1738 - 9th	$19,435.00						
Hsg Rehab	2306 Giffels	$19,665.00						
Hsg Rehab	119 VanBuren	$7,525.00						
Hsg Rehab	1256 Anderson	$11,607.00						
Hsg Rehab	1637 Main	$8,833.54						
Hsg Rehab	312 Marguerite	$16,970.00						
Hsg Rehab	2462 Talbot	$12,695.00						1/3/10 house for sale
Hsg Rehab	2473 Berk	$16,138.00						
Hsg Rehab	2045 Cook	$12,543.06						
Hsg Rehab	2583 - 7th	$4,945.21						
Hsg Rehab	437 Keenan	$14,566.00						
Hsg Rehab	237 Washington	$10,026.00						
Hsg Rehab	2332 Sutton	$9,820.00						
Hsg Rehab	2616 Hawthorne	$10,586.80						
Hsg Rehab	612 Loomis	$20,000.00						
Hsg Rehab	1645 Union	$5,900.00						
Hsg Rehab	419 Grove	$19,000.00						
Hsg Rehab	2610 Fairland	$19,295.00						
Hsg Rehab	634 Otis	$9,914.70						
Hsg Rehab	17 Pierce	$10,000.00						
Hsg Rehab	1408 Falls	$25,000.00						
Hsg Rehab	1941 Cook	$19,985.00						
Hsg Rehab	2754 Fairview	$10,000.00		$7,391.15				Pmts current
Hsg Rehab	1686 Bancroft	$17,510.00						
Hsg Rehab	726 Albemarle	$16,477.50						pmts always late, pays late fee
Hsg Rehab	3240 - 7th	11886.73						
Hsg Rehab	2842 Oakwood	$1,300.00						
Hsg Rehab	2191 Wichert	$10,000.00		$9,574.00				Pmts current
Hsg Rehab	1299 Curtis	$14,888.11						
Hsg Rehab	1835 Hanover	$17,193.00						
Hsg Rehab	1566 - 10th	$15,446.00						
Hsg Rehab	1722 - 11th	$10,000.00						
Hsg Rehab	525 Meadow Ln.	$10,145.00		$1,210.14				Pmts current
Hsg Rehab	2840 Audrena	$2,850.00						
Hsg Rehab	1581- 8th	$10,000.00						
Hsg Rehab	641 Sackett	$25,005.00						
Hsg Rehab	2419 Clara					$4,300.00		plus 10% from 4/16/08
Hsg Rehab	1819 Schiller	$20,010.00						
Hsg Rehab	1563 - 11th	$7,733.00						
Hsg Rehab	1836 - 5th	$21,655.00						
Hsg Rehab	1214 Anderson	$12,700.00						

Hsg Rehab	122 May	$9,675.50							
Hsg Rehab	1029 Falls	$14,465.00							
Hsg Rehab	1747 Union	$25,000.00							
Hsg Rehab	2537 - 10th	$10,760.00							
Hsg Rehab	1513 Myrtle	$7,140.00							
Hsg Rehab	1670 Meriline	$5,760.00							
Hsg Rehab	1651 Underwood	$19,970.00							
Hsg Rehab	2331 Larchdale	$20,000.00							
Hsg Rehab	1515 Sackett	$15,642.00							5/1/10 house for sale
Hsg Rehab	446 Prospect	$9,294.00							
Hsg Rehab	307 May	$6,242.50							
Hsg Rehab	531 Grant	$8,927.40							
Hsg Rehab	1580 Meriline	$12,716.00							
Hsg Rehab	2586 - 25th	$4,920.00							
Hsg Rehab	1975 Searl	$18,847.24							in foreclosure
Hsg Rehab	3020 - 14th	$20,000.00							
Hsg Rehab	1846 Seattle	$16,385.00							
Hsg Rehab	317 Pierce	$6,528.50							
Hsg Rehab	636 Kathron	$9,695.00							
Hsg Rehab	1973 Tudor	$8,175.00							
Hsg Rehab	2704 - 6th				$15,185.00				Sheriff Sale 7/2011
Hsg Rehab	2122 - 26th	$19,095.00							
Hsg Rehab	2378 Giffels	$18,525.00							
Hsg Rehab	2280 Suncrest	$18,935.00							
Hsg Rehab	2336 - 23rd	$10,690.24							making principal pmts
Hsg Rehab	1515 Main	$22,980.00							
Hsg Rehab	1523 Treasch	$7,326.00							
Hsg Rehab	1989 Germaine	$5,000.00							
Hsg Rehab	507 Broad	$5,000.00							
Hsg Rehab	1628 Union						$13,676.09		ordered 11/02
Hsg Rehab	427 Jennings						$19,932.00		plus10% 12/01/court costs
Hsg Rehab	2851 - 12th				$16,878.00				Owner Dec'd-cancels judgement
Hsg Rehab	2210 Wichert				$12,833.69				Owner Dec'd-cancels judgement
Econ Dev	AG Print Promo					$5,000.00			5 yrs
Econ Dev	Adv Cryo Ent			$135,022.12					Pmts current
Econ Dev	Adv Cryo Svcs			$60,028.03					Pmts current
Econ Dev	Bark at Home			$46,381.49					Pmts current
Econ Dev	Bark-n-Play			$60,028.03					Pmts current
Loan Totals		$1,160,286.83	$275,930.33	$368,421.46	$44,896.69	$58,066.72	$37,908.09	$35,165.26	

11.) Lump Sum Agreements

The City of Cuyahoga Falls has no lump sum agreements at this time.

12.) Housing Rehabilitation

This information is contained in the narrative on pages 1 – 4 as well as the following table.

2010 Housing Activities at a Glance

Activity	Accomplishment	Funds Expended
Emergency Grants	5	$12,277.15
Rehab Loans	8	$98,311.00
Matching Grants	37	$279,280.76
Paint Reimbursements	14	$3,475.86
Down Payment Assistance	4	$12,000.00

In FY 2010, the Matching Grant Program leveraged private funds to carry out the program, as it is a 50% match. The total private funds invested were $261,345.95.

13.) Neighborhood Revitalization Strategies

The City of Cuyahoga Falls does not have any approved Neighborhood Revitalization Strategies.

Antipoverty Strategy

1. *Describe actions taken during the last year to reduce the number of persons living below the poverty level.*

Funding Year 7 CAPER Antipoverty Strategy response:

The City of Cuyahoga Falls, as stated in the Consolidated Planning process, continues its efforts to reduce the number of families and individuals living in poverty. Eliminating poverty is a concern of the City and we are working to improve the quality of life and economic well being of the residents through our housing programs and economic development programs. The City works to maximize federal funds received to target those individuals in the community who have traditionally not been served or are underserved by other programs. Any opportunities to partner with existing programs that address housing, education, and job needs of persons in poverty will be evaluated, and if possible, funded by the City of Cuyahoga Falls. The Community Development Department focuses on the attraction and retention of businesses to maintain and improve employment opportunities within the community.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

1. *Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).*

Funding Year 7 CAPER Non-homeless Special Needs response:

The special needs populations include but are not limited to the elderly and persons with disabilities. They are at an increased risk for losing independence. As evidenced by the housing programs, this population also has a high incidence of housing problems related to either cost burden or condition. The housing programs continues to assist the special needs populations in order to maintain their independence and in some cases preventing homelessness and improve the living conditions.

Specific HOPWA Objectives

1. *Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives*
   Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:

a. *That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;*
b. *That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;*
c. *That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;*
d. *That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;*
e. *That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,*
f. *That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.*

2. *This should be accomplished by providing an executive summary (1-5 pages) that includes:*
   a. *Grantee Narrative*
      i. *Grantee and Community Overview*
         (1) *A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services*
         (2) *How grant management oversight of project sponsor activities is conducted and how project sponsors are selected*
         (3) *A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS*
         (4) *A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body*
         (5) *What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations*
         (6) *Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.*
      ii. *Project Accomplishment Overview*
         (1) *A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences*
         (2) *The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds*
         (3) *A brief description of any unique supportive service or other service delivery models or efforts*
         (4) *Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.*

      iii. *Barriers or Trends Overview*
         (1) *Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement*
         (2) *Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and*
         (3) *Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years*
   b. *Accomplishment Data*
      i. *Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).*
      ii. *Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).*

Funding Year 7 CAPER Specific HOPWA Objectives response:

Not applicable. The City of Cuyahoga Falls does not receive HOPWA funds.

OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Funding Year 7 CAPER Other Narrative response:

CDBG-R funding was allocated in the following manner:

- 70% or $132,490 to the Watermark – containing senior housing
- 30% or $56,780 to SSB demolition of an abandoned building

However, we were able to reduce our anticipated costs for demolition of the abandoned building to $48,475 and increase our funding assistance to aid in the construction of senior housing to 74.4% of our allocation or $140,795.

Attachments

1. Location Map of Accomplishments
2. PR03
3. PR06
4. PR10
5. PR23
6. PR26
7. Section 3 Report
8. Race and Ethnic Data Report
9. Fair Housing Action Plan