

Executive Summary

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

1. Introduction

The City of Bloomington will utilize Community Development Block Grant (CDBG) funds to achieve a number of goals that best serve the citizens of Bloomington. The City will use its entitlement funds to achieve the goals/outcomes that are identified within this plan. The City has incorporated performance measures into the Consolidated and Action Plan to ensure that the Plan is results orientated and that it meets its one and five year goals. The planned activities serve a large number of low/moderate income households. Overall, at least 80 percent of the grant will be expended on activities for low/moderate income households in Bloomington.

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.

The City will carry out activities that will provide for the preservation of the City's housing stock, provide essential services to seniors and to support Fair Housing activities.

The activity to receive the largest amount of funding is the single-family rehabilitation program which serves low/moderate income homeowners with low interest loans to repair/update their homes. The rehabilitation loan program is coupled with the lead based paint activity to assist in the abatement of lead hazards in pre-1978 homes utilizing CDBG funds. In this way, the City is ensuring that no threats remain to the health of occupants from lead paint. This activity serves low/moderate income households at or below 80% median.

The City will provide CDBG funds to Senior Community Service's Household and Maintenance for the Elderly (H.O.M.E.) Program to provide outside maintenance and home making services to low/moderate income seniors. This is an important service that allows seniors to continue to reside in their homes.

The City will also fund the West Hennepin Affordable Housing Land Trust (WHAHLT), dba: Home within Reach, to complete two purchase two homes per program year to rehab and re-ell to an income qualified first-time homebuyer.

Lastly, the City contributes to the Fair Housing implementation Council (FHIC) for Fair Housing Services. The City will allocate funds for the continuation of Fair Housing Services in suburban the metro (including Bloomington). These funds may be used for education and research, housing discrimination testing and enforcement and Fair Housing counseling and clearinghouse activities.

3. Evaluation of past performance

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

The City has a long history of actively working to preserve and upgrade the condition of its' neighborhoods. The CDBG-funded single-family rehabilitation loan program (including lead-based paint abatement) have been a very successful and important part of these efforts.

In addition, the has a City's long-standing commitment to serving its' senior population. The CDBG funded H.O.M.E. program through Senior Community services has been a very successful and important part of these efforts. The City will continue this activity given the strong need in the community and the past performance of Senior Community Services.

Fair Housing continues to be a focus of the City of Bloomington. Past funding has provided for pared testing, among other activities that are coordinated by the lead agency of the consortium, Hennepin County. The City, as part of the consortium, focuses this activity based upon the results of the Analysis of Impediments that is completed by the metro-wide efforts of the Fair Housing Implementation Council (FHIC).

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The public comment period ends on April 30, 2021.

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 public comment period ends on April 30, 2021.

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

7. Summary

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	BLOOMINGTON	Housing and Redevelopment Authority (HRA)

Table 1 – Responsible Agencies

Narrative

The City of Bloomington is a CDBG only entitlement community. Bloomington is also a member of the HOME consortium of suburban Hennepin County. Therefore, the County serves as the lead agency in the overall development and submittal of the Consolidated Plan for participating jurisdictions, including CDBG only grantees.

Consolidated Plan Public Contact Information

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

1. Introduction

The development of the Hennepin County Consortium Consolidated Plan was led by Hennepin County. Because many of the agencies that work within the city also work county-wide, it was determined that only one contact needed to be made to these organizations. The responses below in this section reflect the work completed by Hennepin County and outlined in the overall Consortium Consolidated Plan, as well as outreach completed by the City of Bloomington.

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

These activities are coordinated by Hennepin County at the local level. Where appropriate, the city may refer organizations and services agencies to each other to coordinate efforts.

In addition, the city's HRA operates a Housing Choice Voucher program of 551 units that serves a wide variety of low-income populations, including elderly, the disabled and families. The HRA's staff is trained to assist participants to connect with services such as mental health and public health services.

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.

This coordination is completed by the Minneapolis/Hennepin County Continuum of Care and the Office to End Homelessness. In addition, the City, through its Human Services Division, provides essential referrals to homeless persons to connect them to services.

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

Not applicable Bloomington does not receive ESG funds. Please refer to the Hennepin County section on this.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Senior Community Services (SCS)
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency's Executive Director and other staff participated in work groups on the plan coordinated by Hennepin County.
2	Agency/Group/Organization	City of Bloomington - Communications Division
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy broadband services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consulted with the Director of the Communications Division on the Broadband needs of Bloomington residents. The Division has jurisdiction over the vendors who supply broadband internet services within the city, including cable and phone-based ISPs.

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

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	Hennepin County	The Office to End Homelessness has played a key role in the development of all housing and homeless-related sections of the plan. Coordination will continue throughout the plan.
City of Bloomington Comprehensive Plan	City of Bloomington	The city's comprehensive plan lays out development of the city for the next 30 years. It also identifies affordable housing efforts within the city, which may be impacted by the city's CDBG efforts.

Table 3 - Other local / regional / federal planning efforts

Narrative

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

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

Public comment period is open until April 30, 2021.

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	<p>The City of Bloomington's City Council will hold a public hearing at 6:00 p.m. on April 12, 2021 to accept comments on development of the plan and to recommend the plan for approval to HUD and Hennepin County, the lead agency of the consortium. Notice of the hearing was published ten or more days prior to the hearing. The City Council's meeting dates, times and agendas are made available on the City's website: www.BloomingtonMN.gov, including the plan or summary of the plan.</p>			

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)
2	Newspaper Ad	Non-targeted/broad community	<p>The City of Bloomington's City Council will hold a public hearing at 7:00 p.m. on April 12, 2021 to accept comments on the development of the plan and to recommend the plan for approval to HUD and Hennepin County, the lead agency of the consortium. Notice of the hearing was published ten or more days prior to the hearing. The City Council's meeting dates, times and agendas are made available on the City's website: www.BloomingtonMN.gov, including the plan or summary of the plan. The meeting will be held virtually due to the COVID-19 pandemic.</p>			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Meeting	Non-targeted/broad community	As the lead agency, Hennepin County hosting a public hearing before its Board of Commissioners on April 13, 2021. The hearing will be held virtually due to the COVID-19 pandemic.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Bloomington intends to pursue all resources available to address is planned 2021 program year activities. The following list provides information on CDBG and other funds used for community development and housing programs within the City.

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	458,378	400,000	250,000	1,108,378	3,373,894	The City of Bloomington is an entitlement jurisdiction for the Community Development Block Grant Program. Program income is from the repayment of single-family rehabilitation loans. Prior year resources is the estimated amount of unspent CDBG funding carried over into the new program year.
Section 108	public - federal	Housing	0	0	0	0	2,000,000	Section 108 loan for preservation or creation of affordable rental housing.

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 of Bloomington intends to pursue all possible resources to address its Consolidated Plan goals. There are no specific matching requirements associated with Bloomington's CDBG program, although any opportunities to provide/obtain matching funding will be pursued

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

The City of Bloomington's HRA owns 41 single-family rental homes that provide affordable housing to larger families. Twenty of the homes are part of the HRA's Housing Choice Project-Based Voucher program. The other twenty-one homes make up the HRA's Rental Homes for First-Time Home Buyers program. This program assists renters achieve the goal of homeownership through an escrow feature. The City is also in the process of developing an inventory of publically owned land to determine future uses.

Discussion

The City of Bloomington will utilize a variety of federal, state and local funding to achieve the goals identified in this plan. This includes sources used on a recurring basis, including CDBG, Housing Choice Vouchers and HRA levy funds. Additional sources such as LIHTC, TIF and housing revenue bonds have been used on a case by case basis in the past and will continue to be pursued when and where appropriate

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Create Single Family Home Ownership	2020	2024	Affordable Housing		Rehabilitation of Existing Units West Hennepin Affordable Housing Land Trust	CDBG: \$842,998	Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 30 Household Housing Unit
3	Senior and Public Services	2020	2024	Non-Homeless Special Needs		Public Services	CDBG: \$20,000	Other: 100 Other
4	Fair Housing Activities	2020	2024	Fair Housing Activities			CDBG: \$5,000	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Preserve and Create Single Family Home Ownership
	Goal Description	
3	Goal Name	Senior and Public Services
	Goal Description	

4	Goal Name	Fair Housing Activities
	Goal Description	

AP-35 Projects - 91.420, 91.220(d)

Introduction

Activities that will be undertaken during 2021 will address priority needs and local objectives. The activities that are part of the 2021 Action Plan are to be completed within the program year. Of the total grant of \$458,378 the City will use \$363,378 or 79% of the grant to serve low and moderate income activities. The balance of funds is used for Fair Housing activities and administration expenses.

#	Project Name

Table 7 – Project Information

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

The City has selected a variety of activities to meet the needs of our community. These include the preservation of our housing stock through the single-family rehabilitation loan program, removal of lead-based paint hazards, providing seniors with essential services to enable them to remain in their homes, fair housing activities and the providing affordable home ownership opportunities through the land trust. The City serves other needs of the community with its own resources, including over \$100,000 provided annually to other social service providers in the community.

AP-38 Project Summary
Project Summary Information

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

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

All CDBG activities will be offered city-wide in the City of Bloomington

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

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

Introduction

The City of Bloomington has a long track record supporting new and existing affordable housing within the City. The Bloomington HRA operates a Housing Choice Voucher Program (Section 8) that assists 551 households each month. The HRA also provides affordable rental opportunities through the 41 rental homes that are owned and managed by the HRA. The city/HRA has also partnered with private and non-profit developers for development of new affordable housing. Most recently in 2019, the HRA provided assistance for the development of 42 affordable units through the low-income housing tax credit program with a private developer. In addition, the HRA will assist with the development of 40 Low-Income Housing Tax Credit units at Lyndale Flats.

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

In February 2019, the City adopted an Opportunity Housing Ordinance to promote the development of affordable housing in the City. This comprehensive ordinance includes incentives and goals for the development of affordable housing units. More information on the ordinance and other City affordable housing initiatives can be found at: <https://www.bloomingtonmn.gov/cd/affordable-housing-preservation-and-creation>

The greatest barrier that the City experiences to the development of new affordable housing is the lack of available and/or affordable land. The City, through its HRA, meets frequently with developers of affordable housing who are seeking to create new affordable housing within the City. Bloomington is a built-out city and any new affordable housing will be redevelopment project, which adds significant costs to a project. The HRA is exploring different ways to assist in the land acquisition process for affordable housing, however, greatly diminished eminent domain powers limit the HRA's ability to assemble the multiple parcels needed for most projects.

Discussion

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

Introduction

Despite limited funding, Bloomington's CDBG program is designed to meet a wide range of needs, including services for seniors, fair housing activities, housing rehabilitation and reducing lead-based paint hazards. The City works with a variety of public, non-profit, and private industry partners to accomplish its community development goals, both through the CDBG program and through other resources.

Actions planned to address obstacles to meeting underserved needs

The City will continue to identify obstacles, such as lack of affordable housing, to unmet and underserved community needs and support the goals established in the 2020-2024 Consolidated Plan. The City's approach to meeting these affordable housing needs is to provide affordable housing opportunities includes the City's HRA and the Housing Choice Voucher program. In addition, to preserve and expand the supply of decent, safe, and affordable housing, the City will provide financial assistance for rehabilitation and repair of owner-occupied units to low to moderate income families. Other activities that would meet unmet needs not addressed by our limited CDBG funding will be identified and other resources may be sought to meet the need.

The City has chosen activities that best serve the needs of the Citizens of Bloomington, given limited funding of the CDBG Program.

Creating additional affordable housing is inhibited by the lack of vacant land. All housing development will occur as redevelopment, driving the land acquisitions costs to an extremely high level. The real estate market has become over-heated in the last few years, thus land acquisition costs in Bloomington remain high. Additional decline in dollars from other funders also inhibits the amount of affordable housing which can be either preserved or created.

In 2019 the the City passed an Opportunity Housing Ordinance (OHO) that provides requirements and incentives for the development of affordable housing in the city. This ordinance also created a housing trust fund to assist with the financing of future affordable housing units. This ordinance offers great incentives to developers for the creation of units at 50% AMI and 30% AMI, to help serve those hardest to reach households.

in 2017 the HRA established a Naturally Occurring Affordable Housing (NOAH) fund to preserve NOAH units in the city. Since its creation, the fund has assisted with the preservation of over 700 NOAH units

in the city.

Actions planned to foster and maintain affordable housing

The biggest affordable housing activity that the Bloomington HRA manages is our 551 unit Housing Choice Voucher program. This important community resource assists 551 families every month. These families include elderly, disabled and single-parent households.

In addition, the Bloomington HRA owns 20 single-family homes in our Assisted Rental Housing Program. The units maintain their affordability through the HRA's action to project-base 20 vouchers from its tenant-based Section 8 program in these units. Originally, the units were part of the HRA's Public Housing program, which ended in 2012. The HRA's Public Housing program was developed in 1995; however the program failed to be self-supporting. The HRA had to provide additional funding over several years to cover shortfalls in the Public Housing program. This use of local levy funds to support this federal program was necessary as a result of several years of reduced funding by HUD. The HRA received approval from HUD to terminate its Public Housing program and transfer the units to the Section 8 Housing Choice Voucher program.

In addition, the City of Bloomington's HRA currently has 21 single-family homes in its Rental Home for First-Time Home Buyers program. This program was originally funded by Hennepin County HOME funds. This program serves families that are making the transition from renting to owning their own home. The program escrows a portion of their monthly rent for future use as a down payment on the purchase of a home.

The Bloomington HRA is responsible for maintenance and management of all 41 of the above single-family affordable rental units.

The HRA used its own levy funds to assist in funding the land acquisition for the development of 42 new units of affordable tax-credit rentals. The HRA sold the land at a reduced cost to MWF to increase the affordability of the project. The affordability of these tax-credit apartments will provide additional needed workforce housing in the City. The project will be completed and lease up in 2020.

In 2019 the City passed an Opportunity Housing Ordinance (OHO) that provides requirements and incentives for the development of affordable housing in the city. This ordinance also created a housing trust fund to assist with the financing of future affordable housing units.

In 2017 the HRA established a Naturally Occurring Affordable Housing (NOAH) fund to preserve NOAH units in the city. Since its creation, the fund has assisted with the preservation of over 700 NOAH units

in the city.

Actions planned to reduce lead-based paint hazards

The City will continue to comply with all requirements of Title X-Residential Paint Hazard Reduction Act of 1992. Additionally, the Bloomington HRA is using a portion of the CDBG funds for lead abatement activities in its Section 8 Rent Assistance Program and CDBG Single Family Rehabilitation Loan Program. The Bloomington HRA also informs all tenants participating in the Section 8 Program, public housing and rental home program of potential hazards of lead paint.

All recipients of rehabilitation funds must have a lead paint inspection performed on their home prior to receiving a loan. Any lead that is found must then be abated using CDBG funds. The Bloomington Public Health Department also makes referrals for testing when cases of lead poisoning are suspected.

The Bloomington HRA also keeps Section 8 landlords up to date regarding lead paint through its quarterly Rental Collaborative meetings.

The Bloomington HRA has two staff people who are trained lead inspectors and risk assessors. The Bloomington HRA provides CDBG funding to owners of rental property with Section 8 households with children below the age of six where the units will have to be tested for lead. Also, all of their Single Family rehabilitation activities (approximately 35 units) through the CDBG Program will have to be assessed and abated of lead paint.

Collaborative efforts: The City of Bloomington's Public Health Division advises the staff of the HRA of any known persons with lead poisoning who may be seeking services from the HRA/CDBG funded activities. In addition, the City partners with Hennepin County to provide lead paint abatement services for single-family rehabilitation clients whose family composition qualifies.

Actions planned to reduce the number of poverty-level families

The HRA provides affordable housing to poverty-level families through its Housing and Redevelopment Authority. This stable housing offers families and individuals the structure necessary to work on their income issues, such as education, new jobs and other important factors to overcome poverty

In 2019 the the City passed an Opportunity Housing Ordinance (OHO) that provides requirements and incentives for the development of affordable housing in the city. This ordinance also created a housing trust fund to assist with the financing of future affordable housing units. This ordinance offers great incentives to developers for the creation of units at 50% AMI and 30% AMI, to help serve those hardest to reach households.

in 2017 the HRA established a Naturally Occurring Affordable Housing (NOAH) fund to preserve NOAH units in the city. Since its creation, the fund has assisted with the preservation of over 700 NOAH units

in the city for households at or below 60% AMI.

Actions planned to develop institutional structure

The City of Bloomington has and will continue to coordinate with other institutions in the delivery of housing and community development programs. For example, in the past, the City has partnered with the StuartCo, MWF, Aeon, Sherman & Associates and Sand Companies for the development of new affordable and/or accessible housing.

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

The city of Bloomington has its own Housing and Redevelopment Authority. The HRA manages the CDBG program for the City and the two entities work closely together to achieve shared goals. In addition the HRA manages 551 units of affordable housing through its Housing Choice Voucher program. This important community resources assists 551 families every month. These families include elderly, disabled and single-parent households.

In addition, the Bloomington HRA owns 20 single-family homes in our Assisted Rental Housing Program. The units maintain their affordability through the HRA's action to project-base 20 vouchers from its tenant-based Section 8 program in these units. Originally, the units were part of the HRA's Public Housing program, which ended in 2012. The HRA's Public Housing program was developed in 1995; however the program failed to be self-supporting. The HRA had to provide additional funding over several years to cover shortfalls in the Public Housing program. This use of local levy funds to support this federal program was necessary as a result of several years of reduced funding by HUD. The HRA received approval from HUD to terminate its Public Housing program and transfer the units to the Section 8 Housing Choice Voucher program.

In addition, the City of Bloomington's HRA currently has 21 single-family homes in its Rental Home for First-Time Home Buyers program. This program was originally funded by Hennepin County HOME funds. This program serves families that are making the transition from renting to owning their own home. The program escrows a portion of their monthly rent for future use as a down payment on the purchase of a home.

The Bloomington HRA is responsible for maintenance and management of all 41 of the above single-family affordable rental units.

The HRA coordinates social service efforts with the Parks & Recreation, Community Outreach and Engagement and Public Health divisions. Parks & Recreation is the primary City division that delivers or coordinates services with outside entities for seniors, low income families, disabled individuals and

others in the community. Public Health provides WIC and other essential services to the community.

Discussion

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

Discussion

