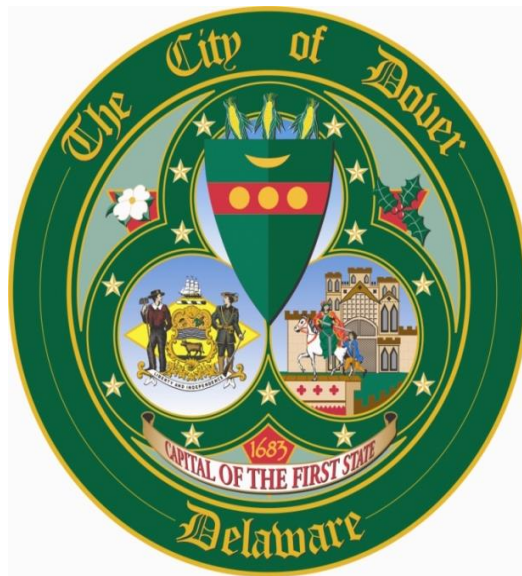


# City of Dover, Delaware

FY 2015 -2019 Five Year Consolidated Plan



**Prepared by:**

**The City of Dover Planning & Community  
Development Office**

**May 11, 2015**

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## **Executive Summary**

### **ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

Dover, the Capital of Delaware, is centrally located in the state and is part of the Mid-Atlantic region. The City is located approximately 90 miles from both Philadelphia and Washington, D.C. Dover's population ranks second only to Wilmington, Delaware. Delaware and the Eastern Shore counties of Maryland and Virginia comprise the Delmarva Peninsula. Dover is also the largest city in land area on the peninsula with a total land area of over 23 square miles.

The Consolidated Plan (2015-2019) is a five year plan mandated by the United States Department of Housing and Urban Development (HUD). This plan identifies the specific needs concerning affordable housing, homeownership, housing rehabilitation, homelessness and community development needs such as public service needs. The strategic plan element of this plan specifies the goals identified in the preparation of this plan and includes the four goals that the Consolidated Plan revolves around. These goals in order of priority are:

1. Provide aid to special needs persons.
2. Preserve the existing housing stock.
3. Encourage owner occupied housing in low to moderate income areas.
4. Provide safe and livable neighborhoods.

The Action Plan component of the Plan specifies how the projects will further these goals for fiscal year 2015.

#### **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The Consolidated Plan requires the City to assess its housing and homeless needs, needs assessment and housing market analysis. These needs will be discussed further in the Consolidated Plan. The following summary will identify the objectives and outcomes of these needs utilizing CDBG funds. The three objectives to be carried out over the next five years are

to: provide decent affordable housing by assisting homeless persons or those at risk of becoming homeless obtain affordable housing; provide suitable living environments by improving the quality of owner occupied housing through the homeowner and emergency repair programs, and expand economic opportunities by working with the local housing authority to provide homeownership assistance to federally assisted residents to empower self-sufficiency to low income persons. The three outcomes that will support the objectives over the next five years consist of increasing availability/accessibility, increase affordability and improve sustainability.

### **3. Evaluation of past performance**

The City elected to implement multi-year grants for the 2010-2014 Consolidated Plan within the third year of the plan based on community development needs that were identified in the planning process of the Consolidated Plan. These needs included homeownership assistance, assisting the homeless, homeowner rehabilitation, public facility improvements and general public service needs. These needs have been consistent in the City of Dover since the City became an entitlement in 1995.

Within the last three years, emergency home repairs were completed on 50 owner occupied homes, 15 housing units were rehabilitated, and 21 low to moderate income persons received homeownership assistance to purchase affordable housing in the City.

The City continues to meet the timeliness standard for expenditures of funds in a timely manner and continues to obligate over the 70% requirement of CDBG funds on activities that benefit low to moderate persons.

### **4. Summary of citizen participation process and consultation process**

A minimum of two public hearings are required. Adequate notice is given through advertisement in the City's local newspaper and the City's website, with copies of the notices sent to such service agencies and public housing administration offices who serve and advocate for the low and very low income persons and disability communities to encourage citizens participation input by the citizens and their advocates to meet the needs of citizens and particularly those who are beneficiaries of the programs covered in the Consolidated Plan. The draft plan will be available for review for 30 days. The draft plan was made available for review on April 1, 2015. The public hearing to comment on the draft Consolidated Plan was held on April 21, 2015.

The City will consider any comments or views of citizens or units of local government received in writing, or orally at public hearings, meetings, etc., in preparing the City's final Consolidated Plan and Annual Action Plan. A fifteen-day period will be set aside for comments. A summary

of these comments and responses shall be attached to the final Consolidated Plan amendment of the plan or Performance Report.

**5. Summary of public comments**

No written comments were received during the 30-day public review period for the Consolidated Plan and the 2015 Action Plan.

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

There were no comments that required a formal response.

**7. Summary**

Delaware State Housing Authority initiated statewide citizen participation and stakeholder outreach participation that included all of the HUD CDBG entitlement communities in Delaware. The outreach included public hearings, stakeholder interviews and a web-based community needs survey. The web based survey was available for six weeks and heavily publicized on flyers and distributed throughout the state. On November 12, 2014, the City of Dover conducted its first public hearing to determine the community development needs in the City of Dover. Attached are the results of the survey and comments from the public hearing. The priority needs for the City of Dover include initiatives to assist the homeless and rehabilitation activities involving rental housing units.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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	DOVER	Planning/ City of Dover

Table 1 – Responsible Agencies

### Narrative

The Community Development Office is a part of the Department of Planning and Community Development in the Public Services Department. The Community Development Office has one full time employee, a Planner, who administers the CDBG Grant and is the Fair Housing Coordinator. Clerical, planning and inspection assistance is provided by the Planning and Inspections Department. The Building Inspections Office also provides housing and life safety inspections throughout the City including property maintenance. The Dover Housing Authority provides responsibility for the public housing needs within the City and is a separate entity from the City. The Delaware State Housing Authority who operates both Section 8 vouchers and public housing units also caters to the housing needs of low-moderate income families.

### Consolidated Plan Public Contact Information

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## 1. Introduction

The public participation events planned for the Consolidated Plan (2015-2019) represent the culmination of decades of experience in conducting similar events. In addition to the normal advertising of meetings in the local press, the staff notified stakeholders in writing and by the internet. The public was also notified of all meetings and hearings.

Two public hearings are required. Adequate notice is given through advertisement in the City's local newspaper and the City's website. Copies of the notices are sent to service agencies and public housing administration offices that serve and advocate for the low and very low income persons and disability communities to encourage citizen participation input by the citizens and their advocates, meet the needs of citizens and particularly those who are beneficiaries of the programs covered in the Consolidated Plan.

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

Development of the Consolidated Plan has involved several months of effort and coordination by gathering members of the community, state and local housing authorities and various state and county agencies within the State of Delaware to consult on topics regarding homelessness, persons with disabilities, elderly, persons with HIV/AIDS, services for children and housing needs. The following is a list of agencies that the City of Dover consulted with in preparing the Consolidated Plan:

- Homeless Planning Council
- Delaware State Housing Authority
- Dover Housing Authority
- City of Dover Planning Department
- State of Delaware Department of Health and Social Services
- Delaware HIV Consortium
- State of Delaware Division of Family Services
- Central Delaware Habitat for Humanity
- Milford Housing Development Corporation
- City of Dover Economic Development Office
- City of Dover Department of Public Works
- City of Dover City Manager's Office



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

The Homeless Planning Council is the coordinator of the Continuum of Care (CoC) for the State of Delaware. City planning staff is a designated member of the Delaware Interagency Council of Homelessness and will continue to support the need of ending chronic homelessness by actively collaborating with housing providers that service the homeless and those that are at risk of homelessness.

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

Not applicable, the City of Dover does not receive ESG funds.

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

The citizen participation process for the 2015-2019 Consolidated Plan began in the fall of 2014 which was initiated with a collaborative effort with Delaware State Housing Authority (DSHA), New Castle County and the City of Wilmington conducting a series of state-wide public hearings to determine the needs in each jurisdiction. An online statewide Community Development needs survey was developed by DSHA and available for all the jurisdictions to seek additional needs and priorities from citizens in their communities.

During the City's first public hearing, staff from Central Delaware Habitat for Humanity and Milford Housing Development Corporation provided their input regarding community development needs in Dover.

**Table 2 – Agencies, groups, organizations who participated**

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

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care (CoC)	Homeless Planning Council of Delaware	The City of Dover includes funding for homeless programs as a priority in its Strategic Plan that are in line with the needs and priorities with the CoC.
Analysis of Impediments to Fair Housing	Delaware Statewide Entitlement Jurisdictions	The Strategic goals include the promotion of fair housing for all, preserving the existing stock and providing affordable housing.
10 Year Plan to End Homelessness	Homeless Planning Council of Delaware	The Consolidated Plan's priorities for ending homelessness are in line with the goals of the 10 Year Plan.
Restoring Central Dover Initiative	NCALL Research Inc.	Strengthen existing housing and expanding homeownership for low income persons are consistent with the goals in the Consolidated Plan
Downtown Development District Program	Delaware State Housing Authority	Strengthen neighborhoods and build a stable community of long term residents are consistent with the goals of the Consolidated Plan

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The City consulted with the State and local housing authorities in determining the needs of the community through the public participation process and addressing the needs of affordable housing within the City.

**Narrative (optional):**

## **PR-15 Citizen Participation**

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

The City of Dover's Consolidated Plan Citizen Participation Plan (CPP) has been prepared by the City of Dover in accordance with the requirements contained in Part 9115 of Title 24 of the Code of Federal Regulations. The CPP outlines the various methods the City will use to inform its citizens of, and actively involve them in developing the Consolidated Plan.

The Consolidated Plan serves as the housing and community development planning document of the City and its application for funding under the current Community Planning and Development (CDP) formula program CDBG.

Through public hearings, stakeholder interviews and the web based community needs survey, goals were formulated by participants identifying priority needs for the five year Consolidated Plan.

A minimum of two public hearings are required to allow the public an opportunity to comment on the Consolidated Plan, Annual Action Plan and the Consolidated Annual Performance Evaluation Report (CAPER). Adequate notice is given through advertisement in the City's local newspaper, and copies of the notices are sent to such service agencies and public housing administrative offices who serve and advocate for the low and very low income persons and disability communities to encourage citizens participation input and meet the needs of the citizens who are beneficiaries of the program covered in the Consolidated Plan.

The Draft Plans are made available for review and comments for 30 days at City offices and on the City's website. The City will consider any comments or views received in writing or orally and a summary of any views or comments not accepted and the reason therefore shall be attached to all final reports.

## 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	2nd public hearing was held on the Draft Consolidated Plan and Annual Action Plan			
2	News Paper Ad	Non-targeted/broad community	Notice of Availability of Draft Consolidated Plan and Annual Action Plan			
3	Internet Outreach	Non-targeted/broad community	Notice of Availability of Draft Consolidated Plan and Action Plan			<a href="http://www.cityofdover.com">www.cityofdover.com</a> community development
4	Public Hearing	Non-targeted/broad community	City of Dover 1 <sup>st</sup> Public Hearing on housing and community development needs	Summary of comments attached		
5	Internet Outreach	Non-targeted/broad community	Online Survey for housing and community development needs for Dover	Summary of comments attached		<a href="http://www.cityofdover.com">www.cityofdover.com</a> community development

**Table 4 – Citizen Participation Outreach**

## **Needs Assessment**

### **NA-05 Overview**

#### **Needs Assessment Overview**

The Delaware State Housing Authority completed the 2015-2020 Needs Assessment for the State of Delaware in the summer of 2014. The Needs Assessment addresses the most pressing housing issues and provides an estimate for future demand between 2015 and 2020. Because Delaware has a variety of housing markets, the study identifies housing needs within neighborhoods and market areas throughout the State, County and major cities within Delaware including Dover.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

A total of 39.4% of all households in the City of Dover are 80% and below the HUD Area Median Family Income (HAMFI): 13.7% of households have incomes between 0% and 30% of the HAMFI; 12.5% of households have incomes between 30% and 50% HAMFI, and 13.1% of households have incomes between 50% and 80% HAMFI. Over 42% of households in the City spend more than 30% of their income on rent/mortgage and utilities that are suffering a cost burden. The housing cost burden is extremely difficult for very low income households that are between 0% and 30% HAMFI because over 60% of this population spends more than 50% of their income on housing.

Demographics	Base Year: 2000	Most Recent Year: 2011	% Change
Population	32,135	35,849	12%
Households	12,460	12,603	1%
Median Income	\$38,669.00	\$47,754.00	23%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	1,730	1,575	1,650	1,700	5,945
Small Family Households *	560	320	855	630	3,030
Large Family Households *	245	110	110	165	430
Household contains at least one person 62-74 years of age	365	335	260	195	1,220
Household contains at least one person age 75 or older	235	390	280	195	500
Households with one or more children 6 years old or younger *	625	275	290	329	530
* the highest income category for these family types is >80% HAMFI					

**Table 6 - Total Households Table**

**Data Source:** 2007-2011 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	10	0	10	0	20	15	0	0	15	30
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	10	0	0	10	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	0	0	4	0	4	70	0	10	40	120
Housing cost burden greater than 50% of income (and none of the above problems)	895	480	145	0	1,520	105	320	85	60	570
Housing cost burden greater than 30% of income (and none of the above problems)	125	210	315	330	980	30	115	310	245	700

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	80	0	0	0	80	35	0	0	0	35

**Table 7 – Housing Problems Table**

Data 2007-2011 CHAS  
Source:

## 2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	905	490	160	0	1,555	190	320	95	115	720
Having none of four housing problems	480	425	600	945	2,450	35	340	795	640	1,810
Household has negative income, but none of the other housing problems	80	0	0	0	80	35	0	0	0	35

**Table 8 – Housing Problems 2**

Data 2007-2011 CHAS  
Source:

## 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	410	210	360	980	30	75	250	355
Large Related	125	35	10	170	95	4	20	119
Elderly	215	170	19	404	64	200	60	324
Other	285	280	80	645	30	150	65	245
Total need by income	1,035	695	469	2,199	219	429	395	1,043



**Table 9 – Cost Burden > 30%**

Data 2007-2011 CHAS  
Source:

**4. Cost Burden > 50%**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	370	125	120	615	20	75	40	135
Large Related	100	35	0	135	35	0	0	35
Elderly	150	120	4	274	29	105	15	149
Other	285	210	20	515	30	135	30	195
Total need by income	905	490	144	1,539	114	315	85	514

**Table 10 – Cost Burden > 50%**

Data 2007-2011 CHAS  
Source:

**5. Crowding (More than one person per room)**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	0	10	4	0	14	70	0	10	25	105
Multiple, unrelated family households	0	0	0	0	0	0	0	0	15	15
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	0	10	4	0	14	70	0	10	40	120

**Table 11 – Crowding Information – 1/2**

Data 2007-2011 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

## Table 12 – Crowding Information – 2/2

Data Source  
Comments:

### **Describe the number and type of single person households in need of housing assistance.**

The 2014 Point in Time Study conducted by the Homeless Planning Council indicates there were 26 individuals who were in Transitional Housing, 119 individuals in Emergency Shelters, and 10 individuals in Permanent Supportive Housing. As of April 2014, Housing needs for single person households on the Dover Housing Authority Public Housing waiting list indicates 101 individuals were in need of 0 Bedroom which is efficiency, and 74 individuals were in need of a 1 bedroom.

### **Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Based on 2014 data from Dover Housing Authority, there were 21 families with disabilities on the Section 8 waiting list, and 39 families with disabilities on the Public Housing waiting list. There was no data available for victims of domestic violence, dating violence and sexual assault and stalking.

### **What are the most common housing problems?**

The most common housing problem in Dover is the cost burden where 57% households that are 0-30% of the Area Median Income (AMI) are paying greater than 50% of their income on housing; and over 42% of all households in the city spend more than 30% of their income on housing and utilities and suffering a cost burden. This population is at risk of becoming homeless with very little left to purchase food and clothing. Delaware is the 10<sup>th</sup> highest in the country with the highest two-bedroom housing wage in Kent County at \$19.04 based on data from the National Low Income Housing Coalition. A two-bedroom fair market rent in Kent County is \$990.00 which makes it impossible for individuals earning less than \$19.04 an hour to afford a modest two bedroom apartment in Kent County. Secondly, the data reported an estimated 61% of Delaware renters cannot afford a two-bedroom apartment in the county they live in.

### **Are any populations/household types more affected than others by these problems?**

Households that are elderly, persons with disabilities and low income veterans carry the highest burden with very few affordable housing units available. This population is on a fixed income and is suffering from a severe housing cost burden. A disabled person dependent on SSI cannot afford an efficiency apartment in the State of Delaware.

### **Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the**

**needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Households that are at 30% and below the area median income are at imminent risk of becoming homeless. These populations, particularly single parent households with children have a greater need for affordable housing and additional supportive services. Due to the average Fair Market Rent of \$990.00 in Kent County for a two bedroom apartment, affordable housing is impossible for this population unless they have a Housing Choice Voucher or reside in Public Housing.

It will be especially difficult for families receiving rapid re-housing and that were formerly homeless to maintain affordable housing if they are not gainfully employed. Often the homeless population suffers from substance abuse, mental illness and incarceration. It is important for this population to receive case management and assistance from social service agencies to prevent recidivism and relapses from substance abuse.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The criteria for defining “at-risk of homelessness” per HUD guidelines is an individual or family who: (1) has an annual income below 30% of the median family income for the area; and (2) does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; and (3) meets one of the following conditions: (a) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; or (b) is living in the home of another because of economic hardship; or (c) has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; or (d) lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; or (e) lives in severely overcrowded housing; or (f) is exiting a publicly funded institution or system of care; or (g) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

For households and individuals that are 30% and below the area median income and pay more than 50% their income for housing will put them “at risk for homelessness” if they don’t have a subsidy to supplement their income or any additional resources.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Instability and increased risk of homelessness are linked together by mental illness and drug abuse; living in temporary housing such as a motel or hotel; lack of maintaining stable employment and individuals that were recently incarcerated or released from a mental health

facility. Other areas that could impact instability include lack of available resources such as the availability of affordable housing such as public housing or Section 8; domestic abuse, high medical expenses, or housing that has been condemned due to unsafe and inhabitable living conditions as well as being evicted.

## **Discussion**

The city is working on several initiatives in conjunction with other agencies that will assist in providing affordable housing and reducing the risk of homelessness for low income persons. The city is one of the stakeholders in the Restoring Central Dover Initiative which goal is to revitalize central Dover. Part of the initiative includes expanding the housing repair program to provide additional resources in the target area for home repairs and to boost homeownership opportunities in this area by providing down payment assistance and funding for renovations to families who purchase properties in the designated area. Habitat for Humanity is the lead agency for the Strong Neighborhood Housing Fund which will acquire vacant or foreclosed properties in the target area and use CDBG funding to renovate the property to sell to a family who is 60% and below the area median income in Dover. There are also several incentives available through the Downtown Dover Development District designation. If a property is purchased within the Downtown Redevelopment Target Area, the transfer tax will be waived for owner occupied first time homebuyers and property taxes will be abated for owner occupied homes. Eligible persons shall also be given relief from payment of real estate taxes for the first four years owning their homes with prorated payments for each of the four years the home owner is occupying the property.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

In each income category, African American families have the overall highest percentage of housing problems than any other race with an average of 43%, while white families have an overall average of 38% and Hispanics with 8%.

Housing problems exists when there is at least one of the following problems: lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, and a cost burden greater than 30% as defined by HUD.

HUD's definition of "Disproportionately greater need" exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,220	225	95
White	445	55	75
Black / African American	575	115	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	140	25	0

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2007-2011 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,070	590	0
White	440	300	0
Black / African American	600	210	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	65	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2007-2011 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,165	905	0
White	485	665	0
Black / African American	490	205	0
Asian	80	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	95	25	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2007-2011 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	375	1,260	0
White	125	710	0
Black / African American	135	440	0
Asian	25	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	64	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2007-2011 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## Discussion

There are 10,625 households in the City of Dover with one or more of the four housing problems. Of that total, 1,220 are extremely low income (0%-30% HAMFI); 1,070 are low income households between (30%-50% HAMFI), and 1,165 are moderate income households at (50%-80% HAMFI). Only 375 households have housing problems that are at 80% and above the HAMFI. African Americans have the highest number of housing problems followed by Whites and Hispanics.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

Severe housing problems occur when the following problems exist within a household: lack of complete kitchen facilities, lack of complete plumbing facilities, more than 1.5 persons per room, and a cost burden over 50% of household income. Severe housing problems are most prevalent for households whose income is 0%-30% of the Area Median Income.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,130	315	95
White	405	95	75
Black / African American	525	165	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	140	25	0

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2007-2011 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	720	935	0
White	320	420	0
Black / African American	370	440	0
Asian	0	0	0



<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	65	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2007-2011 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	295	1,765	0
White	150	1,000	0
Black / African American	115	585	0
Asian	10	70	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	25	95	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2007-2011 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 80%-100% of Area Median Income

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	85	1,555	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
White	10	830	0
Black / African American	60	520	0
Asian	0	35	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	104	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

**Data Source:** 2007-2011 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

There are 2,230 households in the City of Dover that are experiencing severe housing problems. Of that total, 1,130 are between 0%-30% of the HAMFI, 720 are between 30%-50% of the HAMFI, 290 are between 50%-80% of the HAMFI and 85 are between 80%-100% of the HAMFI. African Americans households that are very low income have the highest rate of severe housing problems in the City of Dover, followed by whites and a total of 195 Hispanics from all income categories. The populations of all other minorities make up a very small population in the City of Dover. According to the 2010 Census data, there are 2.7% of Asians, and 0.5% American Indians/Alaska Natives and 0.1% of Pacific Islanders in the City. This minority population is not experiencing any severe housing problems.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

The following tables outline the disproportionately greater needs related to the housing cost burden in the City of Dover.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	8,875	2,550	2,155	105
White	5,600	1,140	895	90
Black / African American	2,635	1,055	1,040	0
Asian	120	135	10	0
American Indian, Alaska Native	10	0	0	0
Pacific Islander	0	0	0	0
Hispanic	330	180	130	0

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2007-2011 CHAS

### Discussion:

In the City of Dover, approximately 71% of households spend less than 30% of their income on housing costs with 45% of white households spending less than 30% of their income on housing cost and 21% of African Americans spending less than 30% of their income on housing cost. The remainder of the minority populations identified in the table above is disproportionately represented because only 4% of this population is in this category.

A little over 20% of all households spend between 30% and 50% of their income on housing. With white households spending 9% of their income on housing cost and 8% of African American households spending 8% of their income on housing cost. The remainders of the minority population identified are disproportionately affected with 1% of the Asian population and 1% of Hispanic population paying between 30% and 50% of their income on housing with Asians making up 2.7% of the population in Dover and Hispanics making up 6.6% of the population in Dover. There were no American Indians/ Alaska Natives and Pacific Islanders included in this category.

A total of 17% of all households spend more than 50% of their income on housing with 0.84% of the population has no income or it was not tabulated.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Based on the current 2010 Census data, Dover has a very small concentration of the following ethnic groups: American Indian and Alaska Native 0.5%, Pacific Islander 0.1%, Asian 2.7% and 6.6% Hispanic. Because of the very small concentration of these ethnic groups, there is not a disproportionate impact in any of the income categories.

Under the disproportionately housing needs and severe housing problems, American Indians/Alaska Natives, Pacific Islanders and Asians are not disproportionately affected identifying no housing problems in any of the income categories. However, African Americans and Whites have disproportionately greater housing and severe housing problems in all income categories, with Hispanics having less than 13% of any housing problems in all income categories.

**If they have needs not identified above, what are those needs?**

In addition to affordable housing that meets the housing code, and higher incomes needed to afford housing in Delaware, transportation appears to be an issue for low incomes persons that do not have a vehicle. Public transportation in the City of Dover does not have service after 6:00 pm making it very difficult for this population to commute to other towns outside of Dover for employment.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Based on 2010 Census data, 59% of African Americans make up the population in the Central Dover Downtown Target Area.

## NA-35 Public Housing – 91.205(b)

### Introduction

Dover Housing Authority (DHA) is the local Housing Authority that serves the City of Dover. DHA has a total of 374 public housing units available for occupancy including 31 scattered site units. The majority of these units are 3 bedrooms. DHA also provides rental assistance to low and moderate income persons through HUD's Section 8 Program. Presently there are 174 housing choice vouchers under lease and tenant based which means they are only offered to tenants on DHA's waiting list. The public housing waiting list for Dover Housing Authority has 843 applicants and 635 applicants on the Section 8 waiting list. The average person remains on the waiting list for up to 4 years which increases the risk of homelessness and suffers from a severe housing cost burden paying over 50% of their income in rent.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	280	174	0	174	0	0	7

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	10,427	14,504	0	14,379	0	0	
Average length of stay	0	0	5	5	0	5	0	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	2	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	25	42	0	38	0	0
# of Disabled Families	0	0	68	32	0	28	0	0
# of Families requesting accessibility features	0	0	280	174	0	174	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	35	32	0	30	0	0	2
Black/African American	0	0	244	139	0	130	0	0	5
Asian	0	0	0	1	0	1	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	0	2	0	2	0	0	0
Pacific Islander	0	0	1	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	22	11	0	11	0	0	0
Not Hispanic	0	0	258	163	0	152	0	0	7
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The majority of Section 504 requests are for wheel chair accessible units and requests for one-level units. The request of elderly tenants is for handrails to be installed in the bathrooms.

## Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Several families have requested additional locks on the entrance doors and windows to ensure their disabled children do not open the doors and windows and are able to exit the unit. There is also a challenge for Housing Choice Vouchers holders to find affordable housing that is in

compliance with the City's Housing Code and affordable housing that is accessible for persons with disabilities.

**How do these needs compare to the housing needs of the population at large**

The needs of Dover Housing Authority and the needs of the population at large are comparable in locating decent affordable housing for low and very income persons as well as the need for accessible housing units for persons with disabilities.

**Discussion**



## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

This section provides data on homelessness from a point in time count on January 28, 2014 conducted by the Homeless Planning Council who is the lead agency of the Continuum of Care (CoC) for the State of Delaware. Over the next five years, the City will provide CDBG funding to homeless providers to reduce the risk of homelessness in the City of Dover.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in households with Adult(s) and Child(ren)	51	0	268	216	114	28,984
Persons in Households with Only Children	0	0	2	2	2	8
Persons in Households with Only Adults	79	0	436	390	158	28,022
Chronically Homeless Individuals	8	0	87	83	19	3,928
Chronically Homeless Families	2	0	17	15	4	1,741
Veterans	4	0	39	37	18	2,863
Unaccompanied Child	0	0	5	4	3	957
Persons with HIV	0	0	89	89	39	3,528

Source: CMIS; 2014 ES and TH project stays and unsheltered counts

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

The 2014 Point in Time Count conducted by the Homeless Planning Council for the State of Delaware extracted data for Dover and estimated the number of specific populations that experienced homelessness during the year. There were 268 adults and children, 2 with only children, 17 chronically homeless families and 39 veterans that were homeless during the year.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Data was not available from the Homeless Planning Council for Dover.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

Of the population that was sheltered on a given night, there were 51 persons in households with adults and children, 79 households with only adults, 8 chronically homeless individuals, 2 chronically homeless families and 4 veterans. There was no data for this population experiencing homelessness on a given night.

**Discussion:**

The City of Dover fully supports the Homeless Planning Council initiative to end Chronic Homeless in Delaware by 2017. Although Dover's rate of homelessness is considerably lower than the remainder of the state, there is still a lack of affordable housing and emergency shelters that service the needs of the homeless population in Dover. Over the next five years, the City will provide CDBG assistance to homeless providers to assist in reducing chronic homelessness in Dover.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The special needs population consists of persons that are elderly and frail and elderly; persons with mental, physical, and/or developmental disabilities; persons with alcohol or drug addiction; persons with HIV/AIDS and victims of domestic violence, sexual assault and stalking.

Due to the high cost of living in the State of Delaware, it has become very challenging for this population to find decent affordable housing. The City will continue to provide support for agencies that service this population and will continue to be a priority to service this population over the next five years.

### **Describe the characteristics of special needs populations in your community:**

Based on 2011 American Census Survey data, the population for the City of Dover is 35,849. Of that total, 14.4% are people that are age 65 and older. Individual data for persons with mental health, developmental disabilities, substance abuse and domestic violence was not available for the City of Dover.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Based on consultation from local housing providers that service the needs of these populations, the following has been determined:

- A need for additional supportive services to assist persons with special needs
- A need to incorporate universal design and accessibility standards to meet the needs of the disabled population
- A need for permanent supportive housing to address the needs of the homeless and those at risk of becoming homeless.
- A need for decent affordable rental housing that meets the City's Housing Code to house people with special needs.

### **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Based on data received from the Division of Health and Human Services, there are approximately 618 people with HIV/AIDS living in Kent County as of March 2015. As of March 2014, 203 low income persons are on the waiting list for housing and services in the State of Delaware with the average wait time of 5 years.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

The City funds facilities that service the special needs population such as homeless facilities through its CDBG allocation. Most of these facilities are older buildings that are in need of maintenance and repair. Public Facility needs on a larger scale include additional parking facilities needed in the downtown area and renovations or construction of city government buildings due to aging of its buildings requiring several upgrades and overcrowding of employees due to lack of space. Long range plans include recreation facilities that will service the youth in our community which includes plans for a splash pad and a skate park. Due to funding constraints, it is likely that the City will improve and expand its existing parks and recreational facilities.

### **How were these needs determined?**

Subrecipients identify the needs for public facility improvements for projects that are funded with CDBG funds regarding physical improvements needed to their facilities. For other larger scale projects that are not funded with CDBG funds, public facility needs are determined by City Staff, Advisory Review Committees, Recreational Needs Assessments and a small group of citizens.

### **Describe the jurisdiction's need for Public Improvements:**

Many of the older neighborhoods in Dover have a high concentration of low to moderate income persons and were built from the early 1900's through the fifties and sixties. Due to the age of these areas, they are in need of maintenance and public improvements. As part of Dover's Capital Improvement Plan, City Council recently approved some concrete and asphalt work to be completed on West Street which is located in the Downtown Target Area and the location of the Inner City Cultural League which is a public facility that provides fine arts and culture to youth and their families in the community. Over the next two years, the City has identified the following improvements to be completed at various locations throughout the City:

- Removal and replacement of falling concrete infrastructure
- Road restoration of roads in the City
- Upgrade of existing water main and appurtenances within the Downtown Target Area
- Emergency repairs attributed to inflow and infiltration issues within the City

### **How were these needs determined?**

The City's needs for public improvements were determined from citizen complaints, City Public Works Crews, legislative and City Staff. The City then developed long range goals for the projects that are most in need to be completed over the next five years. The City will receive

Capital Project funding and Community Transportation funding to complete these projects in addition to the use of City funds.

**Describe the jurisdiction's need for Public Services:**

The City provides the majority of its public services through the CDBG program. Each program year, the City allocates 15% of its CDBG allocation towards public service activities. Due to homelessness in Dover having a high priority, the City has consistently provided CDBG funding to homeless providers to address this need. Crime Prevention is also another high priority public service need in the City which is addressed through grant funding from the police department, who recently hired cadets to do community policing in high crime areas of the City.

**How were these needs determined?**

Through the citizen participation process, the City prioritized information received from the community development needs online survey and from focus groups and stakeholder meetings in developing the Consolidated Plan and other initiatives from other non-profit agencies and housing providers. Through this process, funding priorities were established based on the needs identified and the availability of funding sources to address those needs.

## **Housing Market Analysis**

### **MA-05 Overview**

#### **Housing Market Analysis Overview:**

The high cost of housing in Dover and Kent County continues to be a barrier to providing affordable owner-occupied and rental housing for low to moderate income persons. The City is working in conjunction with other housing providers and non-profit organizations on several initiatives and incentives that will promote homeownership and preserve the existing housing stock through the homeowner rehabilitation and emergency home repair programs.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

There are 14,547 housing units in the City of Dover based on the 2007-2011 American Census Survey (ACS) data. Of that total, there are 7,016 owner units and 5,587 renter units. The greatest percentage of units is 1-unit detached structures at 6,808 comprising 47% of the units. Units in residential properties with 5-19 units are the second highest percentage in property type with 2,708 units or 19%. Housing units with 20 or more make up only 9% of all housing units, and only 5% of the units are mobile homes, boats, RV's and vans etc. Three (3) or more bedrooms dominate the unit size by tenure making up 86% among homeowners. Two (2) bedrooms dominate among renters making up 41% with 3 bedrooms at 29% and 1 bedroom at 28% for rental units. Ownership units are predominately of lower density single family detached units on individual lots and medium density apartment units are on a shared open space.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	6,808	47%
1-unit, attached structure	2,299	16%
2-4 units	675	5%
5-19 units	2,708	19%
20 or more units	1,288	9%
Mobile Home, boat, RV, van, etc	769	5%
<b>Total</b>	<b>14,547</b>	<b>100%</b>

Table 26 – Residential Properties by Unit Number

Data Source: 2007-2011 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	15	0%	115	2%
1 bedroom	41	1%	1,569	28%
2 bedrooms	952	14%	2,285	41%
3 or more bedrooms	6,008	86%	1,618	29%
<b>Total</b>	<b>7,016</b>	<b>101%</b>	<b>5,587</b>	<b>100%</b>

Table 27 – Unit Size by Tenure

Data Source: 2007-2011 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**



The City of Dover is served by two public housing authorities: the Dover Housing Authority (DHA) and the Delaware State Housing Authority (DSHA). The two housing authorities operate public housing units within the City of Dover. Dover Housing Authority administers 170 Section 8 Housing Choice Vouchers with a total of 374 public and subsidized housing units. DSHA has 955 Housing Choice Vouchers and 508 public housing units. The two housing authorities service the low and the very low income families. The City of Dover provides CDBG funding to the Homeownership Assistance Program that services persons that are 80% and below the Area Median Income by providing down payment assistance to first-time homebuyers who want to purchase affordable housing in the City. CDBG funds are also utilized for the homeowner rehabilitation and emergency home repair programs that benefit low and moderate income persons.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

There will not be a loss of units.

**Does the availability of housing units meet the needs of the population?**

The fact that there are 843 people on the waiting list for public housing and 635 people on the waiting list for Housing Choice Vouchers indicates there is a high demand for affordable housing in the City of Dover. Currently there are 1,520 renters and 570 homeowners paying more than 50% of their income on housing. These numbers indicate there is a need for approximately 3,600 affordable housing units.

**Describe the need for specific types of housing:**

Special needs housing for those that are handicapped, elderly, mentally challenged, suffering from substance abuse and individuals with HIV/AIDS continues to be a need. Most often this population is characterized as being a cost burden and paying over 50% of their income on housing. In addition, families with children that are low income continue to have a need for affordable housing due to overcrowding.

**Discussion**

The City's goals are to continue to preserve the existing housing stock as well as increase the incentives to provide affordable housing for the populations identified. There are several initiatives in place to revitalize the Central Dover Target Area in low to moderate income areas that include constructing affordable housing, providing homeownership assistance and incentives for first time homebuyers who purchase properties in the target areas, and make homeowner repairs to home found in violation of the City's Housing Code.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

Based on data from the 2007-2011 American Census Survey (ACS) data, the median home value increased 80% from \$107,700 in 2000 to \$193,900 in 2011. Housing cost for renters also increased 49% over the past 11 years indicating a need for affordable rental housing in the City of Dover.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	107,700	193,900	80%
Median Contract Rent	521	778	49%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	1,279	22.9%
\$500-999	3,344	59.9%
\$1,000-1,499	885	15.8%
\$1,500-1,999	58	1.0%
\$2,000 or more	21	0.4%
<b>Total</b>	<b>5,587</b>	<b>100.0%</b>

Table 29 - Rent Paid

Data Source: 2007-2011 ACS

### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	635	No Data
50% HAMFI	1,340	375
80% HAMFI	3,215	1,090
100% HAMFI	No Data	2,034
<b>Total</b>	<b>5,190</b>	<b>3,499</b>

Table 30 – Housing Affordability

Data Source: 2007-2011 CHAS

## Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	649	830	984	1,378	1,738
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

**Table 31 – Monthly Rent**

**Data Source:** HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

Housing is needed for all income levels but there is a greater need for affordable housing for low and very low income persons in the City of Dover.

### How is affordability of housing likely to change considering changes to home values and/or rents?

Over the past 11 years, the rental rates in Dover have increased over 49% and most likely will continue to rise over time with a decrease in affordable rental housing units. The median home value had an even higher increase by 80% from 2000 to 2011. With home values expected to rise over time, affordable housing will become an issue if production of affordable housing is not constructed over time.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The City of Dover and Dover Housing Authority do not receive HOME funds; however the Fair Market Rent for a 2 bedroom rental unit is higher than the most recent median contract rent by \$206. This presents an issue for persons that do not live in subsidized housing that are low income and paying over 50% of their income on housing. With the lack of affordable rental housing, it will also be difficult for persons with Housing Choice Vouchers to find suitable housing.

## Discussion

The City of Dover is collaborating with other local housing providers on several initiatives to provide affordable housing in low to moderate income target areas as well as city-wide by providing homeownership assistance to first time home buyers who purchase properties within the City of Dover and designated target areas, provide real estate tax relief over a 4 year period for persons that purchase properties within the designated target area, receive a transfer tax rebate for properties upon issuance of a Certificate of Occupancy for properties purchased after March 1, 2015 within the designated target area, and partnering with non-profits that will be constructing affordable housing for low income persons over the next few years.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

This section provides data on the condition of housing stock in the City of Dover and defines the characteristics of substandard housing.

### Definitions

HUD defines substandard housing which is dilapidated, without operable indoor plumbing or a useable flush toilet or bathtub inside the unit for the family's exclusive use, without electricity or with inadequate or unsafe electrical service, without a safe or adequate source of heat, and should but does not have a kitchen, or has otherwise been declared unfit for habitation by the government.

HUD defines standard housing as decent, safe, sanitary and in good repair. The structure shall be maintained in good repair, structurally sound and in a sanitary condition so that it does not adversely affect the occupants' health and safety as outlined in the 2009 International Property Maintenance Code adopted by the City of Dover.

The City considers a housing unit to be in a substandard condition but suitable for rehabilitation when it has one or more major and/or critical defects, but can still be repaired for a reasonable amount.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	2,038	29%	2,680	48%
With two selected Conditions	137	2%	43	1%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	4,841	69%	2,864	51%
<b>Total</b>	<b>7,016</b>	<b>100%</b>	<b>5,587</b>	<b>100%</b>

Table 32 - Condition of Units

Data Source: 2007-2011 ACS

### Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,060	15%	930	17%
1980-1999	2,321	33%	1,852	33%
1950-1979	2,905	41%	2,234	40%
Before 1950	730	10%	571	10%
<b>Total</b>	<b>7,016</b>	<b>99%</b>	<b>5,587</b>	<b>100%</b>

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,635	52%	2,805	50%
Housing Units build before 1980 with children present	790	11%	554	10%

**Table 34 – Risk of Lead-Based Paint**

**Data Source:** 2007-2011 ACS (Total Units) 2007-2011 CHAS (Units with Children present)

### Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	350	5	355
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

**Table 35 - Vacant Units**

There are a total of 355 vacant units in the City of Dover, where 350 are suitable for rehabilitation and 5 are not suitable for rehabilitation and will be demolished by the City. Data for Abandoned vacant units, REO properties and abandoned REO properties was not available.

### Need for Owner and Rental Rehabilitation

Homeowner Rehabilitation has been identified as a high priority in determining the needs for the City of Dover by stakeholders from the City's first public hearing. The City's central Target Area has the highest percentage of older homes throughout the City which is in need of homeowner rehabilitation assistance and rental rehabilitation.

### Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Among owner-occupied units, 52% or 3,635 units were constructed before 1980 with 11% of these units having children present, and 2,805 or 50% of rental units were constructed prior to 1980 with 10% of the units having children present is a high risk for lead based paint for housing units constructed at the time. There are approximately 4,955 households that are 80% and below the Area Median Income representing 40% of all households. Based on this number and the percentages of owner and renter occupied households with potential lead –based paint hazards, there are potentially 3,500 units occupied by low or moderate income families that contain lead based paint hazards.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

Dover Housing Authority (DHA) is the local Housing Authority that services the City of Dover. DHA owns and operates a total of 374 public housing and subsidized units. DHA is a high performing Public Housing Authority scoring 92 out of 100. Delaware State Housing Authority operates one public housing development in the City of Dover that has 108 housing units.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			298	170		170	0	0	22
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

**Table 36 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

Dover Housing Authority provides rental assistance through Section 8 and public housing units as well as operates and manages two public housing units for senior citizens and persons that are disabled. DHA manages 5 scattered site areas throughout Dover and maintain and operate 17 tax credit units.

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

DHA has identified the physical condition of their properties in their 5-year Physical Needs Assessment. They are in the process of determining the projects with the greatest need and fully renovating and upgraded those properties that have been prioritized with the greatest need.

## Public Housing Condition

Public Housing Development	Average Inspection Score
Dover Housing Authority	92

Table 37 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The needs of the housing authority as identified in DHA's 5-year plan include:

- Upgrade of HVAC system at Hayes Circle, Manchester Court, Derby Estates and Queen Manor
- Restriping and repaving all public housing parking areas
- Roofing upgrades
- Kitchen floor upgrades
- Bathroom upgrades
- Heater room door upgrades

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

DHA completes an annual and 5-year plan in which they conduct a Physical Needs Assessment of their public housing inventory and determine the projects need to be completed in order of priority. Within the 5-year plan, they determine the importance and rank of each project. The funding they use to improve the living environment of their families comes from their Capital Fund Program and their Operating Subsidy funds.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

The City of Dover is committed to the challenge to end homelessness and serves as a member of the Delaware Interagency Homeless Council to oversee the implementation of the ten year plan to end chronic homelessness and educate the community about the need and advantages of ending chronic homelessness. The City has been consistent by providing support and CDBG funding to housing providers that service the homeless population.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	51	0	26	0	0
Households with Only Adults	65	5	4	5	0
Chronically Homeless Households	0	0	0	5	0
Veterans	0	0	0	0	0
Unaccompanied Youth	3	0	5	0	0

**Table 38 - Facilities and Housing Targeted to Homeless Households**



**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Mainstream services are available throughout the State of Delaware for homeless persons including Kent County which services Dover. The homeless housing providers that shelter the homeless work in connection with mainstream service providers to address the needs of the homeless. Services such as medical care, substance abuse counseling and mental health counseling are available through individual medical insurance which can be applied for at the local State Service Center. They get employment services through the Department of Labor and income support such as Social Security, child support and TANF through the Social Security Administration and the local State Service Center.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Salvation Army - This organization carries out crisis alleviation through the administration of Federal Emergency Management Agency (FEMA) shelter, utilities, rent and mortgage assistance programs. It also coordinates and refers people to shelters, motels, and local service providers. Its youth activities included: the After School Achievement Program (ASAP), summer camp, Alternative School, Christmas toy and food donations. The adult programs include: nursing home and prison visitation, daily hot meal program, home league mothers support, GED education and basketball leagues.

Eight-O-One Life Encompassing Living Program - This program houses adolescent's ages 10-18 years old in a crisis situation for a thirty-day period. It also provides diagnostic treatment services to adolescents and AFDC recipients who have been determined to be "at risk" for being abused and neglected. This facility has 12 beds.

Shepherd Place, Inc. - This agency operates a relief shelter for homeless women and children only. It provides emergency food baskets, information and referral services, and transportation for in house clients. The services are available on a 24-hour basis, the average stay at the shelter is 2-3 weeks, but does not exceed 30 days. The facility has 20 beds and is located just beyond the City limits.

People's Place II – (Formerly known as Whatcoat Social Service Agency: Ruth M. Dorsey Shelter) This agency operates a relief shelter for homeless persons. It provides emergency food baskets, information and referral services, and transportation for in house clients. The services are available on a 24-hour basis, the average stay at the shelter is 2-3 weeks, but does not exceed 30 days. This facility has 46 beds.

Connections Community Support Program - This agency is one of the largest housing providers in the State of Delaware that services homeless and the special needs population. The following is a list of mainstream services that they provide:

- Community Housing Program for people who are homeless and people with mental health/or substance abuse problems
- Rental subsidies for people who incomes are 50% below the area median income who need assistance their rent and utilities
- Licensed group homes for adults with mental health conditions who need personal care assistance
- Community living arrangements with in-home supports with adults with intellectual disabilities
- Residential alternatives to detention for youth involved with the juvenile justice system
- Emergency shelter for homeless families and transitional housing for veterans and veterans' families
- Oxford Houses which offer alcohol and drug free, democratically run, community housing alternatives for people who are recovering from substance use conditions.

Dover Interfaith Mission for Housing – This agency is a non-profit organization that operates a shelter for homeless men and provides services to the homeless to assist in obtaining permanent affordable housing.

Elizabeth Murphey School - This agency is a non-profit group home that services up to 40 neglected and abused children that have been identified as being homeless on an annual basis.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

There are some individuals in the special needs population that may have difficulties in finding social service facilities as well as supportive services and housing services due to their needs. HUD's definition of the special needs population includes the frail and non-frail elderly, persons with physical, mental, or behavioral disabilities, and persons with HIV/AIDS, persons with alcohol or drug addictions.

Supportive services for the non-homeless were identified by service providers that identified the following needs that include accessibility improvements, homeowner repairs for elderly persons that choose to live independently, affordable housing for special needs persons, and treatment facilities for persons who suffer from substance abuse. The facilities and services that service this population have been outlined below.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

The special needs population identified need the following supportive housing needs:

- Increase in supportive services that allow persons with special needs to live independently
- Increase in supply of affordable, accessible units for sale and rent
- Increase in government funding for homeless services, particularly emergency shelters
- Increase in affordable, assisted living choices for seniors

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

There are few programs in Dover that provide supportive housing for persons with mental and physical health conditions. The majority of these programs are provided by the Division of Health and Social Services throughout the State of Delaware.

- Serenity Place is a substance abuse treatment facility located in Dover that provides residential long term treatment and has 10 licensed beds.
- National Alliance of Mental Illness (NAMI) is a non-profit organization which helps mentally ill persons and their families cope with problems created by the illness. In addition, they develop affordable housing for persons with chronic mental illness. NAMI services all three counties in Delaware.
- Division of Substance Abuse and Mental Health assist those who suffer from mental illness and substance abuse access treatment and prevention for mental health substance abuse conditions and serves all three counties in Delaware.

- Dover Behavioral Health facility provides inpatient and outpatient treatment to adolescents and adults who suffer from mental health conditions and addictions
- Connections Community Support Program provides community based treatment, support, and housing and rehabilitation services for people recovering from mental health and substance abuse disorders, homelessness and HIV/AIDS and serves all three counties in the State of Delaware.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Over the next year, the City of Dover has designated CDBG funding to housing providers that service the homeless and those that are at risk of becoming homeless by providing rental assistance / rapid rehousing services that will provide security deposits and rental assistance for up to three months to assist renters who qualify for affordable rental housing.

The City will continue to provide CDBG funding for the Homeowner Rehabilitation and Emergency Home Repair program to assist those that are 80% and below the area median income as well as those that are elderly and disabled who need repairs to their homes.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

See response above.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

At this time, it is the City of Dover's contention that there are no significant barriers to affordable housing which describes dwelling units whose total cost are deemed affordable to those who have a median income. However, there are few constraints that may be an obstacle in constructing affordable housing such as development impact fees which increases the cost to develop new housing, land use policies outlined in the City's Comprehensive Plan, and building and zoning codes.

Unlike many communities, Dover has not practiced "exclusionary zoning" where most of the undeveloped land is designated for large lot single family detached homes. To the contrary, The Dover Plan (Dover's Comprehensive Plan) designates a large portion of undeveloped lands for medium density housing, and a smaller but significant portion for high density housing. The land is subsequently zoned accordingly, permitting a range of residential densities and housing types. The most recent *2008 Comprehensive Plan Update* was adopted in February 2009 with amendments in November 2009, March 2011, April 2011, March 2012, and March 2014. The Land Development Plan specifically identifies a range of residential land uses from low density to high density throughout the City. The plan continues to recommend a range of residential densities and focuses specifically on housing in one chapter.

The City of Dover is currently working on several revitalization and housing initiatives in collaboration with other local housing providers that will assist in reducing the barriers to affordable housing. The following is an outline of incentives and goals to promote affordable housing in the City of Dove within designated target areas:

#### **Incentives**

- Provide up to 20% cash rebate for qualifying construction projects (capped at \$1 million/property)
- A transfer tax rebate of the buyer's portion of the real estate tax upon issuance of a Certificate of Occupancy
- Waiver of building, plumbing, mechanical and fire protection permit fees
- Waiver of City sewer and water impact fees
- 10 year abatement of property tax on the value of improvements
- Up to \$20,000 in down payment cost to purchase affordable housing
- Property tax abatement for first-time homebuyers who purchase property in the Redevelopment Target Area that occupy the home as their principal residence for four years

## **Goals**

- Encourage greater zoning flexibility to enable infill housing development in the Downtown Redevelopment District by relaxing setback and block standard requirements to allow condominiums and townhouse styles of housing.
- Explore land banking and land trust options for assembling parcels and redevelopment efforts.
- Strengthen existing housing by expanding the Home Repair Programs

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

### Economic Development Market Analysis

### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	54	40	1	0	-1
Arts, Entertainment, Accommodations	1,788	4,760	19	23	4
Construction	415	296	4	1	-3
Education and Health Care Services	2,245	6,161	24	30	6
Finance, Insurance, and Real Estate	601	978	6	5	-1
Information	193	488	2	2	0
Manufacturing	858	985	9	5	-4
Other Services	456	1,229	5	6	1
Professional, Scientific, Management Services	518	1,204	6	6	0
Public Administration	0	0	0	0	0
Retail Trade	1,663	3,961	18	19	1
Transportation and Warehousing	335	254	4	1	-3
Wholesale Trade	274	446	3	2	-1
Total	9,400	20,802	--	--	--

**Table 39 - Business Activity**

**Data Source:** 2007-2011 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	16,097
Civilian Employed Population 16 years and over	14,595
Unemployment Rate	9.33
Unemployment Rate for Ages 16-24	19.85
Unemployment Rate for Ages 25-65	4.75

**Table 40 - Labor Force**

Data Source: 2007-2011 ACS

Occupations by Sector	Number of People
Management, business and financial	2,997
Farming, fisheries and forestry occupations	649
Service	1,955
Sales and office	3,927
Construction, extraction, maintenance and repair	994
Production, transportation and material moving	962

**Table 41 – Occupations by Sector**

Data Source: 2007-2011 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	12,018	78%
30-59 Minutes	2,234	14%
60 or More Minutes	1,247	8%
<b>Total</b>	<b>15,499</b>	<b>100%</b>

**Table 42 - Travel Time**

Data Source: 2007-2011 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	905	139	802
High school graduate (includes equivalency)	2,898	167	845
Some college or Associate's degree	4,104	303	868



Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	3,479	150	667

**Table 43 - Educational Attainment by Employment Status**

Data Source: 2007-2011 ACS

#### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	63	63	54	146	569
9th to 12th grade, no diploma	449	389	550	670	525
High school graduate, GED, or alternative	1,506	1,029	1,003	1,934	1,609
Some college, no degree	4,232	1,656	907	1,560	849
Associate's degree	191	341	541	574	233
Bachelor's degree	395	1,148	531	1,337	426
Graduate or professional degree	63	220	303	1,031	477

**Table 44 - Educational Attainment by Age**

Data Source: 2007-2011 ACS

#### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,009
High school graduate (includes equivalency)	27,151
Some college or Associate's degree	32,182
Bachelor's degree	46,018
Graduate or professional degree	62,079

**Table 45 – Median Earnings in the Past 12 Months**

Data Source: 2007-2011 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

Arts, Entertainment, Accommodations  
Education & Health Care Services  
Manufacturing  
Retail Trade

**Describe the workforce and infrastructure needs of the business community:**

Health Care, Education, Tourism and Hospitality are placing a growing demand on the workforce. It is essential that the educational programs available provide a well-trained and available workforce for these growing industries.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Dover's designation as a Downtown Development District has already led to increased interest by developers in the City's priority redevelopment target area. This designation will be in place for ten years. The City of Dover is one of the partners in the Restoring Central Dover project where NCALL is the lead agency/organization. The initiatives developed under the grant for this project will have a direct impact on the areas surrounding Downtown Dover targeted for commercial and residential redevelopment. The Garrison Oak Technology Park infrastructure construction is slated for completion by summer 2015. The installation of roads, curbs, a water tower to the already completed water, sewer, gas, electric and fiber optic services will make this a very attractive location for businesses interested in relocating or expanding operations in Dover.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

Based on the training provided by our local high school and higher education institutions, the current workforce has the skills and education needed to take advantage of current employment opportunities.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Delaware State University, Wesley College, Wilmington University and Delaware Technical and Community College offer on-going and specialized training opportunities through their Workforce Development and Community Education programs designed to meet the technology changes and needs of local employers. DTCC course offerings include computer training, health care and "green training programs" from solar technology to automated building management. Delaware State University In addition to offering computer and health care education opportunities has a School of Business that offers undergraduate and graduate degrees in business and economics. Wesley College has implemented and expanded health care training

courses including the BSN and MSN degrees. Polytech High School offers a variety of adult education courses and vocational training for high school students. These educational institutions support the jurisdiction's consolidated plan by providing a well trained workforce in a variety of skill sets required by local employers

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?** Yes.

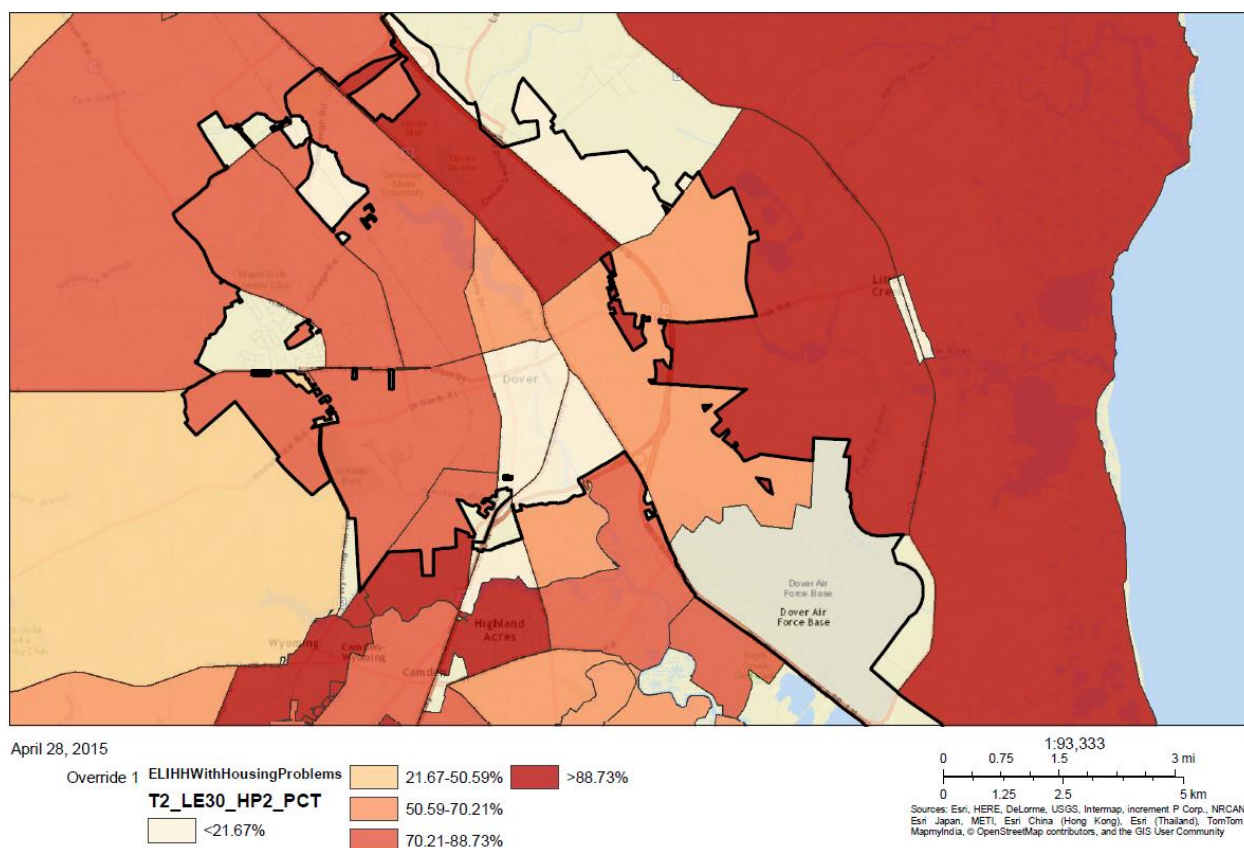
**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The current CEDS plan developed by the State of Delaware was submitted to the US Economic Development Administration in February 2015. Although the City of Dover does not have a project currently listed, projects may be added as the need arises. The previous CEDS document listed the infrastructure improvements at the Garrison Oak Technology Park as the state's highest priority CEDS project.

## MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?  
(include a definition of "concentration")**

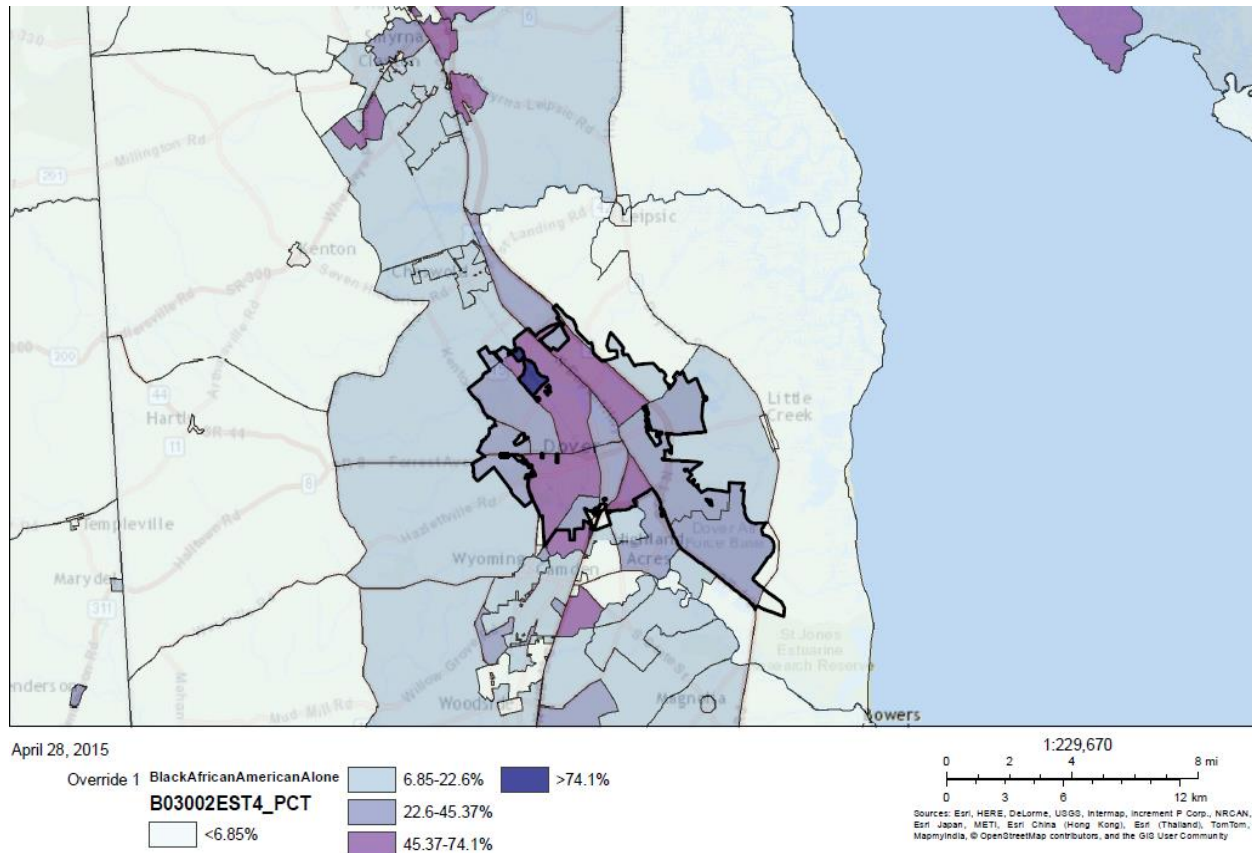
The Census Bureau defines an area of concentration as a neighborhood or development in which more than 30% of the population has a common race, ethnicity or income. HUD defines a low and moderate income area where at least 51% of the residents are low and moderate income. Areas of concentration for low income households are significant because they often experience multiple housing problems to a much greater degree than the population in general.



**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

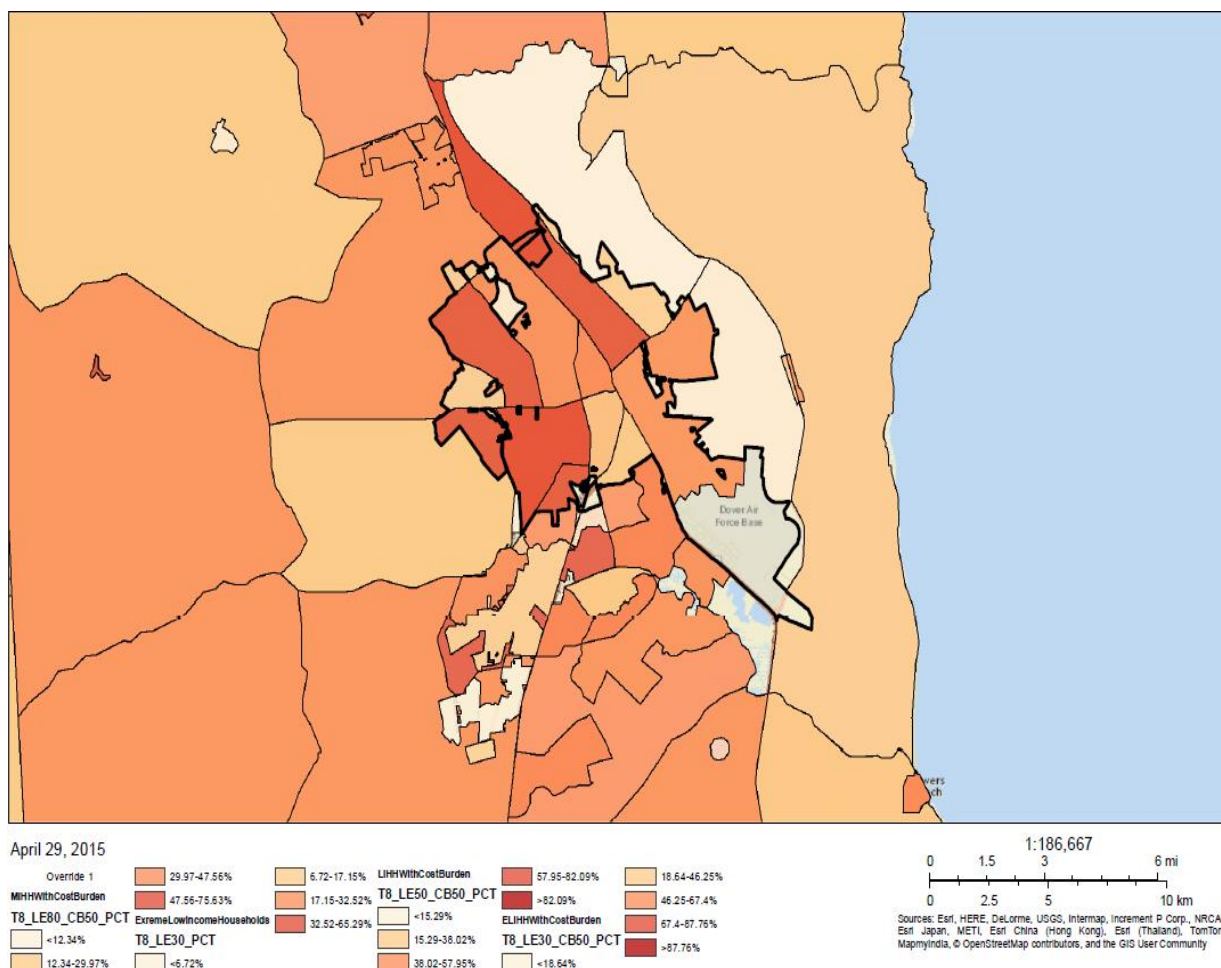
The largest minority group in Dover is the African-American community. This community is located in two major areas. The first area is the historically African American settlement area. These areas were originally laid out and developed by African Americans, included in this category are Lincoln Park, Northwest Dover Heights, The College Settlement on State College Road and the western edges of Central Dover. The second area is dominated by the public housing developments and subsidized private developments, which have attracted a large number of minority residents. Included in this category are Capital Green, Whatcoat Apartments, Simon Circle, and Manchester Square.

In the City of Dover, HUD has designated those Census Block groups, which have greater than a 51% concentration of low-moderate income persons. The areas within City limits are limited to Block Group 408-01, 413-01, 412-01 and 410-02. The map below identifies the concentration of African Americans within the City of Dover.



### What are the characteristics of the market in these areas/neighborhoods?

The majority of the homes located within the referenced census tracts are older single family homes that were constructed before 1950 and from 1950-1979. In the Central Dover Target Area, many of the residents face a considerable housing cost burden with 81% of renters in the area paying more than 30% of their income towards rent. In addition, 75% of properties in this area are occupied by renters with only a 25% homeownership rate.



### Are there any community assets in these areas/neighborhoods?

Yes. The City of Dover Downtown Business District is located in the Central Dover Target area and within a short distance of low income block groups. Local and State government buildings and the public library are also centrally located within these areas.

### Are there other strategic opportunities in any of these areas?

As mentioned early, there are several revitalization projects underway that will preserve the existing housing stock by rehabilitating older properties in the designated target areas, increase homeownership by providing down payment and rehabilitation assistance to first time homebuyers who purchase properties in the designated target areas, construct affordable housing, provide transfer and real estate transfer tax relief, strengthen the Downtown business community by waiving business licenses fees and offer façade improvement grants to help business owners improve their storefronts, and receive up to 20% cash rebate for qualifying construction projects.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Consolidated Plan and the Strategic Plan was prepared in compliance with federal regulations requiring a Consolidated Plan to be completed every five years. An analysis of the population information with priority needs and goals have been prepared to guide the City's Community Development Block Grant Program over the next five years.

The Strategic Plan will outline the goals and objectives to be completed over the next five years that will service low to moderate income people in the City of Dover.

The following list the priority and community development needs identified for the next five years:

- Homeless Needs
- Permanent Supportive Housing
- Public Service Needs
- Homeownership Assistance
- Homeowner Rehabilitation
- Public Facility Improvements

The following three (3) goals and objectives have been set for priorities based on guidelines from HUD:

**Goal 1:** Provide Aid to special needs persons

#### **Objective:**

The City will support the homeless population to agencies that service the homeless by providing CDBG funding to homeless shelters, support rapid rehousing/rental assistance for those that are risk of homelessness, and support the Homeless Planning Council's goal to end Chronic Homelessness in Delaware.

**Goal 2:** Preserve the existing housing stock in the City of Dover

#### **Objective:**

The City will continue to rehabilitate owner occupied homes found in violation of the City's Housing Code and provide assistance for emergency repairs that will eliminate severe housing conditions that constitute health and safety hazards.

**Goal 3:** Encourage owner occupied housing in low to moderate income areas

**Objective:**

The City will provide down payment and settlement assistance to qualified families who purchase properties in the City of Dover and designated revitalization target areas.



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

### **Geographic Area**

The City of Dover will allocate CDBG funding city-wide to projects that service persons that are low and moderate income and in designated target areas where at least 51% of the residents that will be serviced are low to moderate income.

**Table 46 - Geographic Priority Areas**

### **General Allocation Priorities**

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

The City of Dover is a small entitlement community that only receives CDBG funding. The majority of CDBG funding will have an impact on low to moderate income persons city-wide that entails providing funding to homeless shelters for operating cost and maintenance cost, and homeless providers that will provide temporary and permanent supportive housing to those that are at risk of becoming homeless. The City will continue to provide funding to the housing rehabilitation and emergency home repair programs that will service low to moderate income person's city wide. The City has focused on providing down payment assistance along with other incentives the City is offering to qualifying families that purchase affordable housing within the designated target area. In addition, the City will geographically coordinate CDBG funding for renovations to existing vacant housing that will be sold to low income persons and will preserve the existing housing stock in the City of Dover. The City has effectively affirmatively furthered fair housing by creating a balance serving low to moderate income persons in impacted and non-impacted areas throughout the City.

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

### Priority Needs

Table 47 – Priority Needs Summary

1	<b>Priority Need Name</b>	Homelessness
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Chronic Homelessness Individuals Mentally Ill Victims of Domestic Violence Families with Children Unaccompanied Youth Persons with HIV/AIDS Veterans Elderly Frail Elderly
	<b>Geographic Areas Affected</b>	Citywide
	<b>Associated Goals</b>	Public Services Affordable Rental Housing
	<b>Description</b>	The City will provide funding to support homeless providers to emergency shelters and for rental assistance/rapid rehousing for those at risk of becoming homeless. The City has also accepted the challenge to End Veterans Homelessness by December 2015.
	<b>Basis for Relative Priority</b>	Although the City of Dover has the lowest population of homelessness in the State of Delaware, there remains a high need to service this population in the City. There is a shortage of resources and available emergency shelters in Dover.
2	<b>Priority Need Name</b>	Homeowner Rehabilitation
	<b>Priority Level</b>	High

	<b>Population</b>	Extremely low Low Moderate
	<b>Geographic Areas Affected</b>	Citywide Designated Target Areas
	<b>Associated Goals</b>	Homeowner Rehabilitation
	<b>Description</b>	To preserve the existing housing stock in the City by bringing housing found in violation of the City's Housing Code up to standard conditions.
	<b>Basis for Relative Priority</b>	Based on the Community Development Needs survey and meeting with focus groups, homeowner rehabilitation needs were determined to be a high priority in the City of Dover.
3	<b>Priority Need Name</b>	Homeownership Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Citywide Designated Target Areas
	<b>Associated Goals</b>	Homeownership Assistance
	<b>Description</b>	Homeownership Assistance includes down payment and settlement assistance to first-time homebuyers who purchase affordable housing in the City of Dover.
	<b>Basis for Relative Priority</b>	There is a high demand for affordable housing in the City of Dover, especially for low to moderate income persons

### Narrative (Optional)

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

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The Dover Housing Authority administers the Section 8 Housing Choice Vouchers for rental assistance in Dover. Due to lack of affordable rental housing in Dover and landlord's unwillingness to rent to Section 8 tenants, it is very difficult to obtain affordable housing. The City's goals are to support developers who construct affordable rental housing and to preserve the existing rental housing.
TBRA for Non-Homeless Special Needs	See the description above. The TBRA is intended to assist low income residents who may not have special needs.
New Unit Production	At the present time, there is more of a focus on existing housing rehabilitation than new construction due to the cost of land, infrastructure improvements required for development of land and construction and accessibility standards to construct affordable housing
Rehabilitation	The City will continue to provide funding for the Homeowner Rehabilitation Program due to the high demand in the City, especially for older housing stock. Homeowner rehab continues to be a top priority in determining community development needs throughout the Consolidated Plan process every five years.
Acquisition, including preservation	CDBG funds can be used as gap financing for down payment assistance to purchase affordable housing and also used to preserve existing housing acquired by housing providers and in need of renovations before selling to a low to moderate income family.

**Table 48 – Influence of Market Conditions**

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

### Introduction

The City of Dover receives the Community Development Block Grant (CDBG) from the United States Department of Housing and Urban Development (HUD).

Since CDBG resources are very limited, the City coordinates projects with other city departments, State and Local Housing Authorities and partners with non-profit and private organizations that have multiple resources that will aid in meeting the goals and objectives of the Consolidated Plan.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	federal	Homeowner Rehab Homebuyer Assistance Public Facility Improvements Rapid Re-housing (rental assistance) Public Services	\$220,717	\$8,554	0	\$229,271	\$917,084	Expected amount includes a reduction in grant funding over a four year period.

Table 49 - Anticipated Resources

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

There is not a match requirement for CDBG funds; however, sub-recipient agencies that were funded have additional resources to

supplement their projects. In addition, there are several initiatives and investment projects in the City where CDBG funds will be used as an additional resource to supplement funding these projects.

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

Two lots owned by the City were sold to Habitat for Humanity below market rate to build affordable housing for very low income families. In addition, Habitat has purchased additional lots and properties within the City in which new housing will be constructed and existing housing renovated to provide affordable housing to very low income families.

**Discussion**

This section is optional and was left blank intentionally.

## SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Dover	Local Government	Planning and Administration Homeownership Assistance Program	City of Dover
Dover Housing Authority	Public Housing Authority	Public Housing Rental Assistance Tax Credits	City of Dover
Delaware State Housing Authority	State Housing Authority	Rental Tax Credits Homeownership Assistance Homelessness Non-homelessness Special Needs	Statewide
Delaware Continuum of Care	Continuum of Care	Homelessness rapid rehousing permanent supportive housing emergency housing	Statewide
NCALL Research, Inc.	Non-Profit	Housing Counseling Loan Financing Housing Development Financial Literacy Foreclosure Prevention Self-Help Housing	Statewide
Milford Housing Development Corporation	Non-Profit	Housing Rehabilitation Emergency Repairs Self Help Housing Rental Tax Credits Transitional Housing	Kent and Sussex Counties
Dover Interfaith Mission for Housing Connections Community Support Program Peoples Place II	Subrecipients	Homelessness Rapid Rehousing Supportive Housing Substance Abuse Treatment Public Services	City of Dover Statewide

**Table 50 - Institutional Delivery Structure  
Assess of Strengths and Gaps in the Institutional Delivery System**

The City of Dover administers the Community Development Block Program (CDBG) and provides funding to agencies that service the needs of the very low and low to moderate income persons within the City of Dover. These services include providing aid to the homeless, housing rehabilitation, homeownership assistance and housing counseling.

The main gap that exists in the Institutional Delivery System is the lack of affordable rental housing. The public housing waiting list for Dover Housing Authority has 843 applicants and 635 applicants on the Section 8 waiting list. The average person remains on the waiting list for up to 4 years which increases the risk of homelessness and suffers from a severe housing cost burden paying over 50% of their income in rent.

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

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

**Table 51 - Homeless Prevention Services Summary**



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

Local and Statewide service providers provide mainstream services such as healthcare, mental healthcare, substance abuse counseling, food assistance and job training to low income population and those with special needs. The Delaware Continuum of Care also provides mainstream services for homeless individuals that include rapid rehousing, permanent supportive housing and emergency shelter.

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

The strengths of the service delivery system are the existing services provided by state service and housing providers. The City will continue to support these providers to assist in servicing the needs of this population. The gaps in the delivery system include a lack of federal funding and affordable housing for persons that have low and very low income in addition to the limited number of overnight shelter beds.

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

The strategy for overcoming gaps in the institutional structure is to continue to provide CDBG funding and support to the existing service and housing providers that service the needs of low income persons and those with special needs. In addition, the City will continue to work collaboratively with non-profits and the State and local housing authorities on initiatives that support affordable housing in the City of Dover.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HP-1 Homeless/ Rapid Re-housing	2015	2016	Homeless	City-wide	Homeless Rapid Re-housing Provide motel vouchers	CDBG: \$7,391	Tenant Based Rental Assistance/Rapid Re-housing 10 households assisted
2	HP-2 Homeless Prevention	2015	2016	Homeless	City-wide	Homeless Prevention	CDBG: \$27,000	Provide shelter for 170 homeless men
3	AH-1 Affordable Housing	2015	2016	Affordable Housing	City-wide/ Target Area	Homebuyer Assistance	CDBG: \$60,000	Direct Financial Assistance to Homebuyers: 4 households assisted
4	AH-2 Affordable Housing	2015	2016	Affordable Housing	City-wide	Housing Stock Rehabilitation	CDBG \$88,154	Homeowner Rehabilitation : 5 Household units Emergency Repairs: 10 Household units assisted
5	AH-3 Affordable housing	2015	2016	Affordable Housing	City-Wide/ Target Area	Housing Stock Rehabilitation	CDBG \$40,000	Renovate one single family home
6	PF-4 Public Facility Improvements	2015	2016	Affordable Housing	City-wide	Public Facility Improvements	CDBG \$6,726	Renovations to homeless shelter, 710 persons served

**Table 52 – Goals Summary**

## Goal Descriptions

1	<b>Goal Description</b>	Meet the needs of persons that are homeless or at risk of homelessness by providing rental assistance, affordable housing, and provide motel vouchers for temporary housing to prevent homelessness.
2	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Meet the needs of men that are homeless by providing shelter and assist in providing permanent supportive housing.
3	<b>Goal Name</b>	Affordable Housing/Homeownership Assistance
	<b>Goal Description</b>	Increase homeownership by providing down payment and closing cost to low income persons who purchase affordable housing in the City.
4	<b>Goal Name</b>	Affordable Housing /Preserve the Existing Housing Stock
	<b>Goal Description</b>	Rehab owner occupied housing that is in violation of the City's Housing Code and complete emergency repairs that will eliminate health and safety hazards in order to preserve the existing housing stock in the City.
5	<b>Goal Name</b>	Public Facilities and Improvements
	<b>Goal Description</b>	Renovations will be completed on public facilities that service low income persons.

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

The City of Dover is not a recipient of HOME funds, however the City estimates that ii will complete 25 homeowner rehabs within the City of Dover and provide homeownership assistance to 20 first-time homebuyers who purchase affordable housing in the City.

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

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

The Dover Housing Authority (DHA) waiting list for public housing as of 2014 indicated there are 21 accessible housing units in need. As part of their goals to complete for the Analysis of Impediments, DHA has indicated they will apply the minimum set-aside for accessible units and require assessable units in all housing projects.

### **Activities to Increase Resident Involvements**

DHA provides their residents with support and assistance in job training, parenting, counseling, financial management, and other skills. These programs are integrated in the housing programs through the Family Self-Sufficiency Program and/or other resident initiatives. It is the position of the City of Dover that these programs provide excellent opportunities for those in public housing to become economically and socially self-sufficient. The following are additional programs that involve resident involvement:

- GED/ABE Literacy Classes
- Employment Training for Adults and Youth
- After School and Summer Programs for Youth
- Life Skills and Soft Skills Training for Adults

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

No

### **Plan to remove the ‘troubled’ designation**

N/A

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

### **Barriers to Affordable Housing**

At this time, it is the City of Dover's contention that there are no significant barriers to affordable housing which describes dwelling units whose total cost are deemed affordable to those who have a median income. However, there are few constraints that may be an obstacle in constructing affordable housing such as development impact fees which increases the cost to develop new housing, land use policies outlined in the City's Comprehensive Plan, and building and zoning codes.

Unlike many communities, Dover has not practiced "exclusionary zoning" where most of the undeveloped land is designated for large lot single family detached homes. To the contrary, The Dover Plan (Dover's Comprehensive Plan) designates a large portion of undeveloped lands for medium density housing, and a smaller but significant portion for high density housing. The land is subsequently zoned accordingly, permitting a range of residential densities and housing types. The most recent *2008 Comprehensive Plan Update* was adopted in February 2009 with amendments in November 2009, March 2011, April 2011, March 2012, and March 2014. The Land Development Plan specifically identifies a range of residential land uses from low density to high density throughout the City. The plan continues to recommend a range of residential densities and focuses specifically on housing in one chapter.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The City of Dover is currently working on several revitalization and housing initiatives in collaboration with other local housing providers that will assist in reducing the barriers to affordable housing. The following is an outline of incentives and goals to promote affordable housing in the City of Dove within the designated target areas:

#### **Incentives**

- Provide up to 20% cash rebate for qualifying construction projects (capped at \$1 million/property)
- A transfer tax rebate of the buyer's portion of the real estate tax upon issuance of a Certificate of Occupancy
- Waiver of building, plumbing, mechanical and fire protection permit fees
- Waiver of City sewer and water impact fees
- 10 year abatement of property tax on the value of improvements
- Up to \$20,000 in down payment cost to purchase affordable housing

- Property tax abatement for first-time homebuyers who purchase property in the Redevelopment Target Area that occupy the home as their principal residence for four years

### **Goals**

- Encourage greater zoning flexibility to enable infill housing development in the Downtown Redevelopment District by relaxing setback and block standard requirements to allow condominiums and townhouse styles of housing.
- Explore land banking and land trust options for assembling parcels and redevelopment efforts.
- Strengthen existing housing by expanding the Home Repair Programs

## **SP-60 Homelessness Strategy – 91.215(d)**

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

The City of Dover will continue to support programs that service the homeless by providing CDBG funding to agencies whose mission is to assist those that are homeless and unsheltered through rapid rehousing, rental assistance and operating cost for emergency shelters.

### **Addressing the emergency and transitional housing needs of homeless persons**

There are agencies within the City of Dover that provide both emergency shelter and transitional housing. Code Purple was established in the fall of 2014 that provides shelter for homeless persons in Kent County when the temperature or wind chill drops below 32 degrees. When Code Purple is in effect, the homeless are guided to emergency shelters and participating churches within the City of Dover and throughout Kent County that provide warm beds and hot meals.

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

Over the next five years, the City of Dover will provide CDBG funding to the Connections Community Support Program that will provide rapid rehousing/rental assistance to support the homeless population and those that are at risk of becoming homeless transition to permanent supportive housing and independent living. In addition, the Delaware Continuum of Care (CoC) provides supportive services as well as the State Division of Health and Social Services.

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

The local and State housing providers will continue to provide support to the population identified. In addition, the Individualized Assessment, Discharge, and Planning Team (IADAPT) was established in 2010 to provide inmates with advocates that will assist them with mainstream resources once they are discharged and reduce recidivism.

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

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

Currently, the State of Delaware Department of Public Health enforces lead based paint abatement within the City of Dover. Under the State's program, families with children who have been diagnosed by the Public Health centers with lead poisoning are referred to a State Lead Based Paint Inspector. The inspector then performs the relevant technical analysis of the family's residence. If lead based paint is discovered, abatement is required. The City of Dover Department of Planning and Inspections acts in partnership with the State in assuring that lead paint hazards are reduced or eliminated, and that affected housing units are brought up to code.

The City currently requires lead-based paint testing and interim controls in conjunction with its CDBG rehabilitation program. The City of Dover Department of Planning and Inspections does not have the equipment necessary to accurately identify lead-based paint during housing inspections.

In addition to the activities of the City of Dover and the State of Delaware Department of Public Health, the Dover Housing Authority has been active in lead based paint abatement in the City. The Dover Housing Authority has tested and abated lead-based paint in all its public housing units. The Dover Housing Authority also deals with the lead paint hazards in private rental units through the enforcement of the Housing Quality Standards in conjunction with its Section 8 Rental Certificate/ Rental Voucher Program

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

The City of Dover provides information and training to staff who administer the Homeowner Rehabilitation Program to ensure the proper procedures are administered and that residents are properly educated on the dangers of lead based paint hazards.

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

For all rehabilitation projects that qualify for lead base paint testing and hazards, the City will take the necessary actions in order to reduce lead base paint hazards in accordance with HUD regulations and monitor the programs for compliance that carry out rehabilitation projects.



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

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

Based on 2009-2013 Census Data approximately 18.5% of Dover's population lived below the poverty level. This percentage was somewhat higher than surrounding areas in Kent County (which had 8.1% of the population below poverty level) and higher than the average for the State of Delaware (11.7%). Clearly, there is a concentration of persons living below the poverty level in Dover.

To address poverty within the City of Dover, a multi-faceted Anti-Poverty Strategy will be described below. This strategy stresses partnership with and the support of other agencies and organizations. Within the City of Dover there are two full service housing authorities, and various social service agencies which need and deserve the City's support. In addition to these service providers, the City of Dover will direct revitalization, economic development, and code enforcement efforts at low to moderate income neighborhoods. This will provide quality places for people in these neighborhoods to live and work, and provide them with new and better opportunities to earn a living.

The following are the four main elements of the City of Dover's Anti-Poverty Strategy:

- Highest Priority Given to Funding Proposals which Address or Fight Poverty: The City of Dover's PR&CE Committee will give the highest priority in the Five Year Plan to proposals which are targeted towards those living in poverty. These proposals must be consistent with one or more of the following Priorities identified in this plan:
  - Encourage Affordable Owner Occupied Housing in Low to Moderate Income Areas
  - Improve Quality of Housing Stock
  - Aid in Economic Opportunities in Low to Moderate Income Areas
- Support Family Self-Sufficiency Programs and other Resident Initiatives/Counseling Programs at Dover's Housing Authorities: Both the Delaware State Housing Authority and the Dover Housing Authority provide their residents with support and assistance in job training, parenting, counseling, financial management, and other skills. These programs are integrated in the housing programs through the Family Self-Sufficiency Program and/or other Resident Initiatives. It is the position of the City of Dover that these programs provide excellent opportunities for those in public housing to become economically and socially self-sufficient. The City of Dover will provide assistance and support as requested to encourage the continuance of these programs.

- Support the Various Social Service Providers that serve Dover's poor: There is a network of service providers presently operating in Dover that serve the City's poor. These providers include The State of Delaware Division of Health and Social Services and the State Service Centers. There are also numerous non-profit corporations within the City, including the House of Pride and People's Place and Dover Interfaith Mission to the homeless. The City will support the missions and the functions of these organizations by providing technical and planning support, and when possible implementing physical improvements to infrastructure, which serves these facilities.
- Economic Development: The only way to solve the problem of poverty is to help families earn more money. To do so, there must be an abundant supply of jobs available to low and moderate income persons. It is the strategy of the City to use multiple approaches to job creation.

Through the Downtown Dover Partnership encourages the development and expansion of businesses in the Downtown Area. A special focus should be firms, which provide jobs for low to moderate-income persons. Job creation in the Downtown area will serve the dual goals of maintaining and enhancing the older buildings in this historic area, and providing employment in close proximity to a low to moderate income neighborhood.

The Central Delaware Chamber of Commerce encourages the development of new business elsewhere in the Dover area. The attraction and retention of new corporations and manufacturing firms to Dover will provide additional jobs for low to moderate-income persons. One opportunity for new business location is the Garrison Oak Technology Park.

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

The City of Dover has an Economic Development department that does not utilize CDBG funds for targeted projects within the City. The Economic Development Department has several initiatives and incentives in place that will assist in reducing poverty in the City. The City will continue to provide CDBG funds to address the needs of the low and moderate income persons by focusing on homeownership assistance, homeowner rehabilitation, public service needs and public facility improvements.

## **SP-80 Monitoring – 91.230**

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

The City monitors CDBG activities on a consistent basis through client data, expense reports and subrecipient activities, and annually through Monitoring Site Visits to determine if the subrecipient is in compliance with HUD regulations and program agreements. The monitoring process includes identifying any areas of non-compliance in carrying out program activities and provides corrective actions to the sub-recipient to become compliant with the program guidelines. CDBG administrative staff will continue to provide technical assistance to subrecipients and monitor financial compliance to ensure program funds are expended in a timely manner.

## **Expected Resources**

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

#### **Introduction**

The City of Dover receives the Community Development Block Grant (CDBG) from the United States Department of Housing and Urban Development (HUD).

Since CDBG resources are very limited, the City coordinates projects with other city departments, State and Local Housing Authorities and partners with non-profit and private organizations that have multiple resources that will aid in meeting the goals and objectives of the Consolidated Plan.

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	federal	Acquisition Admin Homeowner Rehab Homebuyer Assistance Public Facility Improvements Rapid Re-housing (rental assistance) Public Services	\$220,717	\$8,554	0	\$229,271	\$917,084	Expected amount includes a reduction in grant funding over a four year period.

Table 53 - 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

There is not a match requirement for CDBG funds; however, sub-recipient agencies that were funded have additional resources to supplement their projects. In addition, there are several initiatives and investment projects in the City where CDBG funds will be used as an additional resource to supplement funding these projects.

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

Two lots owned by the City were sold to Habitat for Humanity below market rate to build affordable housing for very low income families. In addition, Habitat has purchased additional lots and properties within the City in which new housing will be constructed and existing housing renovated to provide affordable housing to very low income families.

### **Discussion**

This section is optional and was left blank intentionally.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HP-1 Homeless/ Rapid Re-housing	2015	2016	Homeless	City-wide	Homeless Rapid Re-housing Provide motel vouchers	CDBG: \$7,391	Tenant Based Rental Assistance/Rapid Re-housing 10 households assisted
2	HP-2 Homeless Prevention	2015	2016	Homeless	City-wide	Homeless Prevention	CDBG: \$27,000	Provide shelter for 170 homeless men annually
3	AH-1 Affordable Housing	2015	2016	Affordable Housing	City-wide/ Target Area	Homebuyer Assistance	CDBG: \$60,000	Direct Financial Assistance to Homebuyers: 4 households assisted
4	AH-2 Affordable Housing	2015	2016	Affordable Housing	City-wide	Housing Stock Rehabilitation	CDBG \$88,154	Homeowner Rehabilitation : 5 Household units Emergency Repairs: 10 Household units assisted
5	AH-3 Affordable housing	2015	2016	Affordable Housing	City-Wide/ Target Area	Housing Stock Rehabilitation	CDBG \$40,000	Renovate one single family home
6	PF-4 Public Facility Improvements	2015	2016	Affordable Housing	City-wide	Public Facility Improvements	CDBG \$6,726	Renovations to homeless shelter, 710 persons served

**Table 54 – Goals Summary**



## Goal Descriptions

	<b>Goal Name</b>	Homeless /Rapid Re-Housing
1	<b>Goal Description</b>	Meet the needs of persons that are homeless or at risk of homelessness by providing rental assistance to obtain affordable housing and provide motel vouchers for temporary housing to prevent homelessness.
2	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Meet the needs of men that are homeless by providing shelter and assist in providing permanent supportive housing.
3	<b>Goal Name</b>	Affordable Housing/Homeownership Assistance
	<b>Goal Description</b>	Increase homeownership by providing down payment and closing cost to low income persons who purchase affordable housing in the City.
4	<b>Goal Name</b>	Affordable Housing /Preserve the Existing Housing Stock
	<b>Goal Description</b>	Rehab owner occupied housing that is in violation of the City's Housing Code and complete emergency home repairs that will eliminate health and safety hazards in order to preserve the existing housing stock in the City.
5	<b>Goal Name</b>	Public Facilities and Improvements
	<b>Goal Description</b>	Renovations will be completed on public facilities that service low income persons.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The 2015 Action Plan is a supplementary document to the Five Year Consolidated Plan (2015-2019). The goals and objectives focus on developing and sustaining viable communities and improving low and moderate income persons are addressed in the Consolidated Plan as part of the strategy for addressing the needs of low and moderate income people.

#### Projects

#	Project Name
1	Dover Interfaith Mission for Housing
2	Connections Community Support Program
3	Homeownership Assistance Program
4	Milford Housing Homeowner Rehabilitation Program
5	Milford Housing Emergency Home Repair Program
6	Central Delaware Habitat for Humanity
7	Peoples Place Emergency Homeless Shelter

**Table 55 – Project Information**

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

The projects that were selected were based on the highest ranking priorities that were determined from public hearings and a Housing and Community Development Online Survey identified by residents, local government officials and housing providers. The obstacle in addressing the underserved need is the lack of adequate funding to continue to address these needs.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	Dover Interfaith Mission for Housing
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homelessness Operating Cost
	<b>Funding</b>	\$27,000
	<b>Description</b>	CDBG funds will be utilized for operating cost for the shelter that will include utilities, maintenance and lease cost.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	170 men annually
<b>2</b>	<b>Name Project</b>	Connections Community Support Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Homeless Prevention Affordable Housing
	<b>Funding</b>	\$7,391
	<b>Description</b>	CDBG funds will be used to provide rapid re-housing/rental assistance services for homeless households within the city.
	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10

3	<b>Project Name</b>	Homeownership Assistance Program
	<b>Target Area</b>	Downtown Development District Target Area/ City-Wide
	<b>Goals Supported</b>	Affordable Housing/ Encourage Owner-Occupied Housing in low income areas
	<b>Needs Addressed</b>	Housing and Community Development
	<b>Funding</b>	\$60,000
	<b>Description</b>	CDBG funds will be used to provide homeownership assistance to first-time homebuyers who purchase affordable housing in the Downtown Development District Target Area.
	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4-6 families
4	<b>Name Project</b>	Milford Housing Homeowner Rehabilitation Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing/ Preserving the Existing Housing Stock
	<b>Needs Addressed</b>	Housing and Community Development
	<b>Funding</b>	\$52,892
	<b>Description</b>	CDBG funds will be used to rehabilitate existing owner occupied housing in the City that is in violation of the City's Housing Code.
	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4-5 families
5	<b>Project Name</b>	Milford Housing Emergency Repair Project
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing / Preserving Existing Housing Stock
	<b>Needs Addressed</b>	Housing and Community Development

	<b>Funding</b>	\$35,262
	<b>Description</b>	CDBG funds will be used to provide emergency home repairs to owner occupied homes to eliminate housing conditions that threaten the health and safety of low income homeowners.
	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15
<b>6</b>	<b>Project Name</b>	Central Delaware Habitat for Humanity
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Affordable Housing/ Preserving Existing Housing Stock
	<b>Needs Addressed</b>	Housing and Community Development
	<b>Funding</b>	\$40,000
	<b>Description</b>	CDBG funds will be used to rehabilitate and existing home acquired by Habitat to sale to a family that is 60% below the Area Median Income.
	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 family
<b>7</b>	<b>Project Name</b>	Peoples Place Whatcoat Homeless Shelter
	<b>Target Area</b>	City- Wide
	<b>Goals Supported</b>	Public Facility Improvements
	<b>Needs Addressed</b>	Housing and Community Development
	<b>Funding</b>	\$6,726
	<b>Description</b>	CDBG funds will be utilized for minor renovations to a facility that shelters the homeless.

	<b>Target Date</b>	6/30/16
	<b>Estimate the number and type of families that will benefit from the proposed activity</b>	710 annually

## **AP-50 Geographic Distribution – 91.220(f)**

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

Maps have been included of the Downtown Target Area and the Downtown Development District where CDBG funds have been allocated for Homeownership Assistance which is primary a low income area with a high concentration of African Americans. Funding for the remainder of projects will be used city-wide.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Downtown Target Area	<b>27%</b>

**Table 56 - Geographic Distribution**

#### **Rationale for the priorities for allocating investments geographically**

The purpose of the target block approach is to concentrate resources available to the public, private, and non-profit sectors for housing programs in a specific area (known as the Target Area). The Target Area consists of one of Dover's oldest working class neighborhoods located in west central Downtown. This concentrated approach is to insure the likelihood of an immediate visual impact and long-term stabilizing effect of each area. A map of the Target Area is attached.

The major element of the Target Block Program will be concentrated home-to-home internal inspection to determining deficiencies which need to be corrected. Substandard housing requiring plumbing, electrical update to meet the Dover Building Code, but which is basically sound and suitable for rehabilitation has been targeted. A sufficient number of low and moderate income families must reside in the area.

The City has allocated all of its CDBG homeownership assistance for FY15 to first-time homebuyers who purchase affordable housing in the target area which will coincide with the other incentives the City is offering through the Downtown Development District Program. The percentage of funds utilized in the Target Area could possibly increase based on homeowner rehabilitation needs in the Target Area.

The City will continue to affirmatively further fair housing by maintaining a balance of providing CDBG assistance in impacted and non-impacted areas of the City.

## Affordable Housing

### **AP-55 Affordable Housing – 91.220(g)**

#### **Introduction**

Housing is needed for all income levels but there is a greater need for affordable housing for low and very low income persons in the City of Dover.

Over the past 11 years, the rental rates in Dover have increased over 49% and most likely will continue to rise over time with a decrease in affordable rental housing units. The median home value had an even higher increase by 80% from 2000 to 2011. With home values expected to rise over time, affordable housing will become an issue if production of affordable housing is not constructed over time.

The Fair Market Rent for a 2 bedroom rental unit is higher than the most recent median contract rent by \$206. This presents an issue for persons that do not live in subsidized housing that are low income and paying over 50% of their income on housing. With the lack of affordable rental housing, it will also be difficult for persons with Housing Choice Vouchers to find suitable housing.

The City of Dover is collaborating with other local housing providers on several initiatives to provide affordable housing in low to moderate income target areas as well as city-wide by providing homeownership assistance to first time home buyers who purchase properties within the City of Dover and designated target areas, provide real estate tax relief over a 4 year period for persons that purchase properties within the designated target area, receive a transfer tax rebate for properties upon issuance of a Certificate of Occupancy for properties purchased after March 1, 2015 within the designated target area, and partnering with non-profits that will be constructing affordable housing for low income persons over the next few years.



<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	190
Non-Homeless	0
Special-Needs	0
Total	190

**Table 57 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	5
The Production of New Units	0
Rehab of Existing Units	15
Acquisition of Existing Units	0
Total	20

**Table 58 - One Year Goals for Affordable Housing by Support Type**

## **Discussion**

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Dover Housing Authority (DHA) is the local Housing Authority that serves the City of Dover. DHA has a total of 374 public housing units available for occupancy including 31 scattered site units. The majority of these units are 3 bedrooms. DHA also provides rental assistance to low and moderate income persons through HUD's Section 8 Program. Presently there are 174 housing choice vouchers under lease and tenant based which means they are only offered to tenants on DHA's waiting list.

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

DHA conducts an annual and a 5-year Physical Needs Assessment of their public housing inventory to determine the public housing needs. Projects are prioritized by the greatest need and completed with funding from their Capital Fund Program and their Operating Subsidy funds.

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

Dover Housing Authority provides their residents with support and assistance in job training, parenting, counseling, financial management and other skills. These programs are integrated in the housing programs through the Family Self-Sufficiency Program and/or other Resident Initiatives. It is the position of the City of Dover that these programs provide excellent opportunities for those in public housing to become economically and socially self-sufficient. DHA also provides homeownership opportunities through their Section 8 program, where the resident applies 30% of their income towards their mortgage for the first fifteen years of owning their home and DHA pays the remaining 70%. After fifteen years, the resident pays 100% of their mortgage.

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

Not applicable

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

### **Introduction**

The City of Dover fully supports the Homeless Planning Council of Delaware challenge to End Chronic Homelessness. The City will continue to provide CDBG funding to agencies and organizations that service the homeless and those with special needs.

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

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

The City has provided CDBG funding to Connections Community Support Program to provide rapid rehousing/ rental assistance for up to three (3) homeless households within the City of Dover. The City also accepted the Mayor's Challenge to End Veterans Homelessness in Dover by December 2015. The first goal is to house 22 veterans by June 2015 which has been accomplished by the working groups of this initiative.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City has provided CDBG funding to two local emergency shelters for operating and renovation cost that will assist in maintaining safe, decent and affordable housing. Code Purple was established in the fall of 2014 that provides shelter for homeless persons in Kent County when the temperature or wind chill drops below 32 degrees. When Code Purple is in effect, the homeless are guided to emergency shelters and participating churches within the City of Dover and throughout Kent County that provide warm beds

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

Over the next five years, the City of Dover will provide CDBG funding to the Connections Community Support Program that will provide rapid rehousing/rental assistance to support the homeless population and those that are at risk of becoming homeless transition to permanent supportive housing and independent living. In addition, the Delaware Continuum of Care (CoC) provides supportive services as well as the State Division of Health and Social Services.

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

The local and State housing providers will continue to provide support to the population identified. In addition, the Individualized Assessment, Discharge, and Planning Team (IADAPT) was established in 2010 to provide inmates with advocates that will assist them with mainstream resources once they are discharged and reduce recidivism.

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

**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**

At this time, it is the City of Dover’s contention that there are no significant barriers to affordable housing which describes dwelling units whose total cost are deemed affordable to those who have a median income. However, there are few constraints that may be an obstacle in constructing affordable housing such as development impact fees which increases the cost to develop new housing, land use policies outlined in the City’s Comprehensive Plan, and building and zoning codes.

Unlike many communities, Dover has not practiced “exclusionary zoning” where most of the undeveloped land is designated for large lot single family detached homes. To the contrary, The Dover Plan (Dover’s Comprehensive Plan) designates a large portion of undeveloped lands for medium density housing, and a smaller but significant portion for high density housing. The land is subsequently zoned accordingly, permitting a range of residential densities and housing types. The most recent *2008 Comprehensive Plan Update* was adopted in February 2009 with amendments in November 2009, March 2011, April 2011, March 2012, and March 2014. The Land Development Plan specifically identifies a range of residential land uses from low density to high density throughout the City. The plan continues to recommend a range of residential densities and focuses specifically on housing in one chapter.

## **AP-85 Other Actions – 91.220(k)**

### **Actions planned to address obstacles to meeting underserved needs**

The greatest obstacle in meeting the undeserved needs for the City are lack of federal, state and other sources of funding and the lack of affordable housing. In addition, the City's Downtown Target Area has the highest concentration of low to moderate income residents with aging homes in need of housing rehabilitation with only a 25% homeownership rate in this area.

The following is an outline of incentives to promote affordable housing in the City of Dover within the designated target areas:

#### **Incentives**

- Provide up to 20% cash rebate for qualifying construction projects (capped at \$1 million/property)
- A transfer tax rebate of the buyer's portion of the real estate tax upon issuance of a Certificate of Occupancy
- Waiver of building, plumbing, mechanical and fire protection permit fees
- Waiver of City sewer and water impact fees
- 10 year abatement of property tax on the value of improvements
- Up to \$20,000 in down payment cost to purchase affordable housing

### **Actions planned to foster and maintain affordable housing**

The following are goals that the City will focus on to foster and maintain affordable housing:

- Encourage greater zoning flexibility to enable infill housing development in the Downtown Redevelopment District by relaxing setback and block standard requirements to allow condominiums and townhouse styles of housing.
- Explore land banking and land trust options for assembling parcels and redevelopment efforts.
- Strengthen existing housing by expanding the Home Repair Programs

### **Actions planned to reduce lead-based paint hazards**

Currently, the State of Delaware Department of Public Health enforces lead based paint abatement within the City of Dover. Under the State's program, families with children who have been diagnosed by the Public Health centers with lead poisoning are referred to a State Lead Based Paint Inspector. The inspector then performs the relevant technical analysis of the family's residence. If lead based paint is discovered, abatement is required. The City of Dover Department of Planning and Inspections acts in partnership with the State in assuring that lead paint hazards are reduced or eliminated, and that affected housing units are brought up to code.

The City currently requires lead-based paint testing and interim controls in conjunction with its CDBG rehabilitation program. The City of Dover Department of Planning and Inspections does not have the equipment necessary to accurately identify lead-based paint during housing inspections.

In addition to the activities of the City of Dover and the State of Delaware Department of Public Health, the Dover Housing Authority has been active in lead based paint abatement in the City. The Dover Housing Authority has tested and abated lead-based paint in all its public housing units. The Dover Housing Authority also deals with the lead paint hazards in private rental units through the enforcement of the Housing Quality Standards in conjunction with its Section 8 Rental Certificate/ Rental Voucher Program

The City of Dover provides information and training to staff who administer the Homeowner Rehabilitation Program to ensure the proper procedures are administered and that residents are properly educated on the dangers of lead based paint hazards.

For all rehabilitation projects that qualify for lead base paint testing and hazards, the City will take the necessary actions in order to reduce lead base paint hazards in accordance with HUD regulations and monitor the programs for compliance that carry out rehabilitation projects.

### **Actions planned to reduce the number of poverty-level families**

The City of Dover will provide CDBG funding over the next five years to projects that will reduce the number of poverty level families by addressing the most critical needs of families, such as providing rapid rehousing and rental assistance to the homeless, providing funding and support to emergency shelters, providing homeownership assistance to qualifying families who purchase affordable housing in the City of Dover, and complete homeowner rehabilitation and emergency homes repairs to owner occupied homes of

low and very low income families in the City.

#### **Actions planned to develop institutional structure**

The main gap that exists in the Institutional Delivery System is the lack of affordable rental housing. The public housing waiting list for Dover Housing Authority has 843 applicants and 635 applicants on the Section 8 waiting list. The average person remains on the waiting list for up to 4 years which increases the risk of homelessness and suffers from a severe housing cost burden paying over 50% of their income in rent.

The strategy for overcoming gaps in the institutional structure is to continue to provide CDBG funding and support to the existing service and housing providers that service the needs of low income persons and those with special needs. In addition, the City will continue to work collaboratively with non-profits and the State and local housing authorities on initiatives that support affordable housing in the City of Dover.

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

The City will continue to collaborate with public and private housing providers and social service agencies to meet the goals and objectives of the Consolidated Plan. The Community Development Administrator is a representative on several boards and commissions throughout the State that service the needs of low to moderate income persons.



## Program Specific Requirements

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

#### 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	8,554
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	8,554

#### 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%

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> US Census Data
	<b>List the name of the organization or individual who originated the data set.</b> Interface Studio
	<b>Provide a brief summary of the data set.</b> The consultants conducted a door to door survey to all residents within the revitalization area. The survey gathered data on the housing and community development needs of the neighborhood, as well as basic demographic information.
	<b>What was the purpose for developing this data set?</b> This data was developed to determine the needs for the Central Dover Revitalization Initiative.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Concentrated in one geographical area.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> April 2014
	<b>What is the status of the data set (complete, in progress, or planned)?</b> completed

# City of Dover

MAYOR AND COUNCIL

## COUNCIL RESOLUTION NO. 2015-08

### **A RESOLUTION APPROVING THE 2015-2019 COMMUNITY DEVELOPMENT BLOCK GRANT CONSOLIDATED PLAN**

WHEREAS, the City of Dover is entitled to \$220,717 through the United States Department of Housing and Urban Development Community Development Block Grant program; and

WHEREAS, the City of Dover has prepared the 2015-2019 Consolidated Plan, in accordance with the United States Department of Housing and Urban Development guidelines, that serve as the primary planning document for identifying and meeting the housing and community development needs for the low and moderate-income residents of Dover; and

WHEREAS, the City of Dover is in favor of utilizing the Community Development Block Grant funds for the community development purposes in accordance with the National Community Development objectives of benefiting low and moderate income families, eliminating slums and blight, and meeting other community development objectives; and

WHEREAS, the United States Department of Housing and Urban Development requires the City of Dover to submit a Consolidated Plan and an Action Plan for Application for Federal Assistance including the proposed use of funds and including certain certifications and policies to obtain its \$220,717 entitlement; and use of \$8,554 in program income for eligible activities; and

NOW, THEREFORE BE IT RESOLVED THAT THE MAYOR AND COUNCIL OF THE CITY OF DOVER APPROVE THE 2015-2019 Community Development Block Grant Consolidated Plan and application for Federal Assistance included in the Consolidated Plan, along with certifications and policies attached and authorize its forwarding to the United States Department of Housing and Urban Development for consideration.

ADOPTED: May 11, 2015

  
MAYOR

  
COUNCIL PRESIDENT

# Application for Federal Assistance SF-424

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision		<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>	
<b>* 3. Date Received:</b> <input type="text"/>		<b>4. Applicant Identifier:</b> <input type="text"/>			
<b>5a. Federal Entity Identifier:</b> <input type="text"/>			<b>5b. Federal Award Identifier:</b> <input type="text"/>		
<b>State Use Only:</b>					
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>			
<b>8. APPLICANT INFORMATION:</b>					
<b>* a. Legal Name:</b> <input type="text" value="City of Dover"/>					
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="51-6000092"/>			<b>* c. Organizational DUNS:</b> <input type="text" value="0770936640000"/>		
<b>d. Address:</b>					
<b>* Street1:</b>		<input type="text" value="15 loockerman Plaza"/>			
<b>Street2:</b>		<input type="text"/>			
<b>* City:</b>		<input type="text" value="Dover"/>			
<b>County/Parish:</b>		<input type="text"/>			
<b>* State:</b>		<input type="text" value="DE: Delaware"/>			
<b>Province:</b>		<input type="text"/>			
<b>* Country:</b>		<input type="text" value="USA: UNITED STATES"/>			
<b>* Zip / Postal Code:</b>		<input type="text" value="19901-7327"/>			
<b>e. Organizational Unit:</b>					
<b>Department Name:</b> <input type="text" value="Planning Department"/>			<b>Division Name:</b> <input type="text" value="Planning &amp; Inspections Dept"/>		
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>					
<b>Prefix:</b>		<input type="text" value="Mrs."/>		<b>* First Name:</b> <input type="text" value="Tracey"/>	
<b>Middle Name:</b>		<input type="text" value="N"/>			
<b>* Last Name:</b>		<input type="text" value="Harvey"/>			
<b>Suffix:</b>		<input type="text"/>			
<b>Title:</b> <input type="text" value="Planner"/>					
<b>Organizational Affiliation:</b> <input type="text"/>					
<b>* Telephone Number:</b>		<input type="text" value="(302) 736-7175"/>		<b>Fax Number:</b> <input type="text" value="(302) 736-4217"/>	
<b>* Email:</b> <input type="text" value="tharvey@dover.de.us"/>					

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S.Department of Housing & Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Consolidated Plan 2015-2019

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

## Application for Federal Assistance SF-424

### 16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="220,717.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value="8,554.00"/>
* g. TOTAL	<input type="text" value="229,271.00"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

### Authorized Representative:

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:



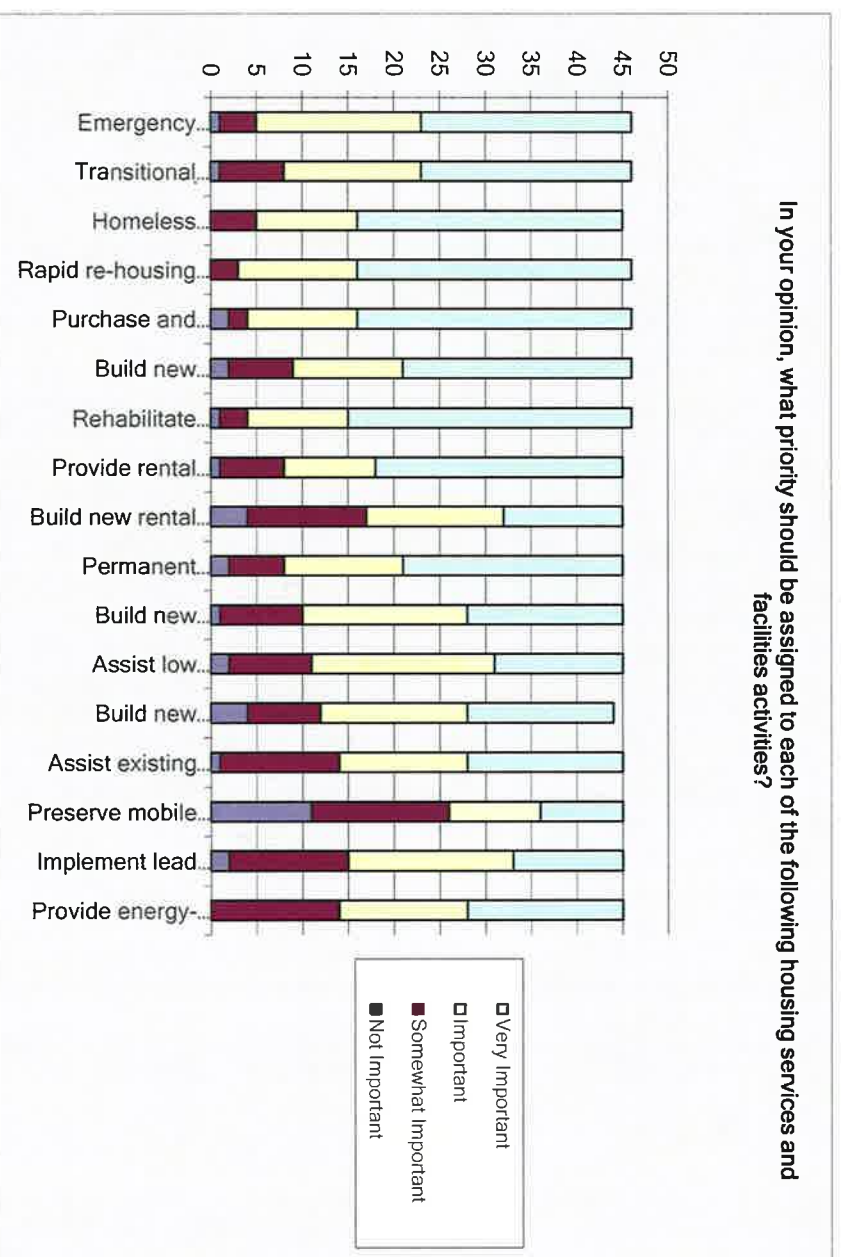
\* Date Signed:

## City of Dover

A total of 62 individuals opened the survey and identified themselves as residents, organizations with service areas in the county outside of Wilmington, or local government officials. On average, 45 responses were provided for Questions 2-9, which posed close-ended questions with a discrete list of possible responses. For the open-ended Questions 11-14, the average response rate was 32 with a range from 27 to 38.

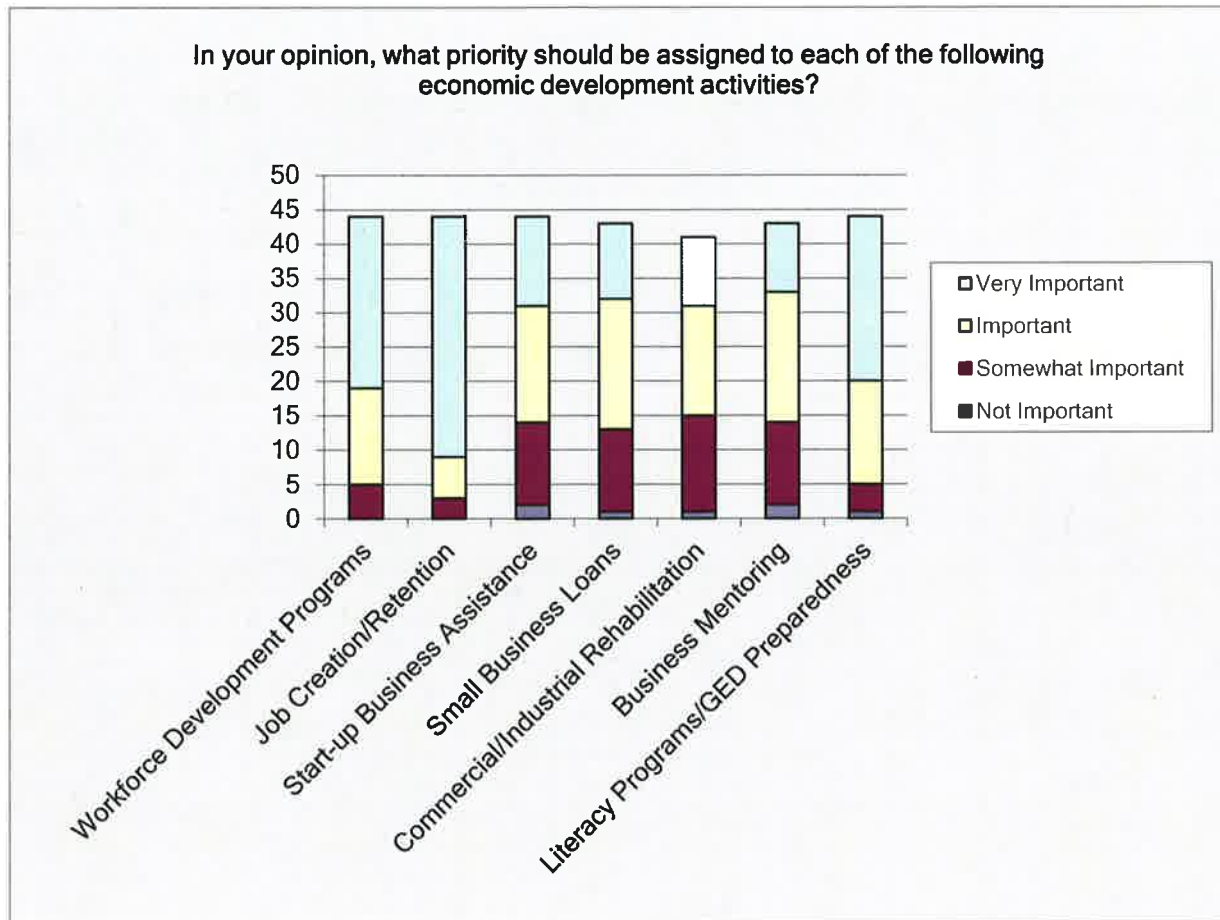
In terms of priorities for housing services and facilities, **initiatives to assist the homeless and those at risk for homelessness ranked the highest** among the 46 respondents, including emergency shelter, rapid re-housing and homeless prevention. Also ranking “very important” and “important” were rehabilitation activities involving rental housing units. The lowest ranked priorities included preserving mobile home communities and the development of new rental housing for large families.

### Dover Question 2.



Among the 44 respondents to Question 3, **job creation/retention, and workforce development along with literacy/GED preparedness programs ranked the highest** as priorities. Activities to assist small businesses (mentoring, start-up assistance and loans) and rehabilitation of commercial/industrial properties ranked lowest.

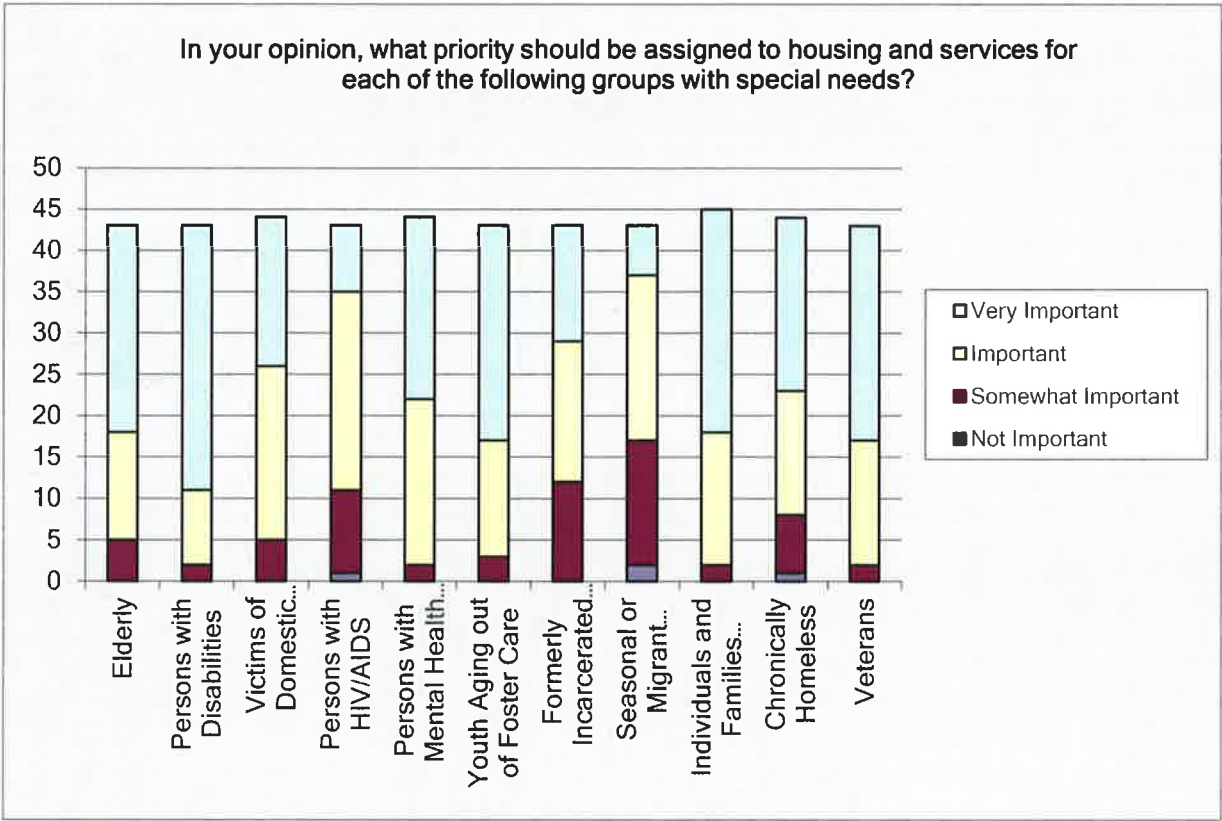
*Dover Question 3.*





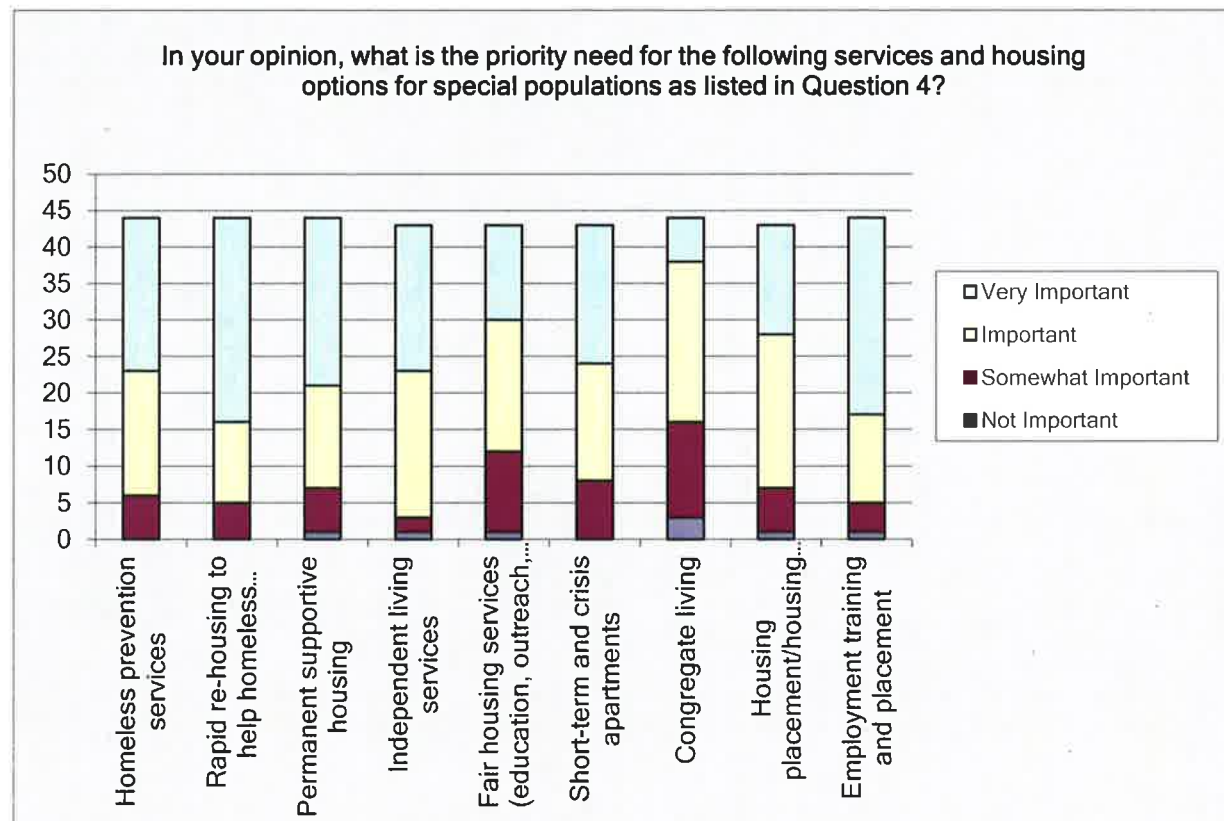
In terms of prioritizing special needs populations, the 45 respondents ranked **persons with disabilities, youth aging out of foster care, individuals and families experiencing homelessness and veterans as the highest priorities.** Seasonal/migrant workers, formerly incarcerated individuals and persons with HIV/AIDS ranked lowest.

*Dover Question 4.*



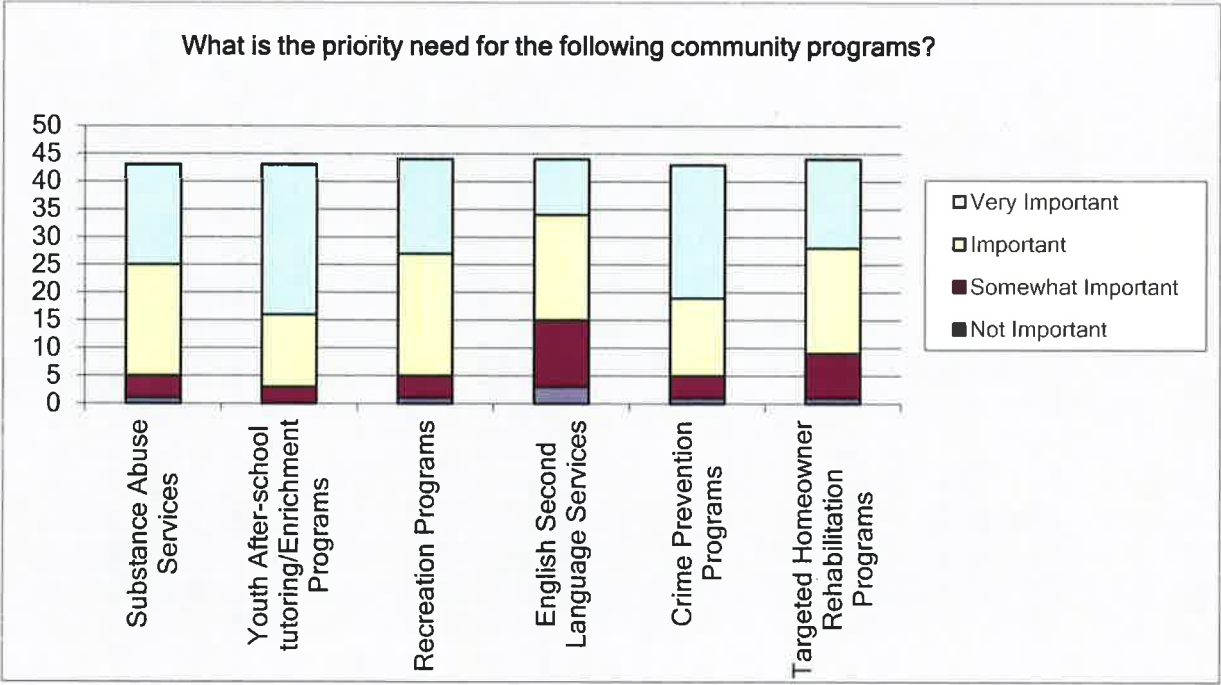
In terms of prioritizing supportive services and housing assistance for special needs populations referenced in Question 4, 45 respondents stated **independent living, rapid re-housing, employment training and placement, homeless prevention and permanent supportive housing** ranked highest. Congregate living ranked lowest.

*Dover Question 5.*



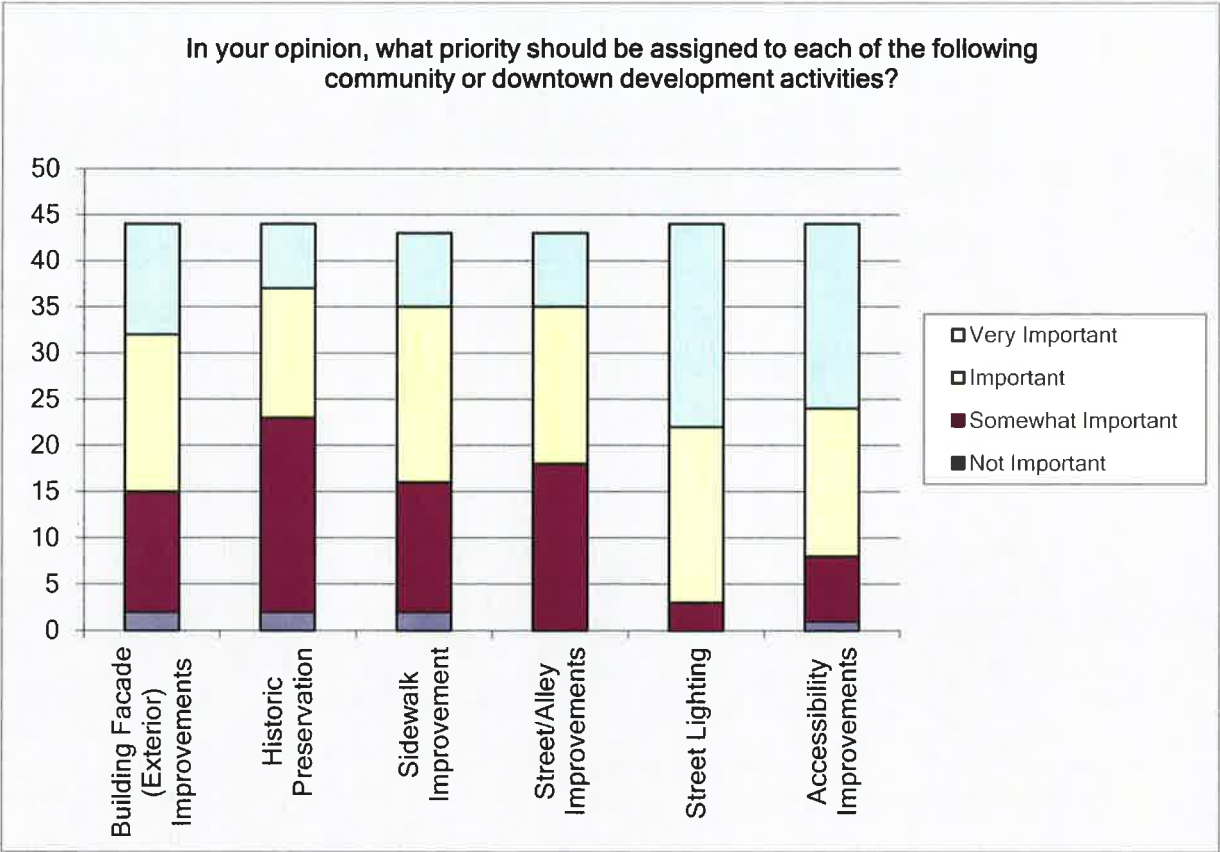
Community programs focusing on **after-school enrichment for youth, substance abuse, recreation and crime prevention ranked highest**; ESL classes and targeted homeowner rehabilitation ranked lowest among the 44 respondents.

Dover Question 6.



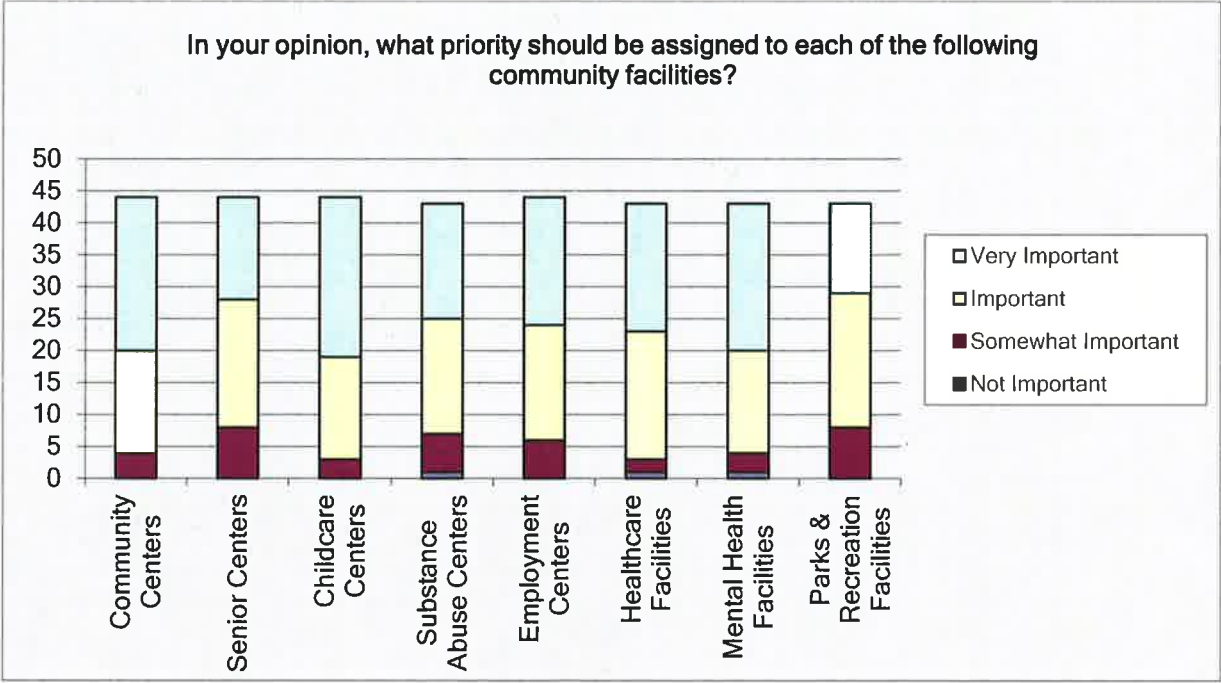
Downtown development or communities including **street lighting and accessibility improvements** ranked **highest** among the 44 respondents while historic preservation ranked lowest.

Dover Question 7.



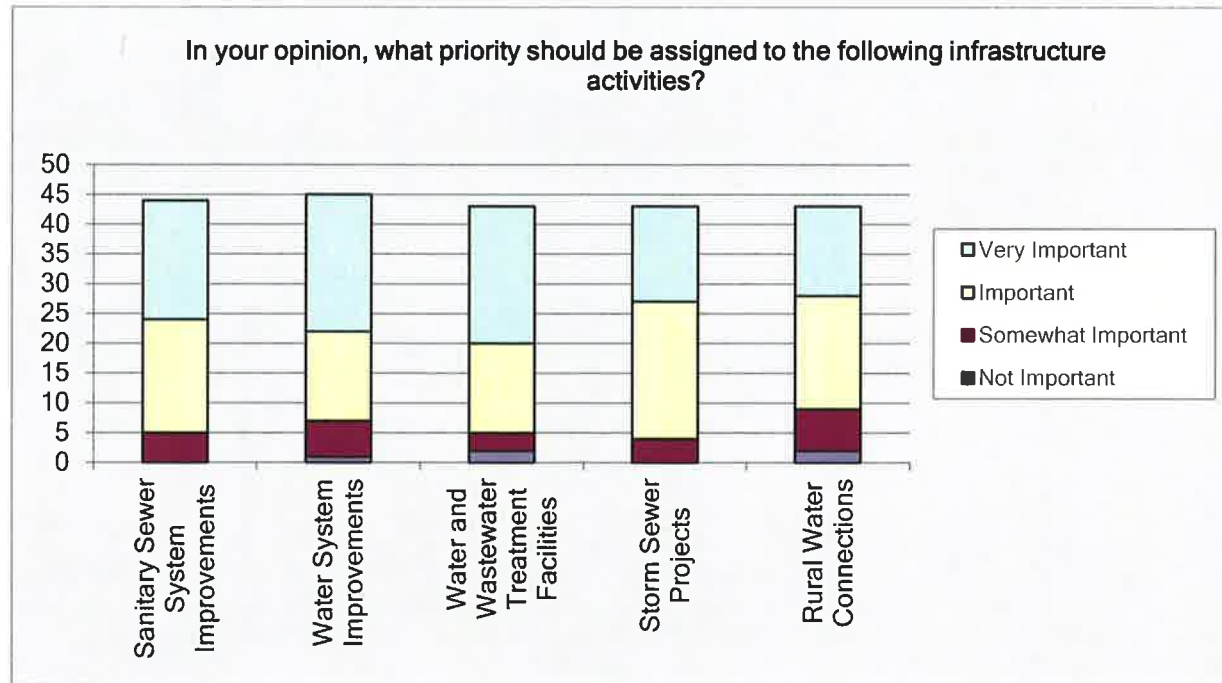
Several community facilities garnered **high priorities** including **health care centers, community centers, child care centers, substance abuse centers, and mental health facilities**. Park and recreation facilities ranked lowest by the 44 respondents.

*Dover Question 8.*



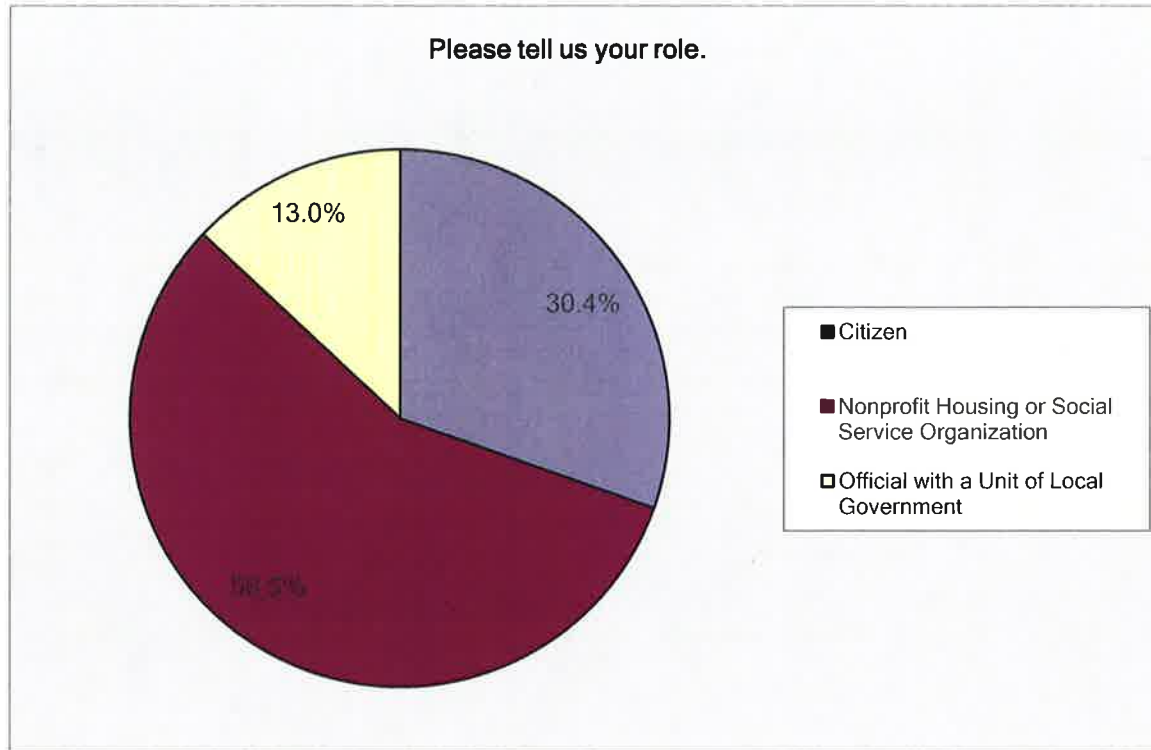
In terms of infrastructure, 45 respondents ranked **improvements involving sanitary sewer systems, water systems, water/wastewater treatment facilities and storm sewer projects nearly equal as high priorities**. Rural water connections ranked lowest.

*Dover Question 9.*



In Dover, of the 46 respondents who completed questions within the survey, more than half were representatives of nonprofit or social service organizations and slightly less than a third were residents. Thirteen percent were representatives of local government.

*Dover Question 10.*



Question 11 asked respondents to identify, in their opinion, the highest priority needs in Delaware for the next 5-10 years. The 38 responses focused on jobs and affordable housing, with a few mentioning crime prevention and substance abuse services.

Question 12 asked if respondents thought priority needs had changed over the past five years. Many of the 34 respondents stated loss of jobs and increasing housing costs as the reasons.

Question 13 inquired about which HUD-funded initiatives have been successful over the past five years. Of the 30 responses, 22 included references to housing activities (rehab, purchase, rental subsidies, etc.).

Question 14 inquired about recommendations to improve the delivery of HUD-funded activities in Delaware, and 27 respondents provided input. Suggestions were across the spectrum, however, from “no improvement needed” to more jobs, more assistance provided to the working poor, more assistance to the elderly, etc.

**Stakeholder Group Interview:** City of Dover CDBG Staff  
**Date:** Wednesday, November 12, 2014  
**Time:** 4:15 – 5:00  
**Location:** Public Library, Dover, DE

**Stakeholder Participating:**  
Tracey Harvey

- Same needs as 5 years ago addresses through CDBG:
  - homelessness
    - just made official announcement to end Veterans homelessness by 2016 in Dover (maybe under 20 people)
    - discussion with one major landlord to rent out units for shared housing
    - working with shelters to give them preference to veterans for vouchers
    - need for transitional housing for homeless vets
  - home ownership assistance
    - increased incentive from \$10k to \$20k for under 80% AMI and below, participants are mostly 50-60%
    - program participants start at NCALL
    - have \$100k this year
    - used to not forgive loans, but now they are forgiven in this program
  - rehab/emergency repair
    - Milford HDC administers this program
  - Elizabeth Murphy School
    - at-risk for homeless children can stay in cottages up to a year, have at least 50 children
    - can stay until age 18
    - in historic area, so funds go to repair older buildings
    - takes children statewide
  - housing counseling through NCALL
  - permanent supportive housing, maybe through DSCLT, for veterans

#### Unmet needs

- infrastructure downtown - used to get funds for 3 years, now city does itself as funds are available
- used to do rental rehab loans, but not enough applicants
- crime rate has risen downtown, but politicians felt police shouldn't get CDBG funds anymore, 5 shootings in past 2 months
- Dover Interfaith Mission and NCALL are the two public service activities
- need for new homeownership opportunities: Habitat for Humanity recently purchased homes in Dover and has a track record for good projects - rehab



**Public Needs Hearing**

**Date:** Wednesday, November 12, 2014  
**Time:** 5:30 – 7:00  
**Location:** Public Library, Dover, DE

**Attendees:**

Tracey Harvey, City of Dover CDBG Program  
Jocelyn Tice, Central DE Habitat for Humanity  
Russell Huxtable, MHDC  
David Szumski, MHDC

**Needs:**

- foreclosures, blighted property, abandoned property
  - homeownership and rehab
- land acquisition for future home ownership, NSP was good for being able to get foreclosed properties and renovate them
- creating mixed-income neighborhoods
- would be good to be able to use CDBG funds for renovation
- land banking: Cannon Mills development still has vacant lots
- asbestos and lead-based paint remediation
- financial literacy - could CDBG funds be used for high school classes?
- Restoring Central Dover plan identified need for youth activities
- encourage collaboration within City's application

**Stakeholder Group Interview:** Kent County Community Development  
**Date:** Thursday, November 13, 2014  
**Time:** 9:00 – 10:30  
**Location:** Kent County Building, Dover, DE

**Stakeholders Participating:**

Albert Biddle - Kent County Planning  
Mary Ellen Gray - Kent County Planning  
Tracey Harvey - City of Dover CDBG  
Sarah Keifer - Director of Planning Kent County  
David Edgell - Circuit Rider, Office of State Planning  
Andy Lorenz - DSHA, State CDBG Kent and Sussex  
Valerie Miller - MHDC

- City of Dover
  - homelessness
    - homeownership assistance - greater need
  - rehabs
    - greater need for emergency repairs
- Kent County
  - same needs mostly as 5 years ago
  - rehabs for mobile homes
    - probably 1/2 of all rehabs done per year through County CDBG
    - household has to own the structure
    - have had repeats, but not many
    - can't use HOME funds for rental lots
    - MHDC: huge need, partly because few agencies will do emergency repairs on rental lots
  - don't get as many calls about homeownership assistance or homelessness, those people call others
  - primarily emphasizes homeowner rehab now
    - around 60-70 projects per year
    - have a 3-4 year waiting list
    - demand is about the same or a little more
  - Infrastructure
    - tough to make public infrastructure projects eligible
    - some towns (ex: Harrington) have infiltration and inflow problems, then they dump into Kent County's system
    - County is applying to NDR funds for low-lying areas
    - just received new flood plain maps, insurance is more expensive, challenge for low-mod families to bring homes up to compliance to get insurance
  - Rental inspections

- areas that used to have high homeownership are now rentals mostly. Towns have trouble managing that transition.
- need now for affordable rental, but towns want more homeownership
- issue is standards for rentals vs owner-occupied
- Dover has rental licensing, towns want a check on rental unit increase
- Rental inspections and licensing not done at county level except on a complaint basis (Sussex Co is same)
- need for rental standards and inspections, could use CDBG for additional code enforcement - Strong Communities meetings have been supportive of idea
- good revenue stream for City of Dover: fee is based on type of unit on an annual basis, city pays for code enforcement
- difficult for County to pay for it: Dover and County each have 4 inspectors
- opportunities for strategic code enforcement in towns and LMI areas?
- new multifamily developments are often not meeting the demands of affordable housing, many are market rate
- single family rental rehab loan
  - would be helpful, especially in combination with enhanced code enforcement
  - when it was done before, marketing of the program was an issue, another issue was upfront cost (\$1,000 cost for loans between \$1k-\$35k)
    - most participants were low-mod income landlords renting to low-mod tenants
    - process was slow
    - participating properties were already near HUD max rents
    - rates not competitive – an owner who wanted to rehab could get similar loan from a bank with less restrictions. Many don't really want to rehab – need to make it an incentive.
  - would not need to be limited by number of units
  - should be for purposes of bringing properties up to code
  - occupants would have to continue to be low-mod income

Date: 11.12.14 Time: 5:30 PM Category: Dover DSHA

[illegible]

# Stakeholder Interviews and Focus Groups

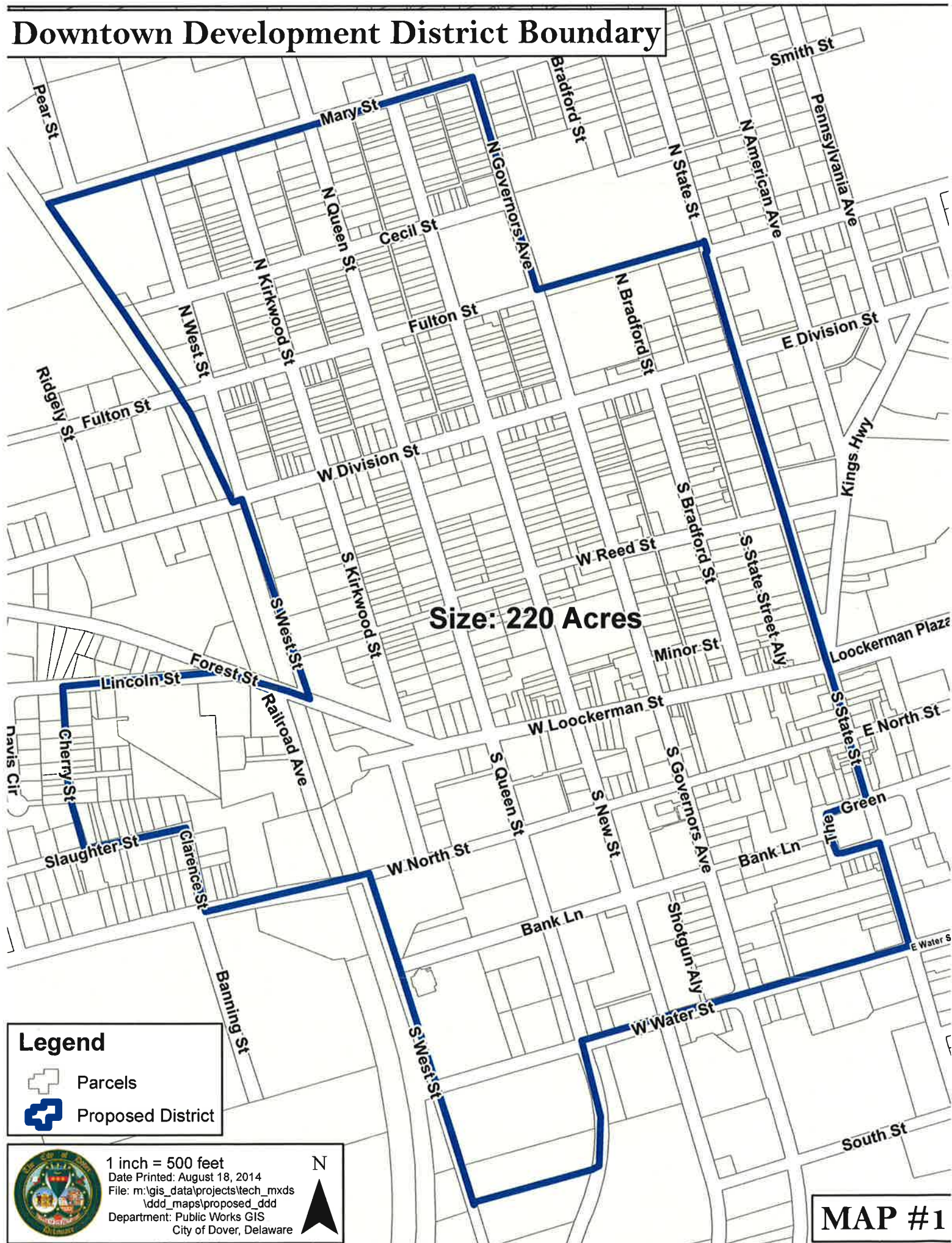
Date: 11.13.14

Time: 9:00-10:30 Category: Kent Co. Comm. Dev.

Name (please print legibly)		Organization	Phone Number & E-mail Address
ANDREW LORENZ		DE State Housing Authority	(302) 739-0261 andy@destatehousing.com
DAVID EDGEU		Office of State Planning Coordination	(302) 739-3090 david.edgeu@state.de.us
Sarah Keifer		Kent County Planning Services	302-744-2471 Sarah.Keifer@co.kent.de.us
Tracey Haney		City of Dover	302-736-7175 thaney@ci.dover.de.us
Mary Ellen Gray		Kent County Planning Services	(302) 744-2471 maryellen.gray@co.kent.de.us
Albert Biddle Jr.		Kent Co. Planning Services	(302) 744-2480 albert.biddle@co.kent.de.us
Valerie Miller		Milford Housing Development Corporation	(302) 422-8255 vmiller@milfordhousing.com



# Downtown Development District Boundary





# City of Dover Consolidated Plan Target Area



## CERTIFICATIONS

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

**Affirmatively Further Fair Housing --** The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan --** It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

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

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

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

**Consistency with plan --** The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3 --** It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

Date 5/12/15



## Specific CDBG Certifications

The Entitlement Community certifies that:

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

**Community Development Plan --** Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan --** It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2015 , 2016 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

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

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

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

 5/12/15  
Signature/Authorized Official Date

Mayor  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING:**

#### **A. Lobbying Certification**

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