



PY20 Action Plan

October 1, 2020 - September 30, 2021

MERIDIAN COMMUNITY DEVELOPMENT BLOCK
GRANT (CDBG) PROGRAM

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Executive Summary

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

1. Introduction

The City of Meridian was designated an Entitlement Community by the U.S. Department of Housing and Urban Development (HUD) in 2007. This designation allows the City to receive funds directly from HUD's Community Development Block Grant (CDBG) Program on an annual basis. The City is currently working under the regulatory Five-Year Consolidated Plan (Con Plan) for program years 2017-2021. The Con Plan describes the anticipated strategies, goals, and community development needs identified during a collaborative process that included input from community members and local entities.

This Action Plan is for the fourth year of the 2017-2021 Con Plan and will provide direction to the City of Meridian CDBG Program (Program) for Program Year 2020 (PY20) which spans from October 1, 2020 – September 30, 2021. The PY2020 Action Plan provides a summary of the actions, activities, and resources that will be used during PY2020 to address the goals and priority needs identified in the 2017-2021 Con Plan.

2. Summarize the objectives and outcomes identified in the Plan

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

The City is focusing its activities and funding during PY2020 on 1) improving accessibility by prioritizing projects that improve residents access to public facilities and community resources; 2) enhancing homeownership opportunities by obtaining or maintaining homes that are affordable; 3) promoting fair housing, and 4) providing social services that provide stability to Meridian residents with a low to moderate income.

3. Evaluation of past performance

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

Since 2007, Meridian has successfully managed over \$3.5 million in resources from its annual CDBG allocation. Over the years, the City's expenditures from its CDBG allocation have focused on supporting social service provider operations such as the Meridian Food Bank, improving community facilities for organizations such as the Boys and Girls Club and Meridian Development Corporation; addressing accessibility barriers to places such as parks and trails, Meridian Libraries, and sidewalk projects; preventing homelessness with emergency assistance through The Jesse Tree of Idaho; and assisting with

homeownership attainment for low- and moderate-income buyers through the Ada County Housing Authority and NeighborWorks Boise.

The City has submitted Consolidated Annual Performance and Evaluation Reports (CAPERs) for all previous program years. The CAPERs demonstrate that the City exceeds the statutory requirement of at least 70 percent of funds expended being invested in activities that benefit low to moderate-income individuals and families. Aside from Program Year 2016, the City has met its expenditure of grant funds deadlines imposed by HUD each year.

All of the prior program years' activities meet critical needs in Meridian. The primary challenges encountered during the last Consolidated Plan period were timing- and contract-related. To address these challenges, the City has implemented more stringent requirements for subrecipients, particularly in meeting expected schedules. Over the last 18 months, the City has been effective at organizing, streamlining, and managing its CDBG processes to provide the most benefit for each CDBG dollar granted while complying with federal timeliness requirements.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The citizen participation process for the PY2020 Action Plan followed the process identified in the City's Citizen Participation Plan, adopted with the 2017-2021 Con Plan. Public comments were accepted from June 19, 2020 to July 21, 2020 with a public hearing being held on July 21, 2020. The City published legal notices in two local newspapers (Idaho Statesman and Meridian Press Tribune) and posted the draft Action Plan on the City's website on June 19, 2020. Presentations of the draft Action Plan and included projects were provided to stakeholders at the City Council meetings on July 7, 2020 and July 21, 2020.

To broaden public participation in the development of the plan, the City coordinated with several organizations that work with LMI populations to gain a better understanding of the community needs and identify projects that would be beneficial to the residents of Meridian. The feedback received supported the goals and strategies identified in the 2017-2021 Con Plan. Invitations to apply were provided through e-mails, phone calls, and publication announcements on the City website, Boise City/Ada County Continuum of Care (CoC) distribution list, Region 4 Behavioral Health Board distribution list, and in the local newspapers.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City received multiple comments supporting the CDBG Program and its PY20 Action Plan.

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

n/a

7. Summary

The City of Meridian has collaborated with stakeholders throughout the community to develop the PY2020 Action Plan in a manner that is consistent with the goals and strategies identified in the 2017-2021 Con Plan, which remains relevant to the current needs of the community. The City plans to continue improving the Program based on feedback from the community to ensure the intent of the Program continues to be met.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	MERIDIAN	Economic Development , Community Development Dept.

Table 1 – Responsible Agencies

Narrative (optional)

The Meridian CDBG Program is part of the City of Meridian’s Community Development Department and falls under the Economic Development Division. The Program works closely with Planning Division staff and Economic Development Division staff as well as other Departments in the City such as Public Works, Finance, and Parks and Recreation.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Meridian engages stakeholders via social media, email, and the City’s website. Community stakeholders include, but are not limited to: citizens of Meridian; current and past CDBG subrecipients; Idaho Housing and Finance Association (IHFA); Idaho Department of Health and Welfare (Divisions of Behavioral Health, Medicaid, and Public Health); Central District Health Department; Meridian Downtown Business Association; Region 4 Behavioral Health Board; Our Path Home Connect (coordinated entry); Region 4 Crisis Center; and Boise City/Ada County Continuum of Care (CoC). Agencies were identified for participation in the PY20 Meridian CDBG competitive application based on the needs and priorities identified during the 2017-2021 Con Plan planning process.

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

The City collaborated with the Ada County Housing Authority (ACHA), which is the local public housing authority, to assist the City in better understanding ACHA’s resources and needs. While there are no public housing units in Meridian, an estimated 10 percent of the housing authority’s total voucher supply are used within Meridian City limits.

ACHA and the City are both regularly involved with the CoC. The CoC meetings provide an opportunity to collaborate with regional and local housing providers (public, nonprofit, and private) and health and social service agencies (including private and non-profit mental health, emergency, and healthcare providers).

During PY18 the City and CoC connected with the Region 4 Behavioral Health Board (BHB), a government entity established by the State of Idaho in coordination with Idaho Health and Welfare. The BHB advises the State Behavioral Health Authority and the State Planning Council of the needs in this region and is facilitated by Central District Health (CDH). This collaboration provides access to a large number of agencies and citizens with expertise in mental health services, substance use disorders, law enforcement, education, and healthcare. The CoC Program Manager and City staff continue to be involved with the BHB to identify ways to enhance coordination between ACHA and healthcare providers, mental health services, and other supportive service agencies.

CDH also provides information related to housing units in which children have been identified as being lead poisoned concerning lead-based paint hazards, but since the majority of houses in Meridian were built after 1980 this has not been a concern.

Additionally, the City has developed a socioeconomic profile of Meridian that will identify gaps in service, likely partnerships, and needs of the community. The City is dedicated to extending further support to organizations that help meet the identified needs of the community. One need that is readily apparent is the need for housing affordability and rental support. Meridian is dedicated to increasing its inventory of housing that is affordable to ensure residents of all income levels can find housing in Meridian and to provide necessary supportive services. City staff will continue to stay engaged with the housing affordability and supportive service community so the City can better provide important tools and resources to affordable housing developers and supportive service providers.

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

The City participates in the CoC, locally branded as Our Path Home Connect, which includes staff members from neighboring communities along with healthcare, foster care and other youth programs, mental health providers, Ada County, law enforcement, nonprofit providers, state departments and school districts among other entities. In 2017 Our Path Home Connect launched coordinated entry which provides a single point of entry for households experiencing homelessness. Due to the data collected through coordinated entry, Our Path Home Connect has identified four strategic initiatives: end family homelessness, prevent first-time homelessness, expand supportive housing opportunities, and evolve the partnership. The involvement of foster care and other youth programs has encouraged the City to further evaluate the non-traditional homelessness experienced by youth and their families in Meridian.

The City has also updated internal policies to include a representative from the CoC in the CDBG Scoring Committee, which reviews applications for CDBG funding and recommends projects to be funded. This collaboration provides an opportunity to involve the CoC in the planning process and identify projects that will address the needs of those who are currently or at risk of homelessness.

Additionally, the City acts as a liaison between the Behavioral Health Board (BHB) and the CoC. The BHB is facilitated by Central District Health (CDH) and is comprised of 23 stakeholders, advocates, and professionals including the Idaho Department of Corrections for adults, Boise Police Department, Adult Mental Health staff that are responsible for discharging participants from state run psychiatric facilities, and Children's Mental Health staff that work with families in crisis. Involvement with this group allows the City to understand the broader needs of the community as related to behavioral health in general and specifically for those who are being discharged from institutional settings such as mental health facilities and corrections programs.

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

outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Meridian does not receive ESG funds; the state is the only recipient. Allocation of ESG is discussed at the CoC meetings, which Meridian staff attend. The City leverages the CoC's strategy for use of ESG funds by funding homeless prevention activities. The City does not have any emergency shelters and the RRH program serves countywide. The City continues its work with the Executive and Data and Performance Management Committees of the CoC to provide feedback on changes to the HMIS and data management process of the CoC.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Boise City/Ada County Continuum of Care
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Other government - Local Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The CoC was consulted as part of the 2017 Consolidated Planning efforts as well as during the current action planning efforts. Members of this group represent all of the agency/group/organization types listed above and assists the City in understanding the needs of the community as it relates to housing, homelessness, and fair housing. This consultation was effective in helping the City develop funding recommendations to address homelessness, homelessness prevention, and fair housing activities.</p>
2	<p>Agency/Group/Organization</p>	<p>Boise City/Ada County Housing Authority (BCACHA)</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing PHA Services - Housing Regional organization</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Market Analysis</p>

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	ACHA was contacted by the City to discuss the viability of its homebuyer assistance program in the midst of a difficult housing market. These discussions helped the City develop funding recommendation for continuing to provide CDBG dollars to ACHA for down payment assistance. This consultation also led to a discussion about housing development and policies that may change how the City interacts and funds these efforts in the future.
3	Agency/Group/Organization	West Ada School District No.2
	Agency/Group/Organization Type	Services-homeless Services-Health Services-Education Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City discussed the needs of homeless and unaccompanied youth in Meridian's public education system with the West Ada School District. Conversations led to the City's understanding of the number of unaccompanied youth in the school system with relatively limited resources and services available to these students and their families. The City identified gaps in services and will continue to work with the West Ada School District to develop a plan to fill those gaps.
4	Agency/Group/Organization	CATCH, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City meets often with CATCH to discuss the state of homelessness in Meridian. CATCH currently houses the coordinated entry efforts of the County and is tracking data related to Meridian's homeless population. These consultations clarify the need for certain support in Meridian and helping to develop a short- and long-term strategy to meet the needs of those experiencing homelessness in Meridian and across the County.
5	Agency/Group/Organization	City of Meridian
	Agency/Group/Organization Type	Other government - Local Planning organization Civic Leaders Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City regularly consults with the Mayor's Office, Department of Community Development, Planning Division, Economic Development officials, Finance Department, Public Works Department, and law enforcement officials to explore and operationalize the needs of community members in Meridian. Much of the conversation during the consultations surrounding the Action Plan deals with housing needs, wage growth, vacancy and affordability rates of housing, identifying households and areas that may be affected by lead-based paint requirements, and work to address poverty in the community. Many of these conversations are still in their preliminary stage and have not directly created outcomes or improved coordination, but work continues to plan and strategize to develop 1) incentives for affordable housing development; 2) partnerships to address service gaps in Meridian; 3) a clear plan/strategy to increase workforce housing developments; 4) a new City Comprehensive Plan that better-addresses and plans for the needs of LMI residents, including those experiencing homelessness; and 5) a socioeconomic profile of the City. All of these will offer insight, strategy, and structure to the City's community development efforts in the coming years.</p>
6	<p>Agency/Group/Organization</p>	<p>THE JESSE TREE OF IDAHO, INC.</p>
	<p>Agency/Group/Organization Type</p>	<p>Services - Housing Services-homeless</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Non-Homeless Special Needs</p>
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Jesse Tree was consulted to discuss the possibility to expand their emergency rental assistance program in Meridian. They provided insights and clarity into the need for their program due to continually rising rents across the City. This consultation contributed to an expansion of CDBG funding that will be given to this organization for homelessness prevention services.</p>

7	Agency/Group/Organization	UNITED WAY OF TREASURE VALLEY
	Agency/Group/Organization Type	Planning organization Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The United Way was consulted in efforts to create a Socioeconomic Profile of Meridian in an effort to better understand the housing, transportation, health, food, financial, and education needs of Meridian's residents. This partnership is ongoing and will likely result in funding provided to the City by this organization to conduct research and create plans to understand and meet these needs.
8	Agency/Group/Organization	City of Boise
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Administrative
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City regularly consults with the City of Boise to ensure that funding recommendations, administrative practices, and other activities are compliant with federal regulations. The coordination also reflects a shared goal to ensure that all activities undertaken with CDBG funds work to meet regional needs as well as local needs.

9	Agency/Group/Organization	Neighborworks Boise
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City worked with NeighborWorks Boise to discuss the viability of a homeowner rehabilitation program in Meridian.
10	Agency/Group/Organization	Idaho Fair Housing Forum
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City meets with this group to consult on how to advance the fair housing work of the City and region. These consultations have brought forth fair housing trainings and conferences educating over 1000 people about fair housing law and practice. These meetings also inform how the City will implement its strategies to affirmatively further fair housing.

11	Agency/Group/Organization	Neighbors United Collaborative
	Agency/Group/Organization Type	Services - Housing Services-Health Services-Education Services-Employment Service-Fair Housing Services - Refugees
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City regularly consults with this group to understand how to address the needs of LMI refugees in Meridian. Much of the discussion leading up to the development of this Annual Action Plan has been around fair housing and language access services in the community. The City is working with this and other groups to develop resources and materials that can better educate about fair housing best practices while providing refugees and others facing housing discrimination support to overcome negative situations.
12	Agency/Group/Organization	Idaho Apartment Association
	Agency/Group/Organization Type	Services - Housing Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults, as needed, with this organization to get the private-sector perspective on micro and macro issues in the world of housing and fair housing. These consultations have often informed the conversations and decisions taken to and made by Neighbors United, Idaho Fair Housing Forum, and the CoC's Fair Housing Subcommittee.

13	Agency/Group/Organization	Region 4 Behavioral Health Board
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-Health Services-Education Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Other government - Local Regional organization Planning organization Business Leaders Civic Leaders
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The BHB was consulted as part of the current action planning efforts. Members of this group represent all of the agency/group/organization types listed above and assists the City in understanding the needs of the community as it relates to people with mental health and substance use disorders. This consultation was effective in helping the City develop funding recommendations to address economic stability for people with disabilities.
14	Agency/Group/Organization	Unity Through Inclusion

	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with this group to identify the needs of diverse populations in Meridian.
15	Agency/Group/Organization	Central District Health
	Agency/Group/Organization Type	Services-Health Services-Education Services - Victims Health Agency Publicly Funded Institution/System of Care Other government - Local Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Lead-based Paint Strategy

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consulted with CDH regarding strategies related to lead-based paint, transportation options in Meridian, and health disparities related to Meridian's LMI residents.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

Not applicable; every agency identified was offered an opportunity to participate in the development of the plan. While no agencies were left out, the City does not have a citizen’s advisory group to consult with. Citizen’s are requested to participate in public hearings and public presentations via social media and local newspapers, but there is no formal group. To gather citizen input specific to the slum and blighted area where CDBG funds are to be used, the City contacted residents who live in that area directly while the Redevelopment Plan was being developed and again when the Redevelopment Plan was being approved. Residents were also informed of the potential projects in this area during the development of the plan as well as the CDBG process of selecting projects annually. Invitations for public presentations related to the Action Plan and Project Applications were then sent out by email and social media.

In PY20, the City would like to improve its coordination with housing developers, particularly those developers who specialize in the development of workforce and affordable housing. Increased efforts were not made this year to reach out to these groups as the City is still working to develop internal strategies and plans about how it wants to address the housing affordability needs in the community and how to engage developers in that process. The City is also developing a new Comprehensive Plan that includes consultants doing consultations in the coming months. The decision was made to couple the needed consultation efforts of these Community Development activities with comprehensive planning consultation activities.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Idaho Housing and Finance Association, Ada County, City of Boise	The City maintains goals of improving economic outcomes of low income residents, providing emergency rental assistance, and improving housing options and social and supportive services for people including but not limited to people with special needs and individuals/families leaving domestic violence situations. These will contribute to the CoC objective of Ending Chronic Homelessness by preventing Meridian residents from falling into homelessness.
State of Idaho Analysis of Impediments	Idaho Housing and Finance Association; Idaho Department of Commerce	The fair housing strategies established for Meridian considered opportunities to collaborate with the State. The City regularly involves representatives from IHFA, City of Boise, City of Nampa, City of Caldwell, and Idaho Department of Commerce in the planning, funding, and implementation efforts of fair housing activities in the region and state.
Meridian Comprehensive Plan	Meridian Planning Division	The City Comprehensive Plan was consulted during preparation of the Consolidated Plan to ensure goals were consistent with the needs and desires of the community. Land use and zoning regulations were reviewed to assess barriers to housing choice.
ACHA Policies and Procedures	ACHA	The housing authority policies and procedures were reviewed to ensure they support housing choice and address the greatest needs of low income residents.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City is working with various stakeholders throughout the region to develop a comprehensive Action Plan, which will improve collaboration between entities, thereby reducing the duplication of efforts and using limited time and resources more effectively.

AP-12 Participation – 91.105, 91.200(c)

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

In 2017, the City completed an extensive citizen participation procedure to gain public guidance and information for the 2017-2021 Consolidated Plan. The findings of those efforts have informed the priorities, needs, and goals entirely. During the consolidated planning process, the feedback received from public surveys, stakeholder interviews, and other public feedback created the framework for which all CDBG goals and action plans will be based on. The City has the goal to use the public feedback from the Con Plan to inform funding decisions proposed in this and subsequent annual action plans.

In addition to the consolidated plan citizen participation processes, the City has undergone all federally required citizen participation requirements for this action plan. The City encouraged participation in developing and implementing the plan with not only low- and moderate-income persons but also with local and regional institutions, the Continuum of Care, businesses, developers, non-profits, community members, and faith based organizations. These include a minimum 30-day public comment period with a formal public hearing during that comment period. The City published legal notices in two local newspapers (Idaho Statesman and Meridian Press) and posted the PY20 Draft Action Plan on the City's website. Staff worked with the City's Communication Department to share information regarding the recommended projects and priorities for the upcoming year as well as the public comment period and public hearing. The Communication Department shares information via Facebook, Twitter, Instagram, LinkedIn, Nextdoor, and a City-wide distribution list. CDBG staff also maintains a distribution list specific to those who have shown interest in CDBG and the same information was sent to that distribution list as well as several partner organizations distribution lists. All comments received were reviewed, acknowledged, and included as an attachment to this plan.

The CDBG Public Service Scoring Committee was responsible for scoring, ranking, and providing funding recommendations for public service applications submitted. This Committee consisted of the following representatives:

- Four (4) Meridian residents;
- One (1) Finance Department staff;
- One (1) City Council member;
- One (1) CoC member;
- Two (2) Community Development Department staff; and

- One (1) Mayor’s Office staff.

This multi-perspective approach to project funding recommendations allows the City to incorporate the viewpoints of a wide representation of interests throughout the community to better embody the needs of Meridian. The largest representation was intentionally Meridian residents to encourage the public to more actively participate in determining the path of the Program in the coming year.

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	A public hearing was held at the City Council meeting on July 21.	n/a	n/a	
2	Public Meeting	Non-targeted/broad community	Public meetings were held during the City Council meetings on July 7 and 21. Meetings included presentations that outlined the applications received, funding recommendations, specific projects, and discussion by Council on the proposed projects.	n/a	n/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Newspaper Ad	Non-targeted/broad community	Legal notices were published in the Idaho Statesman and Meridian Press Tribune newspapers on June 19 that described the public presentations, comment period, and hearing regarding this plan.	n/a	n/a	
4	Internet Outreach	Non-targeted/broad community	Notices of the public comment period and public hearing were sent out using the City's social media accounts (Facebook, Twitter, Instagram, LinkedIn, Nextdoor).	n/a	n/a	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
5	Email	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notices of the public comment period and public hearing were sent out using multiple distribution lists including that of the Meridian CDBG Program, Mayor's Office, Behavioral Health Board, CoC and ACHA.	Three comments were submitted in support of the CDBG Program and PY20 Action Plan.	n/a	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City of Meridian anticipates receiving \$489,753 in CDBG funds for PY20 and will leverage staff time to complete projects implemented by the City. The majority of CDBG projects are implemented by subrecipients and the City expects funds to be leveraged with CDBG funds to improve the outcome of the project.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	489,753	0	0	489,753	400,000	The City has allocated all prior year funding and expects to receive around \$400,000 during the remaining year of the Con Plan.

Table 5 - Expected Resources – Priority Table

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

The City of Meridian does not receive funding for HUD programs other than CDBG and there are no additional state or federal funds available to leverage for program activities. The City does use local funds to leverage staff time to implement all CDBG activities.

The projects identified below anticipates leveraging the following resources:

- ACHA – local and federal funds for staff time to administer the homeownership program and to assist with ongoing mortgages for those who qualify;
- Boys & Girls Club – private funds to administer the scholarship program and provide additional scholarships to those who are unable to access CDBG funding;
- City of Meridian – local funds to pay staff salaries;
- Jesse Tree of Idaho –private funds will be used to administer the program and provide additional assistance to those who are unable to access CDBG funding.

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

There are currently no publically owned lands within Meridian that have been identified to specifically address needs of the Con Plan or the Action Plan.

Discussion

The City and its subrecipients will work to leverage funding and in-kind resources to help maximize the usage of CDBG funding.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Accessibility	2017	2021	Non-Homeless Special Needs		Better Accessibility in Meridian Improve Accessibility in Meridian	CDBG: \$255,488	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7160 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Enhance Homeownership Opportunities	2017	2021	Affordable Housing		Homeownership Opportunities: 80-120 Percent of AMI Improved Housing Options and Supportive Services Improved Weatherization of Housing Stock Better Accessibility in Meridian Down Payment Assistance Opportunities Housing Rehabilitation Opportunities	CDBG: \$107,000	Homeowner Housing Rehabilitated: 8 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted
3	Provide Social Services	2017	2021	Non-Homeless Special Needs Low income services		Improvements in Economic Stability Service Programs - Low Income and Special Needs	CDBG: \$45,000	Public service activities other than Low/Moderate Income Housing Benefit: 130 Persons Assisted
4	Administration and Fair Housing Activities	2017	2021	Admin			CDBG: 82,265	Other: 0 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve Accessibility
	Goal Description	The City will coordinate with City and local stakeholders to implement projects that will improve accessibility in LMI areas.
2	Goal Name	Enhance Homeownership Opportunities
	Goal Description	The City will provide funding to support LMI households obtain or maintain housing that is affordable to them.
3	Goal Name	Provide Social Services
	Goal Description	The City will address identified needs by providing local agencies with funding to provide necessary public services to LMI residents.
4	Goal Name	Administration and Fair Housing Activities
	Goal Description	The City will administer the Program, including collaboration with local entities to educate residents and landlords on fair housing rights and responsibilities.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City has allocated CDBG funds to projects that meet the priority needs and goals identified in the 2017-2021 Con Plan.

Projects

#	Project Name
1	Public Services
2	Housing
3	Accessibility
4	Administration
5	Fair Housing

Table 7 - Project Information

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

Projects were prioritized based on the needs identified in the 2017-2021 Con Plan, needs expressed in the PY20 CDBG competitive application process, and the experiences of the CDBG Scoring Committee. A common obstacle for public service projects is the lack of available funding to provide the necessary level of services. To address this, subrecipients will leverage other funding sources and utilize screening criteria to provide services to those with the highest level of need first.

The main obstacle for housing projects in Meridian is related to the soaring housing market in Meridian and lack of affordable homes. There are often bidding wars for the few affordable units that come onto the market. To address this, down payment assistance subrecipients have developed close working relationships with community stakeholders to identify additional sources of assistance that will make the homebuyers more competitive in this market. Additionally, the City is working on a new activity to provide owner-occupied rehabilitation for those who already own homes they can afford in order to keep them stably housed. A potential obstacle to addressing the underserved needs is making the community aware of this program. The City intends to assist the subrecipient on outreach for this program.

The accessibility projects have the potential obstacle of rising construction costs, which is related to the soaring housing market. Oftentimes it is difficult to find a contractor to complete smaller construction

projects because there is such a demand for large construction projects right now.

No obstacles have been identified for Administration and Fair Housing.

AP-38 Project Summary

Project Summary Information

1	Project Name	Public Services
	Target Area	
	Goals Supported	Provide Social Services
	Needs Addressed	Improvements in Economic Stability Service Programs - Low Income and Special Needs
	Funding	CDBG: \$45,000
	Description	Public service projects will provide support and stabilization to Meridian residents with a low to moderate income.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	80 low to moderate income families
	Location Description	Services will be offered in the community and at provider offices and will benefit households throughout Meridian.
Planned Activities	Public service activities that will support and stabilize Meridian households with a low to moderate income. Priority will be given to projects for services related to homelessness prevention and stabilization, food security, and childcare.	
2	Project Name	Housing
	Target Area	
	Goals Supported	Enhance Homeownership Opportunities
	Needs Addressed	Homeownership Opportunities: 80-120 Percent of AMI Improved Housing Options and Supportive Services Improved Weatherization of Housing Stock Better Accessibility in Meridian Down Payment Assistance Opportunities Housing Rehabilitation Opportunities
	Funding	CDBG: \$107,000
	Description	Housing projects will support low to moderate income households to obtain or maintain housing affordability in Meridian.
	Target Date	9/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	11 low to moderate income families
	Location Description	Services will be provided at subrecipient offices and will benefit households throughout Meridian.
	Planned Activities	Housing activities that will provide affordable housing options in Meridian.
3	Project Name	Accessibility
	Target Area	
	Goals Supported	Improve Accessibility
	Needs Addressed	Better Accessibility in Meridian Improve Accessibility in Meridian
	Funding	CDBG: \$255,488
	Description	Accessibility projects will increase the safety and usability of public facilities for an estimated 2,000 households in Meridian's LMI areas.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	2,387 low to moderate income families
	Location Description	LMI Areas in Meridian
	Planned Activities	Projects that will improve accessibility to public facilities with a priority on sidewalk improvements.
4	Project Name	Administration
	Target Area	
	Goals Supported	Administration and Fair Housing Activities
	Needs Addressed	
	Funding	CDBG: \$72,265
	Description	This project will have activities that relate to the administrative, planning, and technical assistance for the CDBG program during PY20.

	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	Administration office is located in Meridian City Hall at 33 E. Broadway Ave. suite 102.
	Planned Activities	Administration and Planning
5	Project Name	Fair Housing
	Target Area	
	Goals Supported	Administration and Fair Housing Activities
	Needs Addressed	
	Funding	CDBG: \$10,000
	Description	This project will carry out activities that relate to fair housing. At a minimum, CDBG funds will be used to implement a Fair Housing Campaign in April. Other opportunities to promote fair housing activities will be evaluated as they arise.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	300 low to moderate income families
	Location Description	The Fair Housing Campaign will be promoted via television, radio, and social media.
	Planned Activities	Fair Housing Activities

AP-50 Geographic Distribution – 91.220(f)

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

The City of Meridian’s basis for allocating public service and housing projects is geographically delineated within its municipal boundaries. Funding is determined by meeting national objectives, qualifying eligible activities, and through a competitive application process. The City does not specify target areas by census tract or block group. The use of CDBG funding is not pre-determined on areas of

low- and moderate- income concentration or racial characteristics. Service agencies providing CDBG funded services are primarily located in Boise; however, low- and moderate-income clients served reside in Meridian.

Area benefit activities are all located in at least one of the four (4) census tracts that fall within Meridian’s LMI area, which include census tracts: 0103.21; 0103.22; 0103.31; and 0103.35.

Geographic Distribution

Target Area	Percentage of Funds
n/a	n/a

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Meridian has not identified a target area.

Discussion

The City allocates funds to assist low- to moderate-income (LMI) Meridian residents without targeting or prioritizing specific geographic locations outside of the LMI area for area benefit projects per HUD guidelines.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Meridian dedicates funding to providing LMI Meridian residents with affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	11
Special-Needs	0
Total	11

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

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

One Year Goals for the Number of Households Supported Through	
Rehab of Existing Units	8
Acquisition of Existing Units	3
Total	11

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

For acquisition, subrecipient(s) will utilize funding to subsidize mortgage principal amounts, assist with closing costs, and provide up to 50% of the required down payment. Subrecipients will ensure the Section 215 definition of affordable housing is met by requiring participants to: qualify as a first-time homebuyer; purchase a home that will be their principal residence; and the homebuyer's annual household income must be at or below 80% of Area Median Income. Additionally, participants receive housing counseling and works with subrecipient(s) to find housing where the cost of the housing is reasonable and affordable to the homebuyer, so the housing does not exceed 95 percent of the median purchase price for the area.

For owner-occupied rehabilitation, subrecipient(s) will utilize funding to assist homeowners with emergency repairs, accessibility, weatherization, and projects that will allow homeowners to age in place.

AP-60 Public Housing – 91.220(h)

Introduction

The City of Meridian is served by the Ada County Housing Authority (ACHA), who administers the Homeownership Voucher Program, Housing Choice Voucher, Mainstream Voucher, as well as managing the Family Self Sufficiency Program.

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

As part of the City’s overall Comprehensive Plan, Meridian has identified a goal of offering a diversity of housing types for all economic levels throughout the City. To accomplish this goal, Meridian encourages quality housing projects for all economic levels throughout the city. The City supports a variety of residential categories (low-, medium-, medium-high and high-density single family, multi-family, townhouses, duplexes, apartments, condominiums, etc.) for the purpose of providing the City with a range of opportunities to provide housing that is affordable to all. In spite of these efforts, ACHA has

identified a lack of affordable units as one of the barriers to eligible renters and potential homeowners.

Meridian is one of the towns within Ada County, which ACHA serves. ACHA has a 72% success rate, whereas the national average is typically a 65-69% success rate. This leaves an estimated 28% of households receiving Housing Choice Vouchers (HCV) in Ada County unable to identify housing within 120 days, requiring them to relinquish the voucher and return to the waiting list. There are many reasons a participant may not be able to identify a housing unit including:

- Landlords feel there is too much “red tape” associated with the vouchers;
- Rents in this community are often above the fair market rents HUD allows;
- Misperception that voucher holders make bad tenants;
- Poor credit/rental history or criminal background may make some ineligible; or
- Lack of units that will accommodate larger families.

The City will continue to collaborate with ACHA, the CoC, and other partners during PY20 to move forward. The City is in the process of updating its Strategic Plan, which will include tasks related to housing affordability.

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

ACHA encourages public housing residents to participate in homeownership by:

- Referring families interested in homeownership to first-time homebuyer workshops covering the following topics: benefits of and preparation for homeownership, credit analysis, FICO scoring methodology, mortgage types and requirements, private mortgage insurance, loan-to-value ratio, down payment assistance programs, escrow and title process, property taxes, home maintenance, and homeowner responsibilities.
- Providing one-on-one meetings with a Homeownership Coordinator to determine short- and long-term goals in obtaining homeownership and to make a plan to reduce any barriers that need to be addressed.
- Collaborating with nonprofit partner agencies, lenders, and realtors in the delivery of counseling services for low- to moderate-income first-time homebuyers in the FSS/HCV programs. Expanding partnerships with community organizations, lending institutions, and real estate professionals.
- Actively marketing the Homeownership Assistance program to existing voucher holders through quarterly newsletters and attending the annual recertification meetings for voucher holders to explain the programs.

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

provided or other assistance

ACHA is not a troubled PHA.

Discussion

The City is committed to helping LMI households access necessary services and homeownership as desired through a variety of methods.

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

Introduction

The City coordinates with the Boise City/Ada County Continuum of Care (CoC) and the Region 4 Behavioral Health Board (BHB) to identify the strategies to address needs of those who are at risk of or currently experiencing homelessness.

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 of Meridian has been a member of the CoC for the last five years to better understand and coordinate the needs that Meridian residents who are currently or at risk of experiencing homelessness face and how to better serve them. In addition, City representatives are frequently involved in public discussions, presentations, and meetings with citizens, other governmental officials, and local service providers including West Ada School District, Jesse Tree, and CATCH to provide support, understanding, and outreach to those who are experiencing homelessness in Meridian.

In previous years, the City worked with the CoC to add data points to the CoC’s Homeless Management Information System (HMIS) to enable the City to determine how many Meridian residents are experiencing homelessness and the reasons for their housing crisis. This data and information was evaluated while developing the PY20 Action Plan to better inform strategies and partnerships for the City to implement. The City is committed to serving the individual needs of Meridian’s homeless population as identified by the CoC and local organizations.

The City has also worked with the CoC to conduct the annual Point-in-Time Count, which helps determine the number of people who are experiencing homelessness on a given day. This information allows the City to understand the level of homelessness in Meridian and to develop a program that better serves those in need. The City will continue to assist with this process in upcoming years.

The City intends to continue to use its partners to identify, understand, and support those experiencing homelessness (especially persons experiencing unsheltered homelessness) or at risk of homelessness with special needs in Meridian.

Addressing the emergency shelter and transitional housing needs of homeless persons

While there are emergency shelter and transitional housing facilities located in other nearby cities in the Treasure Valley, none of these facilities are located within City of Meridian. The City has prioritized funding homelessness prevention to mitigate the need for these services, but also works closely with the CoC to assist Meridian residents who are in need of emergency shelter. The City encourages agencies who provide these services to apply for CDBG funding, but there were no applications during PY20 for projects directly related to emergency shelters or transitional housing projects. However, all services to be funded are available to those who qualify.

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

The City will provide funding to ACHA to assist with down payment and closing cost assistance to Meridian residents with a low- and moderate-income . In addition, Meridian's work with Jesse Tree has helped provide rental and case management services aimed at preventing and resolving needs for those currently experiencing homelessness or at risk of homelessness in Meridian.

The partnerships that the City has with local committees, organizations, and networks in evaluating, understanding, and addressing the many needs of Meridian residents experiencing homelessness include Meridian Police Department, Ada County Sheriff's Office, City of Boise, City of Nampa, City of Caldwell, Women's and Children's Alliance, Jesse Tree, Boys & Girls Clubs of Ada County, West Ada School District, CATCH, Ada County Housing Authority, Local HUD office, CoC, Meridian Food Bank, United Way, NeighborWorks Boise, IHFA, Terry Riley, El-Ada Community Action, Our Path Home Connect, and many others. These partnerships are extensive and ongoing in order to help address and prevent homelessness in Meridian.

These efforts, particularly coordination and participation with CATCH and the CoC, are designed to assist local service providers in helping persons experiencing homelessness make the transition to permanent housing and independent living while shortening the time individuals and families experience

homelessness.

In addition, the City's relationships with ACHA, CATCH, and Jesse Tree are aimed to develop activities through the Program that facilitate access for individuals and families experiencing homelessness to affordable housing units while also preventing individuals and families from becoming homeless.

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 City is involved in the CoC, which is comprised of representation from ACHA, Health and Welfare, mental health service providers and other service agencies, including law enforcement and correctional agencies. The CoC coordinates, collects data, reviews data, and prioritizes strategies based on data and input from providers. Coordinated entry serves all communities within Ada County and case conferencing is conducted weekly.

The City is also involved in the Behavioral Health Board (BHB), which focuses on mental health and substance use disorders. The BHB is a government entity established by the Idaho legislature in 2014 to advise Idaho's behavioral health authority, identify gaps, and promote improvements to the delivery of integrated services for behavioral health in Idaho. The Board promotes and supports prevention, intervention, recovery and resiliency for individuals and families in need. It is composed of 23 stakeholders, advocates, and professionals across the continuum of care. Involvement with this group allows the City to understand the broader needs of the community as related to behavioral health in general and specifically for those who are being discharged from institutional settings such as mental health facilities and corrections programs.

During PY20 the City will also provide funding to Jesse Tree to keep families, individuals, and children who are at risk of eviction stably housed. Meridian partners with other organizations, such as the West Ada School District, to assess needs and provide services for those at risk of becoming homeless.

Discussion

Much of the work funded through the Program is directed at housing stability for Meridian's LMI residents. In addition to the services previously mentioned, the City is focusing on public transportation for seniors, ADA compliance improvements to public facilities, and public facility improvements such as sidewalk and streetlight improvements in LMI areas to meet the needs of those in the community who

may or may not be experiencing homelessness.

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

Introduction:

Section V of the Consolidated Plan and Fair Housing Assessment, a supplement to the City’s 2017-2021 Consolidated Plan which can be found in the Grantee Unique Appendices, analyzes public and private barriers to housing choice in Meridian. Stakeholders were also interviewed about housing barriers. Barriers associated with tax policies, land use controls and zoning, building codes, fees and charges, growth limits, and policies affecting the return on residential investment were not identified as barriers. On the contrary, the review found a favorable environment for development and a migration toward more diverse housing types.

As such, the actions summarized below do NOT address the negative effects of public policies that serve as barriers to affordable housing (policies, procedures, processes). Instead, they focus on actions that address other types of identified barriers.

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

The City has expressed a commitment to creating more diverse housing types through its redevelopment plan for downtown. The Destination Downtown plan states that creating diverse housing opportunities for different housing needs and life-cycles in downtown Meridian is important to support new businesses and activity. A healthy housing mix will also help to draw people downtown and ensure 24-7 activity. Housing created or redeveloped as part of the downtown plan is expected to include apartments, townhomes, condominiums, duplexes, and single-family homes. The City helped facilitate the recent RFP for a large portion of the publicly-owned properties in downtown Meridian with a priority given to proposals that focused on developing mixed use and high-density housing. The project that was awarded, Downtown Lofts, will bring several affordable units to downtown Meridian including six (6) that will be dedicated to CATCH participants. This project is expected to be completed in early 2021.

In 2017, to evaluate potential fair housing concerns within the City’s zoning code, the City had BBC Consulting utilize a “Review of Public Policies and Practices (Zoning and Planning Codes)” form recently circulated by the Los Angeles fair housing office of HUD. The research did not reveal any negative effects of public policies that serve as barriers to affordable housing. This includes land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies

affecting returns on residential investment.

In addition, over the next few program years, the City intends to undergo a review of potential policy and code changes that will incentivize the future development of multi-family and affordable housing units in Meridian.

Discussion:

Please see the Grantee Unique Appendices attached to the City's 2017-2021 Consolidated Plan for details (Section V, pages 9 through 11).

AP-85 Other Actions – 91.220(k)

Introduction:

This section discusses the Other Actions the City will take to address the needs of low-income residents.

Actions planned to address obstacles to meeting underserved needs

The City will continue to engage in conversations with neighboring communities and service providers to identify and address underserved needs, maintain affordable housing, and reduce the number of families living in poverty.

During PY20, the City has allocated funding to provide, housing stability for those at risk of homelessness and extended care programs that offer youth a positive place to go. Additionally, the Economic Development Administrator works closely with the CDBG program in an effort to better align the needs of our residents.

The City will increase relationships with private providers, developers, and social services providers to reduce the obstacles for Meridian residents to achieve decent housing, a suitable living environment, and expanded economic opportunities.

Actions planned to foster and maintain affordable housing

The City intends to partner with local service providers that will assist in fostering and maintaining affordable housing. Projects funded during PY20 will provide: emergency assistance to families who are at risk of eviction and homelessness; assistance for homeowners to make necessary improvements to maintain their current housing; scholarships for children to participate in extended care programs so their caregivers can work; and down payment assistance to help renter households become homeowners. Additionally, the City will be working with service providers that focus on providing stability to those with mental health and/or substance use disorders to allow them to gain or maintain

affordable housing with access to care coordination.

The City will also explore additional partnerships—including partnerships with mission-driven and private developers—to bring more workforce housing into downtown and underutilized land parcels. The City also collaborates with the Economic Development Administrator to explore the development of workforce housing and opportunities for residents to increase their income in an effort to foster and maintain affordable housing.

Actions planned to reduce lead-based paint hazards

Over the course of the upcoming program year, the City will provide information regarding lead-based paint hazards to educate the public and continue to gauge the prevalence of lead paint contamination within the City. There is a wealth of information already available from HUD, the State, neighboring communities, and various organizations that staff will gather and make available at City Hall, on the City's website, and at other locations throughout the community as needed. Additionally, City staff has reached out to CDH staff to ensure they have a contact person if lead-based paint hazards arise.

Actions planned to reduce the number of poverty-level families

The City will fund projects to assist poverty-level individuals and families access services that provide a support system and allow them to focus on the steps they need to take to improve their living situation. Projects include programs that provide emergency assistance to families who are at risk of homelessness and housing cost assistance for residents unable to cover the full costs of home purchases. The City's Strategic Plan also intends to address poverty-based issues through the expansion of necessary public services and the expansion of quality employment opportunities for the jurisdiction's LMI population.

As part of its Strategic Plan, the City is working on an in-depth socioeconomic profile of the City to help identify the needs of community members as it pertains to housing, finances, food, education, healthcare, and transportation. Completing this research will allow the City to better understand the factors that are contributing to residents who are facing poverty in Meridian, as well as help define solutions that could help mitigate those factors. The City's hope is that this research will provide long-term insights and strategies to reduce the number of poverty-level families in Meridian.

Actions planned to develop institutional structure

In recent years the City made the CDBG Administrator position a full-time position and changed the position title to Community Development Program Coordinator. This position is now funded out of the City's general fund. This institutional change is designed to provide more time to effectively manage the CDBG program and provide flexibility for the position to expand efforts into economic and other areas

that can help meet the community development needs of the City. Staff will continue to work to attain relevant and appropriate professional development trainings during the program year to learn and address current and future institutional problems. Discussions will continue about the expansion and opportunities to add new program staff to assist in this community development work.

The City has been involved in the institutional restructuring of the CoC as well as the implementation of new HMIS and Coordinated Entry standards for service providers in the County. These activities have dramatically altered the institutional framework of housing and other service providers in the region and has improved the efficiency and transparency of the coordinated work being done to address these needs. The City hopes to identify new institutional structures that can be developed, reformed or changed to better support the needs of those most at risk in the region (e.g. transitional and emergency housing networks).

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

City staff will be working with the CoC to identify ways to enhance coordination between public and private housing and social service agencies. As in many communities, there is not enough funding to provide the level of services we'd like so the CoC plans to identify a way of coordinating services that are available and reducing duplication of services for a more effective use of funding. Multiple methods will be explored including phone apps and enhancing services that are already available.

The City's partnership and funding relationship with local housing service organizations including NeighborWorks Boise, Jesse Tree, and Ada County Housing Authority will continue to expand in this program year. In addition, coordination with other organizations like CATCH, Boise Rescue Mission, Interfaith Sanctuary, Terry Reilly, El-Ada Community Action, Jannus, Idaho Office for Refugees, Agency for New Americans, Women's and Children's Alliance, and all members associated with the local CoC (including private housing developers) will continue to be built upon to improve networks, coordination, and problem solving in the jurisdiction. Meridian's participation in the local CoC, housing and homelessness roundtables, and other regional coordination efforts outlines the City's continued action plan for enhancing the networking and coordination between public and private housing and social service agencies.

Discussion:

The City intends to fund multiple projects that will improve access to affordable housing and suitable living environments for Meridian residents. Staff will be working with subrecipients to identify barriers within their programs and find ways to address them to provide more effective services. Staff will also

identify ways to improve and expand Meridian’s CDBG Program for future years.

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

The City's certification period includes program years 2018, 2019, and 2020. Outside of admin and fair housing, the City will allocate all funding for PY20 to LMI projects. The City commits to meet the 70% LMI benefit requirement of the federal CDBG program over the span of that three-year certification period.

Attachments

Citizen Participation Comments

Date	Method of Submission	Contributor	Comment	City Response
6/23/2020	Email	Michael Shepard	<p>I currently run the Acquisition and Rehab program for NeighborWorks Boise. We have done several full Acq Rehab projects in the City. I believe this new Owner Occupied Rehab Program will help low to moderate income families living in the City of Meridian continue to live in safe secure housing. We will be assisting the most vulnerable populations. The rehab completed will help the existing housing stock more energy efficient and in good repair. Many of these individuals do not have the financial resources to make the improvements to keep their homes in good repair.</p> <p>I am in full support of this program.</p>	The City appreciates the support.
6/25/2020	Email	Ali Rabe	<p>CDBG is an excellent resource for nonprofits working to prevent eviction and homelessness in the community. As the Executive Director of Jesse Tree, a nonprofit dedicated to keeping people in their homes, CDBG is a pool of funding our case managers can access to serve Meridian residents. Our case managers work closely with clients through a budgeting process and housing stability planning, and after supporting them to create a plan to work towards financial independence and self-sufficiency we utilize Meridian CDBG funds to catch people up with rent that's owed. As the Executive Director, having access to this funding alleviates the need for fundraising activities and allows us to use our other privately fundraised sources for other crucial programs and operations.</p>	The City appreciates the support.
6/25/2020	Email	Jessica Peters	<p>I support this Action Plan and the CDBG Program in general. At a time when our city is growing so quickly and home prices and cost of living are rising so much, it's more important than ever that we continue to provide support for folks in the community who may not be able to keep up financially, for a variety of reasons. In addition, loss of work or income and/or healthcare costs due to covid-19 have increased the number of people who need assistance. I hope the city will continue to support this program to ensure that none of our community members fall through the cracks.</p>	The City appreciates the support.

Grantee Unique Appendices

Fair Housing Assessment

SECTION V. Public and Private Actions

This section examines public and private decisions that affect housing choice. It begins with an examination of the land use regulations and the policies and practices of the Boise City/ Ada County Housing Authority (BCACHA), the largest provider of publicly-supported housing in the region. It also analyzes mortgage loan decisions of the private sector. Other private sector actions are examined in the fair housing legal cases discussed in Section VI.

Public Housing Authority

The policies and procedures of the Boise City/ Ada County Housing Authority (BCACHA) were reviewed as part of the fair housing analysis, using the discussion topics recommended by HUD in the AFH template. The following discussion of BCACHA policies and procedures is based on in-depth interviews with management.

Interviews with BCACHA staff about policies and practices revealed there may be some fair housing concerns in regards to access to services and housing for persons with disabilities.

In sum, the BCACHA subscribes to the following procedures:

- Equal weight preferences for elderly, disabled and families with minor children. People who are timing out of transitional housing go to the top of the list, while out-of-state requests are last.
- Buy, rehab and sell affordable homes through BCACHA's \$500,000 self-funded program. The grant focuses on down payment and closing cost assistance.
- Comply with HUD's April 2016 guidance on criminal history by evaluating violent, drug convictions individually and conducting a three year look back (BCACHA was already in compliance before the recent change in criminal history policy).

BCACHA currently assists 1,800 very-low income households with Section 8 rental assistance in Ada County. At the time this report was prepared, BCACHA was not accepting any additional applications for the Section 8 Housing Choice Voucher (HCV) program. The waitlist for voucher assistance is anywhere between 6 to 24 months, depending on federal funding. BCACHA staff feel that the market is relatively accepting of Section 8 vouchers, but this varies by location.

The greatest challenges faced by the BCACHA are:

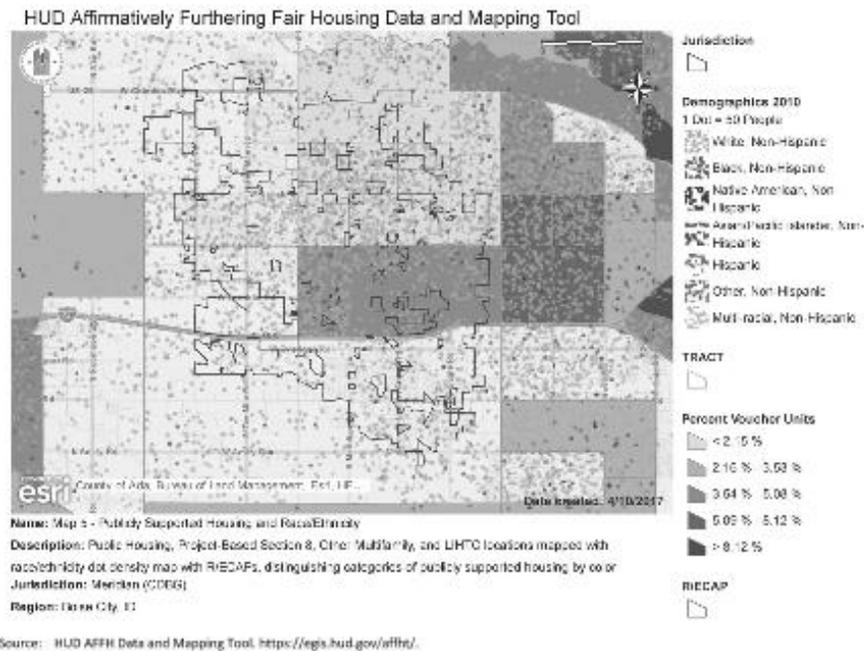
- Transportation barriers for accessing services. Although landlords are willing to take Section 8 in the area, the BCACHA has had most success with Boise landlords. Even when landlords take Section 8 in Meridian, most of the services are located in Boise and the lack of public transportation creates barriers.

- Physical accessibility in housing for person with disabilities.
- Lack of affordable housing and preservation of existing multifamily units, especially for seniors. The PHA's focus has been on rehabilitating homes and selling affordable units, rather than rental units. The biggest issues are push back from the community to prevent new affordable multi-family and difficulty in accessing LIHTC.

The geographic distribution of Housing Choice Voucher (HCV) holders is pictured in Figure V-1. Census tracts in eastern and southern Meridian either do not have available data or HCV don't exist. The area with the highest cluster of HCV holders is located in the central and west central census tracts of the City. As discussed in Section IV, this is an area of the City with relatively moderate opportunity.

In addition to providing HCVs, BCACHA offers a homeownership voucher through their Family Self Sufficiency (FSS) program. This program is available to residents currently participating in the HCV program. The Housing Authority's goal is to promote and support homeownership for families by payment assistance to help pay for the cost of homeownership and to provide additional assurance to mortgage lenders.

Figure V-1.
HUD AFFH Tool Jurisdiction Map of Meridian, Map 5, Publicly Supported Housing and Race/Ethnicity, 2010



Land Use Regulations and Policies

BBC reviewed the City of Meridian's zoning regulations, comprehensive plan and planning fees to assess potential fair housing concerns or opportunities resulting from the development process. This review did not identify any fair housing problems.

The City has recently expressed a commitment to creating more diverse housing types through its redevelopment plan for downtown. The plan states that creating diverse housing opportunities for different housing needs and life-cycles in downtown Meridian is important to support new businesses and activity. A healthy housing mix will also help to draw people downtown and ensure 24-7 activity. Housing created or redeveloped as part of the downtown plan is expected to include apartments, town homes, condominiums, duplexes, and single family homes.

Land use and zoning laws. To evaluate potential fair housing concerns within the City's zoning code, BBC utilized a "Review of Public Policies and Practices (Zoning and Planning Codes)" form recently circulated by the Los Angeles fair housing office of HUD. This section poses the questions from this checklist, along with responses about the City's code. The zoning code for the City of Meridian was updated in December 2016.

Does the code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? No. The City's code defines the term "family" as a person living alone or two or more persons related by blood or marriage; a group of not more than ten persons who need not be related by blood or marriage living together in a dwelling unit; or eight or fewer unrelated mentally and/or physically handicapped or elderly persons residing in a dwelling under staff supervision.

"Group home" is not defined in the City's code, but the clear definition of "family" applies to congregate or group living arrangements.

Zoning Regulation Impediment: Does the Code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? No. Although some jurisdictions do not define family to allow for flexibility, Meridian's definition provides a wide range of applications.

According to lawyer Brian Connolly, co-author of a recent American Bar Association book on group homes planning and regulations, some jurisdictions are removing definitions of family from local codes to avoid potential liability.¹ Instead, communities are using more flexible definitions that avoid distinctions based on the relation of the household members and instead focus on the "functional aspects of a family relationship."

Zoning Regulation Impediment: Is the Code definition of "disability" the same as the Fair Housing Act? The Zoning Code does not provide a definition of "disability," "disabled" or "handicap."

¹ *Group Homes: Strategies for Effective and Defensible Planning and Regulation*, Connolly, Brian J. and Dwight H. Merriam.

Practice Impediment: Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a "boarding or rooming house" or "hotel"? No. The City's code does not define "boarding or rooming house".

Practice Impediment: Does the zoning ordinance deny housing opportunities for disability individuals with on-site housing supporting services? No. The definition for a family recognizes the need for supervisors, which is linked to on-site supportive services.

Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled? No, the City limits both. The number of unrelated persons in one household is restricted to ten and the occupancy limit for group homes is eight.

Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? No.

Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? No. Public hearings are required to obtain a subdivision, conditional use permit or variance, but the hearing is not specific to persons with disabilities.

Does the zoning ordinance address mixed uses? How are the residential land uses discussed? What standards apply? The City of Meridian has three mixed use zoning districts: Old Town, Traditional Neighborhood Center and Traditional Neighborhood Residential. Mixed use is addressed in Title 11, Chapter 2, Article B of City Code, and titled Traditional Neighborhood Districts. The Traditional Neighborhood District's purpose is "to encourage mixed use, compact development that is sensitive to the environmental characteristics of the land and facilitates the efficient use of services...A traditional neighborhood district diversifies and integrates land uses within close proximity to each other, and it provides for the daily recreational and shopping needs of the residents." The standards for developing within a mixed use area vary by zoning district - see MCC 11-2D-2.

Does the zoning ordinance describe any areas in this jurisdiction as exclusive? No.

Are there exclusions or discussions of limiting housing to any of the following groups: race, color, sex, religion, age, disability, marital status or familial status and/or creed of national origin? No.

Are there any restrictions for Senior Housing in the zoning ordinance? If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)? No. Senior housing is not uniquely addressed in the Code except in the definition of family.

Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? No.

Does the zoning ordinance establish occupancy standards or maximum occupancy limits? Yes. Households are all subject to occupancy limits. Households composed of unrelated persons are restricted to ten people and restricted to eight people for mentally and/or physically handicapped or elderly persons under staff supervision.

Does the zoning ordinance include a discussion of fair housing? No.

Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking. The City does not have explicit requirements for handicap parking for multi-family, or any other project. It is the responsibility of the applicant/developer to comply with ADA (MCC 113C-5A9).

Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? No.

Does the zoning code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit (cup)? No.

How are "special group residential housing" defined in the jurisdiction zoning code? Group housing is not defined in the code, but is referenced in other definitions:

- **Nursing or residential care facilities:** If the use results in more than ten (10) persons occupying a dwelling at any one time, the applicant or owner shall concurrently apply for a change of occupancy as required by the building code in accord with title 10 of this code. The owner and/or operator of the facility shall secure and maintain a license from the state of Idaho department of health and welfare, facility standards division.
- **Family:** A person living alone or two (2) or more persons related by blood or marriage; A group of not more than ten (10) persons who need not be related by blood or marriage living together in a dwelling unit; Eight (8) or fewer unrelated mentally and/or physically handicapped or elderly persons residing in a dwelling under staff supervision, provided that no more than two (2) staff members reside in the dwelling at any one time.

Does the jurisdiction's planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? Is there any provision for monitoring compliance? No.

Private Sector Actions

The concluding section in this chapter focuses on private sector actions that could present barriers to fair housing choice. It contains an analysis of Home Mortgage Disclosure Act (HMDA) data, which report lending activity of financial institutions.

HMDA data are widely used to examine potential discrimination in mortgage lending. Financial institutions have been required to report HMDA data since the 1970s, when civil rights laws prompted higher scrutiny of lending activity. The variables contained in the HMDA dataset have expanded over time, allowing for more comprehensive analyses and better results. However, despite expansions in the data reported, public HMDA data remain limited because of the

information that is *not* reported. As such, studies of lending disparities that use HMDA data carry a similar caveat: HMDA data can be used to determine disparities in loan originations and interest rates among borrowers of different races, ethnicities, genders, and location of the property they hope to own. The data can also be used to explain many of the reasons for any lending disparities (e.g., poor credit history). Violations of fair lending practices, however, generally originate with federal regulators who have access to a broader set of information (e.g., borrower loan files) of lending practices.

This section uses the analysis of HMDA data to determine if disparities in loan approvals and terms exist for loan applicants of different races and ethnicities. The HMDA data analyzed in this section reflect loans applied for by residents in 2014, the latest year for which HMDA were publicly available at the time this document was prepared. It also compares the results of the HMDA analysis with lending outcomes reported in the last AI.

This analysis was completed at the county level to provide a broader dataset of minority applicants and better detect any fair lending concerns. As discussed in Section I, the dissimilarity index was higher in the county than for the City alone.

Loan applications. During 2014, there were 15,791 loan applications processed in Ada County for home purchases, loan refinances, and home improvements. Twenty loan applications did not designate a census tract for where the home was located. Of the remaining 15,771 applications with a known census tract, 30 percent, or 4,768 applications, were located within the City of Meridian. This volume of applications is much lower than in prior years. In 2010, there were a total of 6,196 loan applications processed in Meridian.

Overall, more than half of the 8,607 loan applications (55%) were for home purchases. Another 44 percent were for refinances. Just 2 percent were for home improvements.

Nearly three-fourths (72%) of the loan applications were conventional (i.e., not government insured- or guaranteed), 14 percent were Federal Housing Administration-insured and 13 percent were Veterans Administration-guaranteed.

Figure V-2 shows the number and percentage of loan applications by race. Overall, White residents submitted more loan applications than any other racial or ethnic group. The Figure also provides a column comparing the racial and ethnic distribution of all County residents from the 2014 ACS. The percentage of Hispanic loan applicants (3%) was disproportionate to the percentage of the total Hispanic population (8%). Both White and Non-Hispanic residents experienced a similar trend of a lower percentage of applicants compared to their percentage of the total population.

**Figure V-2.
 Loan Applications Received by
 Race and Ethnicity, Ada
 County, 2014**

Note:

Does not include loans for multifamily properties or non-owner occupants. Data do not add to 100% because the "other" U.S. Census population category is not included.

Source:

FFIEC HMDA Raw Data, 2014, 2014 ACS and BBC Research & Consulting.

Race/Ethnicity	Applicants		Percent of Total Population
	Number	Percent	
Race			
American Indian or Alaska Native	81	1%	0%
Asian	306	2%	2%
Black or African American	93	1%	1%
Native Hawaiian or Pacific Islander	60	0%	0%
White	13,968	88%	93%
Ethnicity			
Hispanic	535	3%	8%
Non-Hispanic	13,997	89%	92%

Outcome of loan applications. Figure V-3 displays the actions taken on loan applications in 2014.

Of the potential actions that could be taken on a loan:

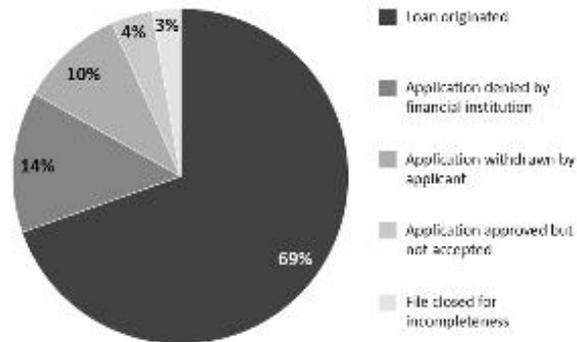
- "Loan originated" indicates that the application was approved and the applicant accepted the loan;
- "Approved, but not accepted" means that the application was approved, but the applicant chose not to accept the loan;
- "Denied by financial institution" signifies that the application was not approved;
- "Withdrawn by applicant" indicates that the applicant chose not to pursue the loan before an approval decision had been made; and
- "File closed for incompleteness" means that the application was incomplete and the loan was not evaluated.

More than two-thirds (70%) of all loans applied for were originated and 14 percent of applications were denied. Ten percent of loan applications were withdrawn by the applicant and the remaining applications were either approved but not accepted or closed for incompleteness.

**Figure V-3.
 Loan Applications and Action
 Taken, Ada County, 2014**

Note:
 Does not include loans for multifamily
 properties or non-owner occupants.

Source:
 FFIEC HMDA Raw Data, 2014 and BBC
 Research & Consulting.



The most recent distribution of loan application outcomes was similar to the outcomes for the City of Meridian in 2010: the percentage of denied loan applications (14%) remained the same in 2014. Loan applications that were originated were lower (67%) in 2010, but loan applications that were withdrawn by the applicant (11%) and approved but not accepted (7%) were higher. Overall, loan application actions since 2010 only differ slightly and reflect similar outcomes as 2014.

Outcome of applications by race and ethnicity. Figure V-4 presents more detail on the outcomes of loan applications, focusing on differences in race and ethnicity.

The racial and ethnic groups with the highest denial rate were Native Americans, with a denial rate of 20 percent, and Asians, African Americans and Hispanics, all with a denial rate of 16 percent. This compares to a denial rate of 14 percent for all loan applicants. Native Hawaiians/Pacific Islanders, White and Non-Hispanic residents had the lowest denial rate at 13 percent.

The mortgage lending outcomes shown in Figure V-4 differ from national and state outcomes in several ways. First, the difference in denials among African Americans and Whites was only 3 percentage points with more African Americans being denied than white residents. Nationally, the denial rate in 2014 was 25 percent for African American applicants, compared to just 10 percent of non-Hispanic White applicants—a difference of 15 percentage points. Second, denial rates for Asian applicants in Ada County were also higher than that of white applicants; this was also not the case nationally.

The HMDA analysis in the 2016 State of Idaho fair housing analysis found relatively high rates of denials for American Indian/Alaskan Native, Hispanic and Native Hawaiian/Pacific Islander applicants. Denial rates for other racial groups were not significantly different than the denial rates for White applicants.

**Figure V-4.
 Outcome of Mortgage Loan Applications by Race and Ethnicity, Ada County, 2014**

Race/Ethnicity	Percent Originated	Percent Approved but Not Accepted by Applicant	Percent Denied	Percent Withdrawn	Percent Incomplete
Race					
American Indian or Alaska Native	64%	4%	20%	11%	1%
Asian	68%	3%	16%	10%	2%
Black or African American	68%	3%	16%	9%	4%
Native Hawaiian or Pacific Islander	67%	5%	13%	10%	5%
White	71%	4%	13%	10%	3%
Ethnicity					
Hispanic	67%	5%	16%	9%	3%
Non-Hispanic	71%	4%	13%	10%	3%
<i>African American/White Difference</i>	-3%	-1%	3%	-1%	2%
<i>American Indian/White Difference</i>	-6%	0%	7%	1%	-1%
<i>Hispanic/non-Hispanic Difference</i>	-3%	1%	3%	-1%	0%

Note: Does not include loans for multifamily properties or non-owner occupants.
 Source: FHEC HMDA Raw Data, 2014 and BBC Research & Consulting.

Loan origination rates were somewhat similar across racial and ethnic categories, all above 60 percent. Native American applicants had the lowest origination rate at 64 percent. Non-Hispanic and White applicants had the highest rates both at 71 percent.

Idaho's applications by race and ethnicity. In the State of Idaho, American Indian/Alaska Native applicants had loans originated 55 percent of the time; Asian applicants, 62 percent; African Americans, 62 percent; and White applicants, 66 percent. Hispanic borrowers had loans originated 58 percent of the time—eight percentage points lower than non-Hispanic applicants. Across all races and ethnicities, Ada County's loan originations were higher than that of the state.

Outcomes and types of loans. Loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution.

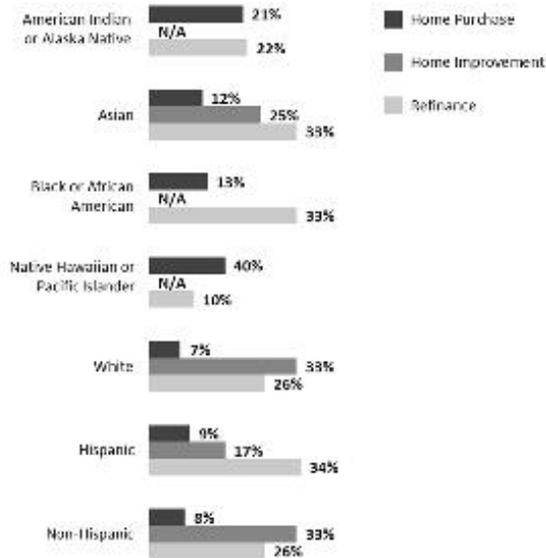
An examination of the types of loans applied for by applicants of varying races and ethnicities found that Native Hawaiian/Pacific Islander applicants were much more likely than other applicants to apply for home purchase loans (75% of loan applications). White, Non-Hispanic and Hispanic applicants had a lower rate of applications for home purchase loans (56% of loan applications). Applications for home improvement loans were low among all races and ethnicities, ranging from 0 to 2 percent of applications. Among minority groups, Hispanic applicants were the most likely of all applicants to apply for refinancing loans, while Native Hawaiian/Pacific Islander applicants were least likely to apply for refinancing loans.

Figure V-5 displays the denial rate by race and ethnicity and loan purpose. Denial rates for home purchases are relatively low across racial and ethnic groups except for Native Americans and Native Hawaiians/Pacific Islanders. Home purchase denials are lowest for White, Non-Hispanic and Hispanic borrowers. Asian, African American and Hispanic borrowers experienced a denial rate of one-third for refinancing loans. In general, denials were higher for home improvement and refinancing loans, as these can hold more risk than a home purchase loan.

Figure V-5.
Denial by Race and Ethnicity and Loan Purpose, Ada County, 2014

Note:
 Excludes denial rates when fewer than 20 loans were made; denoted as N/A.

Source:
 FFEC HMDA Raw Data, 2014 and BBC Research & Consulting.



Ada County loan applicants were denied home purchase loans at about the same rate (14%) compared to applicants nationally (13%) and higher than all applicants in the State of Idaho (10%).

Outcomes and income levels. Figure V-6 examines differences in loan origination and denial rates by income range. As shown by Figure V-6, the difference in approval rates was modest, except for the lowest income applicants.

Figure V-6.
Mortgage Loan Application Originations and Denials by Income Level, Ada County, 2014

Note:
 Does not include loans for multifamily properties or non-owner occupants.

Source:
 FFEC HMDA Raw Data, 2014 and BBC Research & Consulting.

	Originated	Denied
Less than 50% MFI	54%	29%
50-80% MFI	68%	16%
80-100% MFI	73%	12%
100% MFI+	72%	12%

Reasons for denial. HMDA data contain some information on why loans were denied, which can help to explain differences in denials among racial and ethnic groups. Figure V-7 shows the reasons for denials in Ada County.

For all racial and ethnic categories, high debt-to-income ratio and inadequate or poor credit history were the top reasons for denials.

Inadequate or poor employment history and unverifiable information were very minor reasons.

There are many reasons why loan origination rates may be lower for certain racial and ethnic groups. First, some racial and ethnic groups are very small, so the pool of potential borrowers is limited and may skew towards lower income households, since minorities typically have lower incomes. Second, minority applicants are more likely to not accept their loan offers, even if they are approved. Differences in the completeness of loan applications and withdrawal of applications by potential borrowers also affect the origination rates.

Denial rates exhibit significant variation over time, according to the Federal Reserve, driven by changes in demand for certain types of loans, variation in borrower type and changes in credit standards. Nationally, denial rates on home purchase applications in 2014 was very low—even lower than during the housing boom years. The relatively low denial rate in 2014 is attributed to a drop in applications from riskier applicants, perhaps related to tightening of credit availability and lending standards.

Figure V-7.
Reasons for Denials of Loan Applications by Race and Ethnicity of Applicant, Ada County, 2014

Race/Ethnicity	Collateral Insufficient	Credit Application Incomplete	Credit History Inadequate/Poor	Debt-to-Income Ratio Too High	Employment History Inadequate/Poor	Insufficient Cash (downpayment, closing costs)	Unverifiable Information	Other Reasons
Race								
American Indian or Alaska Native	0%	14%	43%	29%	0%	14%	0%	0%
Asian	2%	5%	33%	36%	2%	2%	10%	7%
Black or African American	0%	13%	25%	50%	13%	0%	0%	0%
Native Hawaiian or Pacific Islander	14%	0%	29%	29%	0%	29%	0%	0%
White	17%	13%	25%	27%	3%	3%	3%	9%
Ethnicity								
Hispanic	13%	10%	25%	38%	0%	2%	3%	10%
Non-Hispanic	16%	13%	26%	27%	3%	3%	3%	9%

Note: Does not include loans for multifamily properties or non-owner occupants.
 Source: FFIEC HMDA Raw Data and 2014 and BBC Research & Consulting.

Subprime loans. The subprime lending market declined significantly following the housing market crisis. Nationally, in 2014, only about 3 percent of conventional home purchases and 2 percent of refinance loans were subprime. Interestingly, nationally, small banks and credit unions were much more likely to originate subprime loans than were mortgage companies or large banks in 2014.^{2, 3}

In 2014, in Ada County, 4.9 percent of the loans were subprime. The average interest rate above the prime rate was 3 percent. A borrower with a subprime rate would pay, on average, about \$4,000 more per year than a prime rate borrower, or about \$120,000 over the life of the loan. Given that the top reasons for denials in the county were high debt-to-income ratio and inadequate or poor credit history—and considering the high cost of subprime loans to a borrower—this is an area that the county should monitor.

Summary

This section examines public and private decisions that affect housing choice, including the public provision and regulation of housing and access to mortgage financing. The primary findings include:

- The procedures and practices of the Boise City/Ada County Housing Authority, and the City's land use and zoning regulations, do not appear to create barriers to housing choice and are in line with HUD regulations. Despite the BCACHA weighting preferences equally among the elderly, disabled and families with minor children, some barriers to housing choice may exist because of physical inaccessibility of housing units, lack of local services and aging multifamily units that are not being properly maintained.
- The differences in mortgage loan denials among borrowers of varying races and ethnicities are minor, particularly when compared to denials nationally. Native American applicants have the highest gap in loan origination rates when compared to non-Hispanic White applicants.

² For the purposes of this section, "subprime" is defined as a loan with an APR of more than three percentage points above comparable Treasuries. This is consistent with the intent of the Federal Reserve in defining "subprime" in the HMDA data.

³ http://www.federalreserve.gov/pubs/bulletin/2015/pdf/2014_HMDA.pdf

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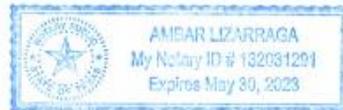
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 MERIDIAN, ID 836422619

**CITY OF MERIDIAN
 NOTICE OF PUBLIC HEARING
 AND PUBLIC COMMENT
 PERIOD
 Regarding Meridian's Community Development Block Grant (CDBG) Program**

The City of Meridian is designated an Entitlement Community by the U.S. Department of Housing and Urban Development (HUD). This designation allows the City to receive funds annually from HUD's Community Development Block Grant (CDBG) Program. The City anticipates that it will receive an allocation of \$489,753 on October 1, 2020. In order to receive these funds, the City must submit an Annual Action Plan to HUD identifying the projects and goals the City will undertake to improve accessibility, enhance housing opportunities, and provide social services to low and moderate income residents during the next Program Year.

ALL CITIZENS ARE INVITED TO ATTEND A VIRTUAL PUBLIC HEARING ON TUESDAY, JULY 21, 2020 AT 6:00P.M. at <https://meridiacity.org/live> regarding the 2020 Annual Action Plan. Special invitation is extended to persons with disabilities, residents of assisted housing, and Meridian business and property owners. Meridian City Hall is a handicapped accessible facility. Individuals requiring accommodation of physical, sight, or hearing impairments or language interpretation please contact the City Clerk at (208) 888-4433. All citizens may review the draft plan and provide testimony. Copies of the draft plan are available beginning June 19, 2020 at the Meridian City Hall in the Community Development Department, and on the City's CDBG website, <http://meridiacity.org/cdbg>.

A PUBLIC COMMENT PERIOD OPENED JUNE 19, 2020 AND WILL CONTINUE THROUGH JULY 21, 2020. During this period, oral and written comments about the 2020 Annual Action Plan will be accepted. All comments should be addressed to Crystal Campbell at: City of Meridian, Community Develop



VICTORIA RODELA, being duly sworn, deposes and says: That she is the Principal Clerk of The Idaho Statesman, a daily newspaper printed and published at Boise, Ada County, State of Idaho, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of twelve consecutive months prior to the first publication of the notice, a copy of which is attached hereto; that said notice was published in The Idaho Statesman, in conformity with Section 60-108, Idaho Code, as amended, for:

1 Insertions

Beginning issue of: 06/19/2020

Ending issue of: 06/19/2020

V Rodela

(Legals Clerk)

On this 19th day of June in the year of 2020 before me, a Notary Public, personally appeared before me Victoria Rodela known or identified to me to be the person whose name subscribed to the within instrument, and being by first duly sworn, declared that the statements therein are true, and acknowledged to me that she executed the same.

Amber Lizarraga

Notary Public in and for the state of Texas, residing in Dallas County

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83642; (208) 489-0575; or cca
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LEGAL NOTICE

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**AFFIDAVIT OF PUBLICATION
STATE OF IDAHO**

County of Ada

}SS.
}

Sharon Jessen
of Nampa, Canyon County, Idaho, being
first duly sworn, deposes and says:

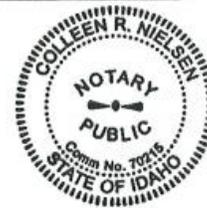
1. That I am a citizen of the United States, and at all times hereinafter mentioned was over the age of eighteen years, and not a party to the above entitled action.
2. That I am the Principle Clerk of the Meridian Press, a weekly newspaper published in the City of Meridian, in the County of Ada, State of Idaho; that the said newspaper is in general circulation in the said County of Ada, and in the vicinity of Meridian, and has been uninterruptedly published in said County during a period of seventy-eight consecutive weeks prior to the first publication of this notice, a copy of which is hereto attached.
3. That the notice, of which the annexed is a printed copy, was published in said newspaper 1 time(s) in the regular and entire issue of said paper, and was printed in the newspaper proper, and not in a supplement.

That said notice was published the following:
06/26/2020

Sharon Jessen
STATE OF IDAHO)
County of Canyon)

On this 26th day of June in the year of 2020 before me a Notary Public, personally appeared Sharon Jessen, known or identified to me to be the person whose name is subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledge to me that he/she executed the same.

Colleen R. Nielsen
Notary Public for Idaho
Residing at Canyon County
My Commission expires 06/28/2023



Website

The screenshot shows a web browser window with the URL meridiancity.org/cdbg/. The website header includes the Meridian City logo and navigation menus for Residents, Business, City Government, Stay Informed, Search, and Pay Utility Bill. A red banner at the top left reads "COVID-19 UPDATES". The main heading is "Program Year 2020 (PY20) Action Plan" with a sub-heading "October 1, 2020 to September 30, 2021". The text states: "The PY20 Action Plan is open for public comment beginning June 19, 2020 and will end at the public hearing on July 21, 2020. This document serves as the annual application for CDBG funding and provides an outline of proposed projects and intended accomplishments for the upcoming year." Below this are three blue links: "Click here for a quick overview of the PY20 Action Plan.", "Click here for the PY20 Action Plan Flyer.", and "Click here for the PY20 Draft Action Plan." A section titled "The following presentations of the PY20 AP are available to the public:" lists two items: "July 7, 2020 during the City Council meeting" and "July 21, 2020 during the City Council meeting". At the bottom, it says "Questions and comments can be provided during the above forums or by contacting Crystal Campbell at ccampbell@meridiancity.org or (208) 489-0575." The Windows taskbar at the bottom shows the search bar, task view, and various application icons, with the system tray displaying the time as 4:12 PM on 6/19/2020.

Resolution

CITY OF MERIDIAN

RESOLUTION NO. 20-2218

BY THE CITY COUNCIL:

BERNT, BORTON, CAVENER, HOAGLUN,
PERREAULT, AND STRADER

A RESOLUTION APPROVING ADOPTION OF THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM YEAR 2020 ACTION PLAN AND SUBMISSION TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; AUTHORIZING THE MAYOR AND CITY CLERK TO EXECUTE AND ATTEST THE SAME ON BEHALF OF THE CITY OF MERIDIAN; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, it is necessary that an annual action be submitted to the United States Department of Housing and Urban Development ("HUD") in order to receive Community Development Block Grant ("CDBG") funding for the Program Year 2020; and

WHEREAS, the City held a public hearing on the Program Year 2020 Action Plan on July 21, 2020, and held a public comment period on the draft application materials from June 19, 2020 to July 21, 2020;

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND CITY COUNCIL OF THE CITY OF MERIDIAN, IDAHO:

Section 1. That the Program Year 2020 Action Plan, and its certification documents, copies of which are attached hereto as EXHIBIT A and incorporated herein by reference, be, and the same hereby are, adopted as to both form and content.

Section 2. That the Community Development Program Coordinator be, and hereby is, authorized to submit such Program Year 2020 Action Plan to HUD.

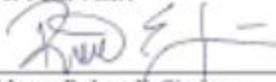
Section 3. That the Mayor and the City Clerk be, and they hereby are, authorized to respectively execute and attest the certifying documents for the Program Year 2020 Action Plan for and on behalf of the City of Meridian.

Section 4. That this Resolution shall be in full force and effect immediately upon its adoption and approval.

ADOPTED by the City Council of City of Meridian, Idaho this 28th day of July, 2020.

APPROVED by the Mayor of the City of Meridian, Idaho, this 28th day of July, 2020.

APPROVED:



Mayor Robert E. Simpson

ATTEST:

By:  
Chris Johnson, City Clerk

SF 424's and Certifications

DMS Number: 4340-0004
 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
6a. Federal Entity Identifier: <input type="text"/>	6b. Federal Award Identifier: <input type="text" value="H-20-MC-16-0004"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Meridian"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="82-6009225"/>	* c. Organizational DUNS: <input type="text" value="0284512670900"/>	
d. Address:		
* Street: <input type="text" value="33 E. Broadway Ave."/> Street2: <input type="text"/>	* City: <input type="text" value="Meridian"/> County/Parish: <input type="text"/> * State: <input type="text" value="ID: Idaho"/> Province: <input type="text"/> * Country: <input type="text" value="USA: UNITED STATES"/> * Zip/ Postal Code: <input type="text" value="83642-2619"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Community Development"/>	Division Name: <input type="text" value="Economic Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mrs."/> * First Name: <input type="text" value="Coyolal"/>	Middle Name: <input type="text"/> * Last Name: <input type="text" value="Campbell"/> Suffix: <input type="text"/>	
Title: <input type="text" value="Community Development Program Coordinator"/>		
Organizational Affiliation: <input type="text" value="City of Meridian"/>		
* Telephone Number: <input type="text" value="(208) 489-8575"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="ccampbell@meridiancity.org"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="United States Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CFDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="14.210"/>	
* Title: <input type="text" value="Community Development Block Grants/Entitlement Grant"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Invest funds to create/sustain suitable living environments, expand affordable housing opportunities, eliminate slum and blight, and administer Meridian's CDBG Program."/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="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:

17. Proposed Project:
 * a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	489,753.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	489,753.00

*** 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:

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 28, 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.

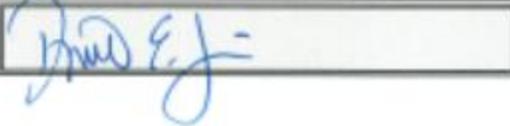
Authorized Representative:

Prefix: * First Name:
 Middle Name:
 * Last Name:
 Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0009
Expiration Date: 03/28/2022

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

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

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

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

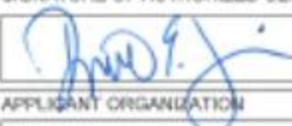
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 800, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1965 (42 U.S.C. §§2001 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition Usable

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11730; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Meridian	7/28/2020

SF-424D (Rev. 7-97) Back

CERTIFICATIONS

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

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

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

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal 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;

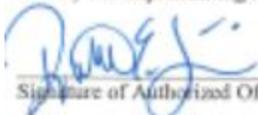
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official

7/13/20

Date



Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019, 2019, 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

Excessive Force – It has adopted and is enforcing:

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

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

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

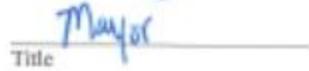
Compliance with Laws -- It will comply with applicable laws.



Signature of Authorized Official



Date



Title

OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature of Authorized Official

7/13/20
Date

Mayor
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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