

RESOLUTION 2012-22

A RESOLUTION APPROVING THE CITY OF FRANKLIN 2012-13 CDBG ANNUAL ACTION PLAN AND, AUTHORIZING A REQUEST TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR CDBG PROGRAM FUNDS

WHEREAS, Regulation 24 CFR Part 91 issued by the U. S. Department of Housing and Urban Development (HUD) requires the city to submit and receive HUD approval of a Consolidated Plan and Annual Action plan as part of a HUD-approved Consolidated Plan for the City of Franklin; and

WHEREAS, Title 1 of the Housing and Community Development Act of 1974, as amended, establishes a Community Development Block Grant (CDBG) program for the purpose of developing viable urban communities by providing decent housing and suitable living environment and expanding economic opportunities and preventing and/or eliminating conditions of blight, principally for persons of low and moderate income; and

WHEREAS, the City of Franklin desires to carry out HUD-funded programs;

WHEREAS, on April 27, 2010 the City of Franklin Board of Mayor and Alderman approved Resolution 2010-23 and the 2010-2015 Consolidated Plan.

NOW, THEREFORE, BE IT RESOLVED, that and the 2012-13 CDBG Annual Action Plan of the City of Franklin Consolidated Plan for Housing and Community Development is hereby adopted and approved.

BE IT FURTHER RESOLVED, that the City of Franklin and its officials are authorized and directed to assume full responsibility for assuring that its Consolidated Plan and associated housing initiatives are carried out in full compliance with HUD issued regulations and authorizing appropriate city officials to execute any documents with HUD to implement the CDBG program.

BE IT FURTHER RESOLVED, that any changes to the anticipated CDBG funding will be apportioned on a pro rata share to the categories in the Annual Action Plan and that the City of Franklin and its officials understand that to achieve the overall goal of assisting low- and moderate-income families with decent, affordable housing the shifting of funds from one category to another is allowed provided the appropriated funding within any category is not reduced more than fifty (50) percent unless an amendment to the Consolidated Plan is approved in accordance with HUD regulations.

Approved this _____ day of April, 2012

ATTEST:

CITY OF FRANKLIN, TENNESSEE

BY: _____
ERIC S. STUCKEY
City Recorder/Administrator

BY: _____
DR. KEN MOORE
Mayor



Third Program Year Action Plan

The CPMP Second Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 3 (July 1, 2012 – June 30, 2013) Action Plan Executive Summary:

Franklin Consolidated Plan Executive Summary

Background:

In 2007, the City of Franklin became an "entitlement city" for Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). This means that the City of Franklin receives funding each year from HUD on a formula basis. It is estimated that third year funding under the new Consolidated Plan will be approximately \$227,180 for a program year that begins July 1 and ends June 30 of each year. Receipt of funds is subject to HUD's approval of the Consolidated Plan. The final allocation amount may be increased or decreased depending upon the final amount of the annual Congressional appropriation.

Purpose of the Consolidated Plan:

In order to receive CDBG funds to which it is entitled, HUD requires the City of Franklin to compile a *Consolidated Plan*. According to HUD's regulations, the overall goal of the Consolidated Plan "is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons (Code of Federal Regulations 24 Part 91.1)." Individuals and families with an income at or below 80 percent of the area median income based on family size are considered low and moderate income. For example, in 2012 the area median income for a family of four was \$67,100. Eighty percent of this amount is \$53,700. For a two person household, 80 percent of the median income is \$43,000. HUD updates and publishes area median incomes each year. The HUD web address for checking median income is www.hud.gov/offices/cpd/affordablehousing/programs/home/limits/income/

Through the Consolidated Plan, HUD requires that the City of Franklin state its plans to pursue the goals of decent housing and a suitable living environment and

expanding economic opportunity for its lower income citizens. HUD will evaluate the City of Franklin's performance in attaining the goals and strategies set forth in the Consolidated Plan.

Functions of the Consolidated Plan:

The Consolidated Plan serves the following functions:

- a. It is a **planning document** for the City of Franklin, which is built using a public participation process that begins at the grassroots community level.
- b. It is the **annual application** to HUD for CDBG funds and for other funds that may be granted to the City of Franklin through other HUD formula grant programs.
- c. It contains the **strategy** for carrying out the CDBG program.
- d. It is an **action plan** that provides the basis for assessing the City of Franklin's performance by HUD and its citizens.

Objectives and Outcomes Summary:

Objective 1: Continue Emergency Demonstration Rehabilitation Program

Goals: 10 projects annually.

Objective 2: Continue Community Based Development Organization Program

Goals: 1 project annually

Objective 3: Continue a Homeownership and Fair Housing Counseling Program.

Goal: Counsel 13 households in homeownership responsibilities.

Goal: Conduct Fair Housing education outreach program to residents, landlords, and the real estate industry

Objective 4: Identify and fund homeless prevention programs

Goal: Improve the condition, capacity, or availability of homeless shelters

Objective 5: Acquire vacant property

Goal: Identify vacant property in strategic location for acquisition and development

Resources

Community Development Block Grant funding is the primary resource for completing Objectives 1, 3, and 5. Objectives 2 and 4 will be completed with a combination of CDBG funds, private funds of the CBDOs and shelters on-hand, applied for,

borrowed, or donated and other public funds or in-kind contributions, as may be available.

The City of Franklin and any other subgrantees will seek to identify and leverage additional funds during the five year planning period to expand the scope and goals of the above programs, and to support other associated community and economic development projects.

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission

The mission of the Community Development Block Grant program in Franklin is to develop, in cooperation with its resident, business partners, and not-for-profit housing agencies, viable urban communities by providing decent housing and a suitable living environment and to expand economic opportunities principally for low- and moderate-income persons.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 3 Action Plan General Questions response:

Overview of Franklin

Franklin has grown from a very small, agricultural community into a strong blend of residential, commercial, and corporate citizens. The City of Franklin has a positive, national reputation reflecting safe, clean, attractive residential neighborhoods, an economically viable downtown, and the emerging, internationally-known Cool Springs area.

Downtown Franklin, comprised of a beautiful 15 block historic district, offers visitors a great American main street town and 200 years of rich history. Visitors will find commemorative brick sidewalks, beautiful landscape, lovely Victorian architecture, and stunning renovated historic buildings in the commercial district located in the heart of Franklin. Downtown Franklin offers elegant shopping, restaurants, antique shops, a variety of clothing stores, art galleries, professional services, and more. Downtown Franklin offers true Southern hospitality and an array of shopping and dining within Middle Tennessee. Franklin is only 15 miles and 100 years down the road from Nashville. Franklin is indeed a great place to visit, a great place to live, a great place to shop . . .

Franklin Demographics

Population:

Franklin's 2000 population was 41,756 persons. The 2000 Census showed 28% of the residents were under the age of 18 and 7.5% were 65 years of age or older. Over 80% of the residents were non-Hispanic white, slightly over 10% were non-Hispanic Black/African American, nearly 5% were Hispanic/Latino, and a smaller number of persons were Asian or multiracial. In 2000 there were 16,092 households with an average size of 2.5 persons.

According to the 2006-2008 American Community Survey 3 Year Estimates (3 Year ACS), Franklin's population is 55,181. Residents under the age of 18 account for 25.5% of the population, 9.3% are 65 years of age or older. Eighty-six percent (86%) of the residents are non-Hispanic white, 9% are non-Hispanic Black/African American, and 3% are non-Hispanic Asian. Residents with Hispanic or Latino ethnicity total slightly over 7% of the population. There are 20,626 households, an increase of over 20% since 2000, with an average size of 2.7 persons.

Income and Education:

The median 2000 household income was \$56,431. Although relatively high, 6.7% of the population had incomes at or below the poverty rate and the unemployment rate is 3.2%, indicating persons and areas to be targeted with Community Development Block Grant funds. For persons 25 years of age or older, close to 11% had no high school diploma or GED. Forty two percent (42%) of the population held bachelors or graduate/professional degrees.

According to the 3 Year ACS, median household income has risen to \$76,332. By contrast, 5.5% of the population has incomes at or below the poverty rate and the unemployment rate is 2.8%. For persons 25 years of age or older, 6% have no high school diploma or GED. Fifty one percent (51%) of the population hold bachelors or graduate/professional degrees. In comparing incomes and poverty rates to 2000, it is important to note the 3 Year ACS does not capture negative impacts since 2008 due to the general economy.

Housing Overview:

In 2000, there were 17,214 housing units, with a homeownership rate of 63.5%. Nearly 60% of the housing units are single-family detached homes. Housing structures in Franklin had a median age of less than 10 years in 2000, reflecting the robust growth being experienced by the City. The median value of owner-occupied housing was \$184,500 and the median gross rent was \$758.

According to the 3 Year ACS, there are 21,691 housing units in Franklin, with a homeownership rate of 68%. Sixty three percent (63%) of the housing units are single-family detached homes. Twenty three percent (23%) of the housing structures have been built since 2000. The median value of owner-occupied housing is \$307,700 and the median gross rent is \$1,044, representing increases since 2000 of 60% and 73% respectively.

Geographic Areas of Special Significance

All of Central Franklin's neighborhoods are important, from the standpoint of the homes and sense of community they provide, for their rich architectural character and history, and for the role they play in supporting the downtown core. However, two of Central Franklin's neighborhoods in particular face unique issues that warrant the focus of the Community Development Block Grant program: Natchez and Hard Bargain (see Appendix A for a map).

Natchez Neighborhood:

The Natchez Neighborhood has its roots deeply embedded in Central Franklin's earliest days, having been settled by freed slaves following emancipation. Natchez Street was one of the main roads that comprised the Natchez Trace as it passed through the area. According to neighborhood residents, Natchez in its prime was a diverse neighborhood of residential homes and businesses, including grocery stores, nightclubs, theaters and other local services. During the past century, many of the original homes have been demolished and reconstructed or have had new "shells" built around existing buildings. As a result, the neighborhood includes a mix of structures ranging in condition from well maintained and viable to severely deteriorated. Homes in the neighborhood remain largely occupied by direct descendants of its original settlers, and many of the homes are passed down to family members, which result in a high owner-occupancy rate. Much of the concern for the future of Natchez, as described by members of Natchez Place, Inc. and residents of the neighborhood stems from a sense of detachment from the rest of the City and general decline in the level of maintenance of homes in the areas that some fear will lead to wholesale redevelopment.

Hard Bargain:

Hard Bargain Neighborhood is a small, traditionally African-American neighborhood located just west of the downtown core. It lies across from the Toussaint L'Ouverture Cemetery, which was started for Franklin's African-American community in 1864, and was added to the National Register of Historic Places in 1995. The neighborhood is characterized by its modest homes, one of which is a home built by Harvey McLemore, a former slave, and is now a neighborhood landmark. The home has been renovated and restored as a museum highlighting African-American heritage in Franklin. Hard Bargain residents have many of the same concerns for the future of their neighborhood as do residents of the Natchez neighborhood: a sense of detachment from the rest of the City and a general decline in the level of

maintenance of homes in the area that some fear will lead to wholesale redevelopment.

Allocating Investments and Assigning Priorities:

Initially, the city targeted 100% of its Community Development Block Grant funds to the Natchez and Hard Bargain Neighborhoods. During the original three-year Consolidated Plan period, the targeting of these neighborhoods remained, but CDBG programs, in particular the emergency rehabilitation program was expanded to include other eligible neighborhoods and persons. Regardless of where, priorities established in later sections of the Consolidated Plan are largely based on the above identified obstacles, namely a sense of detachment and a general decline in the level of maintenance and corresponding need for home rehabilitation services.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 3 Action Plan Managing the Process response:

Lead Agency and Significant Aspects of the Planning Process

The City of Franklin is the entity responsible for overseeing the development of the Consolidated Plan. The City of Franklin is governed by a Board of Mayor and Aldermen. There are eight Aldermen on the Board. Four Aldermen are elected from the four political divisions of the City called wards; four are elected at-large. This governing board is responsible for deciding on the city's policies and procedures by passing Resolutions, Municipal Ordinances and the Municipal Code, all of which are implemented by the various City Departments.

The Department of Administration is the City agency charged with developing the Consolidated Plan and implementing its programs. The City Administrator is responsible for the daily operations and management of the City and its more than 600 employees, as well as overseeing a General Fund budget of over \$53 million. Within the City Administrator's Office reside the Assistant City Recorder for Records, Human Resources, Legal, Community Relations and Public Safety. The City Administrator is directly responsible for two Assistant City Administrators who oversee the service areas (Street, Engineering, Finance, Planning, Solid Waste, Water and Wastewater and Community Development), as well as the Parks and Recreation Department. The Community Development office directly administers the Consolidated Plan programs.

Consultations

During the preparation of this Consolidated Plan, the Department of Administration consulted with other Franklin City Departments and agencies, neighborhood groups, housing advocates and organizations, businesses, developers, faith-based organizations and churches, social service entities, and State and County governments. These consultations and meetings facilitate relationships and collaborations, particularly as they relate to community development and affordable housing issues.

The following groups have been involved in the process of preparing the Consolidated Plan. The listing is in no particular order.

- Affordable and Workforce Housing Advisory Committee
- Fair Housing Committee
- United Way of Williamson County
- Fifth Third Bank
- Regions Bank
- United Community Resource Foundation
- Williamson Works
- Williamson County Economic Development Agency
- Trace Realty
- CASH Alliance
- Affordable Housing Resources
- Tennessee Housing and Development Agency
- Shorter Chapel
- GAP Community Development Organization
- The Housing Fund
- Franklin Housing Authority
- Community Housing Partnership of Williamson County
- Board of Mayor and Alderman, City of Franklin
- PLA Media
- Franklin Tomorrow

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 3 Action Plan Citizen Participation response:

Introduction to the Citizens Participation Plan:

The Citizen Participation Plan is designed to foster citizen involvement in the development, implementation and evaluation of housing and community development programs, particularly the Community Development Block Grant program, in the City of Franklin. It is designed to meet the requirements for preparation and implementation of the Consolidated Plan for housing and community development needs of the City of Franklin. Completion of the Consolidated Plan is required by the U.S. Department of Housing and Urban Development in order for the City of Franklin to receive federal funds allocated through the Community Development Block Grant program. Information regarding resident participation procedures for the Comprehensive Modernization Plan for public housing will be included in this document.

The City of Franklin’s Community Development Office is the Lead Agency for the preparation of the Consolidated Plan under the direction of the Assistant City Administrator for Community Development.

Definitions:

The following definitions apply to terms used in the Citizen Participation Plan and the Consolidated Plan.

- CAC** — Citizen Advisory Committee
- CDBG** — Community Development Block Grant
- CBDO** — Community Based Development Organization
- Entitlement City** – A governmental jurisdiction that receives grant funds on a formula basis directly from HUD
- ESG** — Emergency Shelter Grant
- Extremely Low Income** — Households with income below 30 percent of the area median income
- HOME** — HOME Investment Partnerships Act
- HOPWA** — Housing Opportunities for Persons with AIDS
- Low Income** — Households with income below 50 percent of the area median income
- HUD** – U.S. Department of Housing and Urban Development
- MFI** – Median Family Income
- Moderate Income** — Households with income between 51 and 80 percent of the area median income

General Policies and Procedures

Citizen Participation:

Participation activities are designed to provide for and encourage the participation of all citizens, with an emphasis placed on residents with moderate, low, or extremely low household incomes, who are most likely to be affected by the expenditure of housing and community development funds. Participation is encouraged at all stages of the planning, development and evaluation of housing and community development programs by all those who may be affected, or wish to be involved in the process.

Efforts will be made to assure that minorities, non-English speaking persons, as well as persons with mobility, visual or hearing impairments, or other disabilities have adequate assistance required to fully participate in the process. Anyone needing special assistance or interpretation service, may make special arrangements by contacting the Interim Housing Coordinator, Community Development Office at (615) 550-6608.

Citizen Advisory Committee:

In order to hear from those persons most likely to be affected, a Citizen Advisory Commission has been established and provides advice and consultation on the preparation, development and evaluation of housing and community development activities contained in the Consolidated Plan. This Commission consists of a cross section of Franklin residents, including representatives from any targeted investment areas that may be established, members of public housing resident and neighborhood associations, and other lower income persons. The focus of the committee is on hearing from potential recipients of service and from service administrators. The Commission meets monthly on community development topics. Meetings are held at a time and place that is convenient to the members and open and accessible to the public.

Access to Information:

Citizens will be given multiple opportunities to assess and comment on all aspects of the Consolidated Plan. This may be done at any point through the Commission meetings, community meetings, written comments to the City of Franklin and at advertised public hearings and meetings held at convenient times and locations. Citizens, public agencies and other interested parties, including those households most affected, will have the opportunity to receive information, review and submit comments on the proposed Consolidated Plan, including estimates of the amount designed to benefit low, and moderate income residents. Information regarding the Consolidated Plan and the CDBG program in the City of Franklin will be maintained on the City of Franklin's website under the "News and Information" heading on the homepage or by going directly to www.franklin-gov.com/cdba.html. The Consolidated Plan, performance reports, and amendments will be made available to citizens free of charge. These documents may be obtained by calling (615) 550-6608. Program records will be available to interested parties for at least a period of five years. Most records are maintained at the City of Franklin, Community Development Office, located in City Hall at 109 3rd Avenue South. Records may be reviewed by appointment during regular business hours.

Technical Assistance:

The City of Franklin has contracted with The Housing Fund to provide technical assistance on helping groups that represent low and moderate income persons that request assistance in developing proposals for programs covered by the Consolidated Plan. The Housing Fund may be reached by calling (615) 780-7000.

Residential Anti-Displacement Plan:

It is the policy of the City of Franklin to minimize displacement of persons and to assist any persons displaced. A Residential Anti-Displacement Plan and an explanation of the types and levels of assistance available are included in a Relocation Plan. However, the City under its CDBG program undertakes no projects that would result in the displacement, even temporary displacement, of its residents.

Public Hearings:

A minimum of two public hearings will be held each year regarding the Consolidated Plan submission. While every effort will be made to hold these meetings at the same time and location as outlined in the Plan, the meetings will be widely publicized each year. Notification of the public hearings will be published as outlined below in the Meeting Notices section of the Plan. Efforts will be made to have child care available at Public Hearings to make it more convenient for persons with small children to attend. Most public hearings will be held at City Hall located at 109 3rd Avenue South or other convenient locations. These locations are accessible to people with disabilities.

a. Public Hearing on the Consolidated Annual Performance and

Evaluation Report (CAPER). It is anticipated that the CAPER public hearing will be held in the early evening of a day in August beginning in 2008. The purpose of the hearing is:

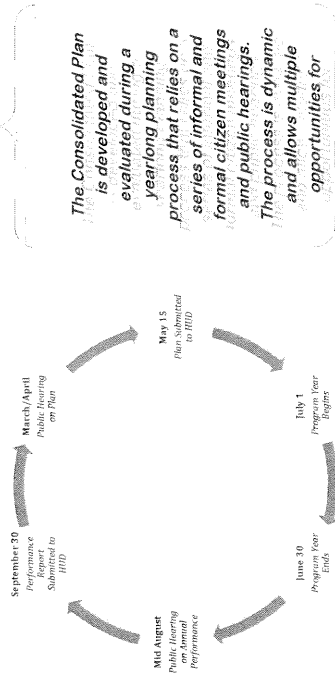
- to obtain the view of citizens, public agencies and other interested parties regarding the identification of housing and community development needs within the City of Franklin
- to respond to proposals and comments received from citizens; and
- to review program performance for the previous program year.

The public comment period for the performance report will be no less than 15 days. Included in the annual performance reports will be copies of submitted comments; assessment of these comments, and a summary of any action taken in response to these comments. A copy of the annual performance report can be obtained free of charge from the City of Franklin Community Development Office. This public hearing will be held before the proposed Consolidated Plan or annual update is drafted.

b. Public Hearing on the Consolidated Plan.

The Consolidated Plan public hearing will be held for the purpose of receiving comments on the proposed plan during the 30 day public comment period. The proposed Consolidated Plan will include information regarding the amount of federal, state and local assistance that is expected to be received by the City of Franklin, information regarding the range of activities to be undertaken, including the amount that will benefit low and moderate income persons and the plans to minimize residential displacement and to assist any persons who may be displaced due to housing and community development activities. This Consolidated Plan public hearing is scheduled to be held in the early evening of a day of March beginning in 2008.

Consolidated Plan Timeline With Benchmarks



Timely Response:

City of Franklin staff or its consultants will provide a response to all complaints, either written or verbal in a timely manner. Written complaints should be directed to Interim Housing Coordinator, Community Development Office, 109 3rd Avenue South 37064. The City of Franklin will make every reasonable effort to respond to written complaints from citizens or organizations within fifteen (15) working days after receipt. These responses will be made in writing.

Amendments:

Prior to the adoption of any substantial change in the proposed use of funds, citizens will be given reasonable notice of, and opportunity to comment on, the proposed amendment. Changes to the Consolidated Plan will not be considered as a substantial amendment unless the change results in the elimination of a category of activity for which funds have been allocated, the addition of a new category of activity not included in the Consolidated Plan, the elimination or addition of a targeted area of service, a change in the categories of beneficiaries or eligibility criteria, a substantial change in the method of distribution of funds as described in the Consolidated Plan or a change in the allocation priorities established by the Plan. Reasonable notice and a 30 day comment period will be required for all substantial amendments to the Consolidated Plan.

Performance and Evaluation Report:

The City of Franklin shall make efforts to notify citizens of the draft performance and evaluation report on the CDBG program and Consolidated Plan. Copies of the draft annual program report shall be made available to the public for a comment period of 15 calendar days. The final performance and evaluation report will include the results of the City of Franklin's process for consulting with residents and other affected parties on the implementation of the Consolidated Plan and a summary of the comments received on the draft report.

Scope of Participation for Community Development Block Grant Program

The City of Franklin will provide a continuing opportunity for citizen involvement in decisions related to the CDBG Program. Citizens will be assisted in the development of community development plans, identification and setting of priorities at called meetings and public hearings. Requirements for citizen participation by stage of application process:

Application Stage. Prior to the submission of the full application; the City of Franklin shall:

- (a) Assure that citizen participation has taken place with regard to the determination of priorities and community development and housing needs;
- (b) Provide adequate notices of public hearings; and
- (c) Hold hearings on the proposed application before adoption.

Post Approval Stage. Following the approval of its application, the City of Franklin shall:

Meeting Notices:

Notices regarding the two required public hearings will be published in two newspapers ten to fourteen days prior to the public hearing dates. These notices will be published as a display advertisement in a non-legal section of the daily newspaper and as a display advertisement in a weekly newspaper. Notices will also be distributed to the Citizen Advisory Committees, public housing Resident Associations, and other active groups and interested parties. Meetings will also be listed in the Calendar section of the City of Franklin website (www.Franklin-qov.com). More specific information regarding the distribution of information to various interested parties is contained below in the section that discusses specific actions for the CDBG program.

Publishing the Consolidated Plan:

The proposed Consolidated Plan will be published and made available for public review and comment prior to the second public hearing. A summary of the proposed Consolidated Plan will be published in at least two local newspapers and posted on the City of Franklin's website. The published notice will contain a summary which describes the general contents and purpose of the Consolidated Plan and will include a list of locations where copies of the entire Consolidated Plan may be examined. The Consolidated Plan will be provided in alternate forms, such as tape recorded, or in Braille, upon request.

Public Comments:

Citizens will have a period of not less than 30 days to review the proposed Consolidated Plan and make comments prior to its submission to the U.S. Department of Housing and Urban Development. All views of citizens, public agencies and other interested parties will be considered as the final submission is prepared. A summary of any comments received will be attached to the final submission. This summary will include a written explanation of comments not adopted and the reasons why these comments were not adopted. Such a summary will also be attached to the annual performance report and substantial amendments to the Consolidated Plan. The comment period for the annual performance report will be no less than 15 days.

- (a) Assure citizen participation when considering subsequent amendments to the CDBG program; and
- (b) Provide for citizen participation in the planning, implementation and assessment of the CDBG program including the development of the Grantee Performance Report and the submission of comments to the City of Franklin.

Application Development. Citizen involvement in the development of the Consolidated Plan includes assisting in the identification of community needs and the setting of priorities.

Program Implementation. Citizens shall be given the opportunity to provide advice and comment on policy decisions at appropriate times during all phases of the program development and implementation. This will be accomplished through the Citizen Commission with the technical assistance from the CDBG administrators. Utilization of community resources through the process will be encouraged.

Summary of Citizen Participation Comments

Public Hearing March 8, 2011 (3 attendees)

1. Ron Crutcher: I am please with the allocations; however, I would like to see more emphasis on neighborhood improvements particularly sidewalks that will allow citizens a safe place to walk. Have a line item for sidewalks in a future year; perhaps supplement CDBG funds with City funds.
Mary Ann Dotson: Find a stronger way to leverage funds.
Response: CDBG is a good leveraging tool; rehab is tough to leverage. It is harder to create loans with rehab dollars.
3. Daryl Hill: I agree with the allocations. Would we get better leverage is we just used funds for acquisition? Maybe taking the funds and acquire vacant land.
Response: Yes, but do have to guard against acquiring property and then it not being developed for various reasons.

Comprehensive Modernization of Public Housing

Regulations regarding public housing resident participation in the development of a five-year Comprehensive Modernization Plan for Franklin's public housing developments are contained in HUD Handbook No. 7485. The Franklin Public Housing Authority follows all regulatory procedures.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Program Year 3 Action Plan Institutional Structure response:

Institutional Structure for the Delivery of Consolidated Plan Programs

City government in Franklin plays a major role in providing the services and the functions that are needed in a dynamic and growing community. Franklin provides a similar package of services as other cities of its size (education, parks, streets, water and sewer, social services, etc.) and has considerable flexibility in determining what functions it will undertake and at what level. Through the local system of government, Franklin provides a blend of services that best serve the needs of its residents of the metropolitan area. From an administrative standpoint within the City, the delivery of Consolidated Plan programs was detailed in the General Section of this plan under the response to Managing the Process.

The City delivers the funds through a Request for Proposals (RFP) process and/or by designating experienced and qualified subrecipients. Advertisement of RFPs are done in a similar fashion to the advertisement and outreach process associated with the preparation of the Consolidated Plan, and in accordance with all applicable HUD, federal, state, and local law. The City also provides a level of training to potential users/applicants, both before and after they may receive funds, to familiarize them with the applicable rules and regulations of the CDBG program, and to help ensure quality applications.

Franklin takes great pride in being a City that builds strong partnerships and enduring collaborations with public, private, and non-profit entities. The delivery system for the Consolidated Plan programs relies on these existing and on new relationships. Many of the agencies and organizations listed in the prior consultation section of this plan, are included in this process and invited to apply where appropriate, based on their expertise.

Strengths and Gaps in the Delivery System

There are no readily identifiable gaps in how those programs are delivered. However, as the activities of the CDBG program continue to expand, the limited amount of administrative funds due to the limited amount of the grant could potentially impact the efficiency of the system.

Public Housing Delivery System

The Franklin Housing Authority is governed by a five-member Board of Commissioners appointed by the Mayor of Franklin. Commissioners serve for five-year terms, with terms staggered so that one expires each year. The Board maintains decision-making participation by its residents by having a current resident of the FHA on the Board. The Chairman of the Board of Commissioners is elected by the Board. FHA does its own hiring, contracting, and procurement with its own internal procedures and policies that meet or exceed HUD standards. FHA receives no funding from the City for services or housing support. When demolishing, building, or rehabilitating FHA structures, the agency is required to abide by all applicable City building code, design, and permitting procedures and rules.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 3 Action Plan Monitoring response:

Monitoring Standards and Procedures

Once HUD has approved the Consolidated Plan and Franklin receives its allocation of Community Development Block Grant funds, and the City has procured the delivery of CDBG programs (as outlined above), contracts and/or agreements with all agencies receiving funding are prepared. Those agreements specify the sub-grantees and the jurisdiction's obligations to ensure program compliance. City staff, prior to issuing payment for any goods or services, verify through invoices and backup source documentation that the good or service has been provided and that all program requirements have been met, and that the costs to be reimbursed are eligible expenses. Contracts with grantees specify the regularity of draws/payments and submission of periodic program status reports. An on-site monitoring visit, where required, is performed annually. Staff reviews and evaluates all of the submitted documentation, including the results of any on-site monitoring visits, to assess the sub-grantees performance.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 3 Action Plan Lead-based Paint response:

Estimation of Housing Units with Lead-Based Paint Hazards

Lead-based paint was eliminated from use in residential dwellings in 1978. Because of this, lead-based paint poisoning in housing units constructed before that time can be a potentially serious problem. This is particularly the case in geographic areas where there is a concentration of older homes that have not been renovated or mediated for the presence of lead-based paint. Although the median age of housing in Franklin at the time of the 2000 U.S. Census was less than twenty years (median year structure built = 1982), there are dwellings, particularly in the historic core, where lead-based paint continues to be present.

The vast majority of housing units in Franklin, 73% in 2000, have been constructed since 1979. This percentage has continued to increase in recent years as the City grows and more new housing units are brought on-line. Older historic homes have continued to be restored and largely mediated of lead-based paint in the process. Other older homes have been demolished. As the table below shows, nearly half of

the pre-1979 homes were constructed between 1970 and 1979. In the 2000 Census, only 550 units or 3.2% were constructed pre-World War II.

Franklin, Tennessee Total Housing Units 17,214 Source: 2000 Census Total Housing Units 21,691 Source: 3 Year ACS

Age of Housing Units	2000 Housing Units	3 Year ACS Housing Units
Built since 1980	12,562	17,392
Built 1970-1979	2,106	2,072
Built 1960-1969	892	784
Built 1950-1959	830	503
Built 1940-1949	274	307
Built 1939 or earlier	550	653

To estimate the numbers of extremely low, low, and moderate income households living in a structure of an age with a probability of lead-based paint being present, the table below assumes a percentage of the housing units proportional to their population. The actual number occupied by extremely low, low, and moderate income households could be arguably higher if those households occupy a disproportionate share of older homes.

Franklin, TN Estimated Lead Hazard in Low-Moderate Income Housing

Income Group	Total Households 2000	With Potential Lead Hazard 2000	Total Households 3 Year ACS	Potential lead Hazard 3 Year ACS
Extremely low-income <30% MFI	1,291	348	1,627	324
Low-Income 30-50% MFI	950	257	1,193	237
Moderate-Income 50-80% MFI	2,245	606	2,820	447
TOTAL Households	4,486	1,211	5,640	1,008

The 1,211 housing units occupied by extremely low to moderate income households that potentially could have a lead-based paint hazard represent 7% of the overall housing stock in Franklin. The estimated 1,008 units occupied in the ACS reporting period of 2006-2008 by similarly income households, which could have a lead-based paint hazard represent 4.7% of the overall housing stock at that time.

Lead-Based Paint Evaluation and Actions

The City of Franklin has a program to educate its residents on the hazards of lead-based paint and utilizing lead-safe work practices through its implementation of Consolidated Plan programs, particularly through the emergency rehabilitation

program. The City will also continue to work with the Williamson County Health Department and other interested organizations to evaluate lead-based paint hazards. Instances of lead-based paint poisoning and elevated blood levels in children will receive priority under Consolidated Plan rehabilitation programs that may be funded.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

Priorities and Specific Objectives

Objective 1: Continue Emergency Demonstration Rehabilitation Program

Goals: 10 projects annually.

Objective 2: Continue Community Based Development Organization Program

Goals: 1 project annually

Objective 3: Continue a Homeownership and Fair Housing Counseling Program.

Goal: Counsel 13 households in homeownership responsibilities.

Goal: Conduct Fair Housing education outreach program to residents, landlords, and the real estate industry

Objective 5: Acquire vacant property

Goal: Identify vacant property in strategic location for acquisition and development

Resources

Community Development Block Grant funding is the primary resource for completing Objectives 1, 3, and 5.

The City of Franklin and other subgrantees will seek to identify and leverage

of the above programs, and to support other associated community and economic development projects. The City of Franklin will investigate the availability of funds via the THDA or other mechanisms. Since becoming a CDBG entitlement community, the City has also qualified for an annual allocation of Emergency Shelter Grant funds through the State of Tennessee.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 3 Action Plan Public Housing Strategy response:

Needs of Public Housing

Please refer to the Franklin Housing Authority's Annual PHA Plan for more information on their operations and needs.

The Franklin Housing Authority manages 297 units of public housing. The current Franklin Housing Authority waiting list holds 71 applicants. The greatest demand is for one bedroom units, with 53% of their applicants being on that. Seven percent of their applicants are waiting for a 3 bedroom apartment. Three percent are on the four bedroom list, and 37% are waiting for a two bedroom apartment. The FHA does not have plans to expand its public housing stock. The Authority has established a minimum rent of \$50.

As outlined below in further detail, the Authority used the Capital Fund program to meet the physical and modernization needs of its units. The PHA Plan presents that program, which is summarized below for the upcoming years.

Public Housing Strategy

The Franklin Housing Authority's lease and all related policies comply with the requirements of the Quality Housing and Work Responsibility Act (QHWRA). Policies address deconcentration and income mixing, thereby encouraging higher income families in the developments. Although the FHA has provided incentives for higher income families, the majority of their applicants are from the extremely low income levels. All policies are reviewed on a regular basis.

Capital Fund Program

Funding under the Capital Fund Program is approximately \$487,000. The Authority's primary focus under the FY 2010 Annual Plan is to construct a new maintenance facility and to support its redevelopment activities.

Revitalization and Redevelopment

Over the next five years, it is the intent of the Franklin Housing Authority to demolish all 297 units of public housing and to redevelop them with a mixed income approach. FHA intends to use their 56+ acres to rebuild 308 public housing units. FHA has hired a master developer to assist in putting together a master plan for transforming Franklin's public housing. The plan is to rebuild back 308 units of public housing as well as to create more affordable, workforce housing, and homeownership opportunities. FHA will seek to purchase property off-site for replacement housing. No demolition will occur until such time that replacement housing is deemed obtainable.

Homeownership and Resident Involvement

The Franklin Housing Authority encourages its residents to enter paths toward self-sufficiency. Preferences exist for families working or engaging in training or education programs for non-housing programs operated or coordinated by the Authority. Although the Authority has no current homeownership program, they encourage their residents to pursue that dream and as mentioned in the previous section are hoping to include a homeownership component in the redevelopment of their property. The Authority also works with outside and/or resident organizations for the provision of crime and drug prevention activities, as well as **activities targeted to at-risk youth, adults, and seniors.**

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 3 Action Plan Barriers to Affordable Housing response:

Barriers to Affordable Housing

Barriers to Affordable Housing
Public regulatory policies such as zoning ordinances and subdivision regulations can directly or indirectly affect affordability by controlling supplies of residential land, the intensity and character of its use, and many of the costs in developing, owning, and renting housing. The City of Franklin does not consider public development policies and regulations to be major barriers to the provision of affordable housing. During the creation of land development policies, the City takes into account their impacts on all its citizens.

The major barriers to development of affordable housing in Franklin are more private sector oriented: the market value and cost of land in a growing, relatively affluent area with above average personal incomes; the increasing cost of materials and labor, particularly in a local economy with significant construction activity; and an inevitable element of "nimbysism."

Barriers to Fair Housing

The City of Franklin has been and continues to be very committed to ensuring that the residents of Franklin are aware of the laws that govern fair housing both on a local and federal level. The City has funded a Fair Housing Counseling program with CDBG funds, and works to educate its residents about the shortsightedness of

"nimbysism" and the need to meet the diverse housing requirements of a growingly diverse community.

Strategy to Address Any Public Policy Barriers

In January 2008, the Franklin Board of Mayor and Alderman appointed an Affordable Housing Committee charged with facilitating affordable housing development in the City. In January 2011, that Committee was replaced through adoption of an ordinance creating an Affordable Housing Commission and appointment of those members, many of whom also served on the aforementioned Committee. One of the first acts of this committee was to create a Process Subcommittee to identify barriers to affordable housing and recommend actions to address those barriers. Although this is an ongoing planning initiative, the Process Committee has identified the barriers listed in the box to the right:

high building impact, and tap fees; land cost and availability; zoning ordinance approval process; lack of incentives in the zoning ordinance; lack of education of why affordable housing is important; lack of "clean" property titles; high rental rates; limited areas for redevelopment, and; not-in-my-backyard attitudes.

The work of the Process Committee on barriers to affordable housing strategizes how to remove or mitigate the impact of these barriers on the development of affordable housing. That work has already resulted in the adoption of a new section of the Zoning Ordinance dealing exclusively with affordable and workforce housing. The section defines common affordable housing terms and as a first step, exempts building permit and plan review fees for affordable housing projects developed by non-profit housing organizations. Perhaps more importantly, by incorporating affordable housing as a section of the City's zoning code, the institutional structure is in place for future codified initiatives. Other public strategies have included development of a "Water and Wastewater System Development and Access Fee Incentive Program" used to establish an Affordable and Workforce Housing Reserve Fund; and a Affordable and Workforce Housing Round-Up Ordinance whereby citizens can voluntarily round-up their monthly water utility bills to the next highest dollar. Additionally, the Process Committee is working with the City on another longer term initiative that would address barriers in a very substantive way: a moderately priced inclusionary dwelling unit ordinance that would promote mixed-income housing developments.

In addition, the City of Franklin Land Use Plan states the following about one of its guiding principles: housing diversity.

Housing Diversity

The City of Franklin has a diverse population that has diverse housing needs. Young couples, established professionals with families, moderate-income families, single-parent households, single residents, empty nesters and senior citizens are all segments of the population with unique needs. These needs should be planned for. At the same time, the city recognizes that the most significant personal investment that many people have is in their home, and the city desires to help protect that investment by continuing to demand high-quality housing. Specifically:

1. The city will encourage a diversity of housing options. While a diverse mix of housing need not be provided in each new subdivision, an overall mix of densities and housing types should be developed.
2. The city will continue to implement design standards and other regulations that require high-quality housing.

The Land Use Plan states that attached residential dwellings are appropriate within approximately half of the special areas throughout the City. The City has recently adopted a new "Inclusionary Housing Ordinance" designed to increase the amount of affordable housing stock within the city. In exchange for an increase in density for their development, a builder or developer may choose to construct new affordable housing, purchase and rehabilitate existing housing, or pay a fee to the Affordable Housing Reserve established by the City to support Affordable Housing efforts.

HOME/ American Dream Down payment Initiative (ADDI)

1. Describe other forms of investment not described in § 92.205(b).
2. If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.
3. If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
 - a. Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
 - b. Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
 - c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
 - d. Specify the required period of affordability, whether it is the minimum 15 years or longer.
 - e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
 - f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
4. If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
 - a. Describe the planned use of the ADDI funds.

- b. Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
- c. Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

Program Year 3 Action Plan HOME/ADDI response:

The City of Franklin is not a participating jurisdiction in the HOME program and does not receive an allocation of HOME or ADDI funds.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

Program Year 3 Action Plan Special Needs response:

Homeless Needs Response

While not a major problem in the City of Franklin, the issue of homelessness still exists. Homeless persons and families seem to come from a variety of social

circumstances. There are persons and families stranded from travel along the interstate system, persons and families that have been evicted from existing rental arrangements, and families and persons escaping domestic violence or other social issues. Suggesting to persons and families in these trying situations that they need to go to a shelter or service provider in Nashville is not a satisfactory resolution.

City officials and community volunteers conducted a "pilot" point-in-time count during a night in January 2008. This pilot count was a good trial run and much was learned about the mechanics of doing a count: recruiting volunteers, developing easy to use counting forms, covering the geographic areas of the City, and reporting the findings. In addition, the City recruited agency volunteers and required City departments to maintain a log of homeless encounters during the entire month of January 2008. The point-in-time count was repeated in January 2009, 2010, 2011 most recently in 2012.

The City of Franklin or organizations based in Franklin have not participated in a Continuum of Care until quite recently. The Continuum of Care that includes Franklin services over 20 Tennessee counties with a current projected pro rata share of \$930,000. [The data contained in the Continuum of Care Homeless Table that is part of this Consolidated Plan was estimated by taking the percentage of the City of Franklin 2000 Census population to the total population of the eight counties (Cheatham, Dickson, Montgomery, Robertson, Sumner, Trousdale, Wilson, and Williamson) comprising the Mid Cumberland Continuum of Care and applying that percentage to the total count of homeless persons and homeless subpopulations contained in the CoC 2005 Homeless Populations and Subpopulations and Housing Activity Chart Reports.]

Homeless Objectives

Objective 4: Identify and fund homeless prevention programs
 Goals: Improve the condition, capacity, or availability of homeless shelters

Resources

Objective 4 will be completed with a combination of CDBG funds, private funds of the shelter on-hand, applied for, borrowed, and/or donated and other public funds or in-kind contributions as may be available.

The City of Franklin and other subgrantees will seek to identify and leverage additional funds during the five year planning period to expand the scope and goals of the above programs, and to support other associated community and economic development projects. The City of Franklin will investigate the availability of funds via the THDA or other mechanisms. Since becoming a CDBG entitlement community, the City has also qualified for an annual allocation of Emergency Shelter Grant funds through the State of Tennessee.

Plan for Meeting the Consolidated Planning and CPMP Tool Requirements

The City of Franklin believes this reasoned and planned approach to understanding homelessness with the City will enable the City to develop a strategy to address homelessness in the jurisdiction that is based on as reliable and accurate data and information as possible.

At this point in the development of services for homeless persons in the City of Franklin, focus is on working with the few existing providers to get persons in danger of or that are experiencing homelessness into the service system. As mentioned previously, receiving Emergency Shelter Grant funds through the State is an important step forward in this effort. The new Emergency Shelter Grant funds received from the State and allocated to agencies servicing domestic violence victims and at risk teens directly addresses two groups of persons who otherwise would be likely candidates for recurring episodes of homelessness.

The City also works with two local non-profit organizations on several initiatives that help prevent homelessness. Through the efforts of one agency, funding is available to provide emergency housing, during which time efforts are made to find more stable living arrangements. Transportation may also be provided to Nashville shelters where a larger array of services and resources are available. The City also works closely with a local housing counseling agency and staff serves on a task force formed by that group to address the foreclosure crisis. The counseling agency is a THDA certified foreclosure counselor and is working with in-trouble homeowners to keep their homes or in a worst-case scenario, find suitable alternative living arrangements.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

Program Year 3 Action Plan ESG response:

The City of Franklin is not required to complete this section, it is for States only. The City does not directly receive ESG funds from the U.S. Department of Housing and Urban Development. ESG funds from the State of Tennessee were first received in Summer 2008 and the City anticipates continuing to receive State ESG funds as part of their small city entitlement program.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

- Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Program Year 3 Action Plan Community Development response:

Identification of Community Development Needs and Priorities

The City of Franklin believes that true community revitalization requires a coordinated set of strategies, including both housing and non-housing initiatives, to succeed. Rehabilitating and constructing housing units without improving the physical, social and economic environment in which they are located does not automatically revitalize neighborhoods. Attractive public spaces and infrastructure, as well as social and economic development activities geared to the individual, must be combined with decent, affordable housing to help ensure a strong community.

Non-housing community development needs were discussed in the process of developing the 2010-2015 Consolidated Plan, many of which are now and will continue to be addressed through existing programs and services. Among the needs cited by local residents and service providers was the need for infrastructure support of new affordable housing developments, the availability and affordability of land for workforce housing, and planning assistance for specific target areas and areas of potential redevelopment. These activities will be the initial priorities for non-housing community development needs under Franklin's Community Development Block Grant program.

Community Development Block Grant (CDBG) funds will be an important tool in providing non-housing community development activities as the program grows, and will be supplemented with local public and private-sector resources whenever feasible. These activities will be designed to:

- benefit eligible low- and moderate-income families;
- aid in the elimination of slums or blight and assist with community development needs which pose a serious and immediate threat to the health or welfare of the community.

As described in the section on geographic areas of significance at the beginning of this Consolidated Plan, the jurisdiction plans to target CDBG funds to two specific low- and moderate-income residential areas: Hard Bargain and Natchez. These areas are

Among the needs cited by local residents and service providers was the need for infrastructure support of new affordable housing developments, the availability and affordability of land for workforce housing, and planning assistance for specific target areas and areas of potential redevelopment.

selected because they are good candidates for effective and visible treatment within the scope of CDBG and local resources. In addition, there is often evidence of slum and blight, and a strong need for economic development among neighborhood residents and businesses.

Other community development needs, including in areas outside the two target neighborhoods, are important and may receive some CDBG funding in time. These needs will largely be funded from local government, private, and/or other sources. The majority of these needs are identified in the city's Capital Improvement Budget (CIB), generated from priorities set by City Departments and approved by the Board of Mayor and Aldermen. Such community development needs may include:

- senior centers,
- other neighborhood and public facilities,
- water and sewer (including flood drainage) improvements,
- other infrastructure improvements, such as streets and sidewalks
- some public services,
- historic preservation, and
- larger commercial/industrial assistance.

Public Facilities

Improving public facilities where they are substandard is important to creating a desirable residential environment and to remove barriers to and attract investment by homeowners, housing developers, and small businesses. Public facilities that have high visibility, such as parks and recreation facilities, particularly in target areas, will be assessed as early as possible with a goal of improving the livability and visual appearance of the areas. This is an important initial step in upgrading the image an area projects and convincing people that a neighborhood is being "turned around." Wherever possible, CDBG funds will be leveraged with other sources of private and public funds.

Public Improvements

Improving public infrastructure is also important to provide a desirable residential environment and to remove barriers to and attract investment by homeowners, housing developers, and small businesses. Public improvements that have high visibility, such as street improvements, sidewalks, and storm water drainage projects, particularly in target areas, will be assessed as early as possible with a goal of improving the visual appearance and physical functioning of an area. Wherever possible, CDBG funds will be leveraged with other sources of private and public funds.

Public Services

Housing affordability depends on one of two factors, the cost of housing and/or the ability to pay. Employment and training opportunities directly impact the ability to pay, thereby making housing more affordable and homeownership more viable. Other services such as homebuyer and financial counseling are also important, as are services which enable low to moderate income persons to become self-sufficient. Self-discipline, self-esteem, leadership, and team effort are all lessons that must be learned during youth. Initiatives that offer these opportunities to at-risk youth, particularly during after-school periods and in the summer, will be pursued. Wherever possible, CDBG funds will be leveraged with other sources of private and public funds. In addition, the capacity of community development staff will be

leveraged where appropriate with the capacity of other public and private agencies, and non-profit organizations to develop and manage public service projects.

Economic Development

Programs and activities aimed at maintaining or improving social and economic conditions are vital to the long-term future of the community. Particular emphasis will be placed on activities that benefit unemployed and underemployed residents, public actions necessary to stimulate selected economic activities, public investments which can most cost-effectively achieve objectives, and activities with long-term impacts on the neighborhood environment, housing demands, unemployment, tax revenues, and other key variables. Wherever possible, CDBG funds will be leveraged with other sources of private and public funds.

Obstacles to Meeting Non-Housing Community Development Needs

The major obstacles to meeting the non-housing community development needs identified in this section are funding and the competing housing needs. Obstacles related to the cost of acquiring land are also prominent, and have been discussed earlier in the section on housing needs.

Non-Housing Community Development Need Objectives

During the duration of the City of Franklin's 5-year Consolidated Plan, no CDBG funding is anticipated being allocated to non-housing community development needs. Should this change, objectives and accomplishments will be included in the appropriate annual update. The City has prioritized housing needs as the primary needs to be addressed by Consolidated Plan programming.

Antipoverty Strategy

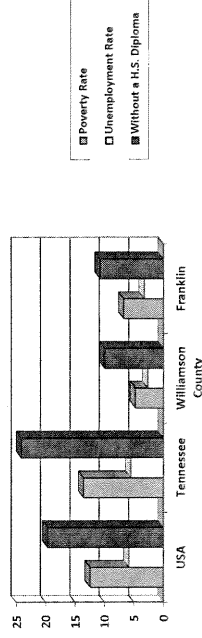
1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 3 Action Plan Antipoverty Strategy response:

Antipoverty Strategy

Although Williamson County, wherein the City of Franklin is located, has the designation of being the wealthiest place in the State of Tennessee, pockets of poverty do exist and their needs are prevalent, rising, and easily overlooked in an affluent and growing community.

The three indicators in the chart below illustrate that data related to poverty are quite similar in Williamson County and the City of Franklin, and show that both jurisdictions have proportionally fewer residents living in poverty and/or without a high school diploma or GED, and fewer persons aged 25 or older who are unemployed. U.S. Census data also shows that at the time of the last decennial census, only 1.6% of Franklin households, 257 households, were receiving public assistance income.



Source: 2000 Census

The table below shows poverty among the elderly and children, and for African-American and Hispanic or Latino persons. This table begins to point to subpopulations in Williamson County and the City of Franklin where anti-poverty strategies and initiatives are most warranted. The elderly have a poverty rate in Franklin (12%) nearly double the overall poverty rate (6.7%) and noticeably above the percentage of total elderly persons living in the City (7.5%). The percentage of elderly persons in poverty in Franklin also exceeds the percentage in the country at large. This reinforces earlier data presented in the Consolidated Plan showing significant housing cost burdens borne by the elderly, and the housing need priorities geared toward helping that population.

Poverty Rate	USA	Tennessee	Williamson County	City of Franklin
Total	12.4	13.5	4.7	6.7
Elderly	9.9	13.5	8.9	12.0
Children	16.6	18.0	5.6	8.0
African American	24.9	25.3	12.9	17.8
Hispanic or Latino	22.6	23.3	15.0	17.1

The African-American and Hispanic percentages in the above table represent over 1,000 persons in the City of Franklin. Although better than the percentages for the country at large, the relatively high percentages within the City point to a need for anti-poverty strategies targeting these minority groups and the City's historic African-American neighborhoods, including the Hard Bargain and Natchez neighborhoods identified as priority areas under the CDBG program.

The 3 Year ACS 2006-2008 provides a more detailed and updated picture of poverty in Franklin. There are a total of 3,027 persons with incomes below the poverty level. Since 2000, the poverty rate has improved to 5.5%, but the actual number of impoverished persons has increased due to overall population growth. Fifty-eight percent (58%) of persons living in poverty are White, 24% are Black/African American, and 18% are Hispanic. Poverty rates for the elderly and children are 6.4% and 8.5% respectively. Compared to 2000, approximately the same percentage of children is impoverished, while the poverty rate of elderly persons has nearly halved. It is interesting to note that of the 1,223 persons below the poverty level who were part of the labor force (aged 16 and over), 1,012 (83%) are employed. The table below shows poverty status by family type, which clearly

demonstrates that poverty is a significant and disproportionate issue for female-headed households, particularly those with children.

Poverty by Family Type	Total	With Child <18	With Child <5 only
All families	595 (4.1%)	412 (5.6%)	7 (1.7%)
Married couples	222 (1.9%)	121 (2.1%)	0 (0.0%)
Female-head families	383 (18.2%)	259 (21.9%)	53 (20.3%)

The City of Franklin is committed to focusing the benefits of the Community Development Block Grant program with leveraged funds and services from other public, private, and non-profit sources, on its low to moderate income citizens and their neighborhoods, including those with incomes below the poverty level. Housing activities will serve to stabilize and enhance what is most often the largest investment and financial asset of low to moderate income families, their home. Owning a home in Franklin, especially in light of its growing economy and increasing personal incomes, is, outside of employment, the quickest and surest method of building household wealth.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 3 Action Plan Specific Objectives response:

Special Need Objectives

Prior sections of the Consolidated Plan have responded to the needs of and strategies for assisting elderly headed households. Other non-homeless special needs are proposed to be addressed and strategized for similarly to the plan for responding to homelessness. Special Need populations, such as the disabled, HIV/AIDS, and mentally ill, will be included as part of the Homeless Needs and Social Service Assessment.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.
2. Report on the actions taken during the year that addressed the special needs of

persons who are not homeless but require supportive housing, and assistance for persons who are homeless.

3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.
6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.
7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.
8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.
9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 3 Action Plan HOPWA response:

The City of Franklin does not receive HOPWA funds.

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

Program Year 3 Specific HOPWA Objectives response:

The City of Franklin does not receive HOPWA funds.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Fair Housing

The City of Franklin has an Analysis of Impediments (AI) to Fair Housing Choice study. An "impediment" to fair housing choice is defined as actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice or any actions, omissions, or decisions that have this effect. There are several primary reasons behind the City undertaking an AI, including:

- The City realizes the importance of having housing choice for its residents and consequently the importance of removing impediments to housing retention, development and use by all citizens;
- The City has an appointed Affordable and Workforce Housing Advisory Committee, now a formal Affordable Housing Commission, to the Board of Mayor and Aldermen and a Fair Housing Committee that understands the connection between affirmatively furthering fair housing choice and promoting affordable/workforce housing;
- The City was awarded Community Development Block Grant (CDBG) entitlement status by the U.S. Department of Housing and Urban Development.

The City's Interim Housing Coordinator role is specifically responsible for partnering with the community, staff, various committees and public and private organizations in order to serve as the City's point of contact for all affordable housing development and fair housing choice initiatives and programs. The Interim Housing Coordinator also participates as a member of the Fair Housing Committee and the Affordable/Workforce Housing Advisory Committee to the Board of Mayor and Aldermen.

This current version of the AI was prepared by the City of Franklin's Housing Development Coordinator following review of the Fair Housing Planning Guide Book and the Fair Housing Plan: Procedures for Mapping Analysis of Impediments. Input from residents, public and private service providers and citizens knowledgeable of the community contributed significantly to other data sources for identification of the Impediments to Fair Housing Choice and the actions designed to address those Impediments.

Impediments identified and addressed by actions in the AI are as follows:

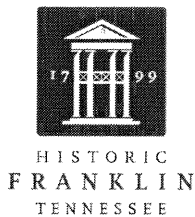
- LACK OF AFFORDABLE HOUSING CHOICE
- LACK OF AWARENESS AND UNDERSTANDING OF FAIR HOUSING LAWS
- LACK OF OUTREACH AND EDUCATION TO THE COMMUNITY CONCERNING FAIR HOUSING
- LACK OF A PLAN AND FORMAL PROCESS FOR ADDRESSING FAIR HOUSING ISSUES ON AN ONGOING BASIS

A summary of the analysis considered in determining the Impediments, as well as Twenty-one (21) specific actions developed to address each of the above Impediments, are discussed in detail in Section IV of the Analysis of Impediments document.

Actions Implemented and Discussed in More Detail in Section V of the AI:

- Fair Housing Choice Ordinance
- Barrier Free Construction Ordinance
- Affordable and Workforce Housing Round-up Ordinance & Program
- CDBG Allocations for Fair Housing Training
- Annual Housing Fair
- Foreclosure Task Force
- TNHousingSearch.org
- City Staff Training & Conference Participation
- Uniform Residential Landlord and Tenant Act Training

The Analysis of Impediments and the Consolidated Planning actions and goals will be worked in concert with the objective to continually improve the effectiveness of our collective efforts in the community to Affirmatively Further Fair Housing Choice.



MEMORANDUM

April 10, 2012

To: Board of Mayor and Alderman

From: Eric Stuckey, City Administrator
Vernon Gerth, ACA-Community & Economic Development
Kathleen Sauseda, Interim Housing Development Coordinator

Subject: Resolution 2012-22 to Approve the CDBG Annual Action Plan

Purpose

The purpose of Resolution 2012-22 is to approve the programming and allocation for the City's CDBG Annual Action Plan. This Action Plan is for the 2012-13 program year which is year three of the City's five-year Department of Housing and Urban Development approved Consolidated Plan.

Background

The City of Franklin has identified affordable housing development as an important issue in the community. The mission of the Community Development Block Grant program in Franklin is to develop, in cooperation with its residents, business partners, and not-for-profit housing agencies, viable neighborhoods by providing and maintaining decent housing and a suitable living environment for low and moderate-income persons.

The Department of Housing and Urban Development requires entitlement cities to develop and submit an Annual Action Plan reflecting the projections of the next fiscal year. Suggested programs for the year three Action Plan are similar to last year with the exception of adding a line item for acquisition of land for development of affordable/workforce housing. The City of Franklin is obligated to utilize CDBG funding in accordance with HUD guidelines.

Financial Impact

Programs and recipient contracts will be funded by the Community Development Block Grant entitlement the City receives annually. The entitlement for 2012-13 is \$227,180.

Recommendation

Staff, with input from the Housing Commission and the Public Hearing held on March 1, 2012 recommends approval of the following programs and allotment by percentage.

Emergency Rehab	48 %	\$ 108,810
Community Based Development Organization	15 %	34,076
Homeownership/Fair Housing Counseling	5 %	11,359
Homeless Programs	1 %	2,500
Acquisition	11 %	25,000
Administration	20 %	45,435
Total (anticipated \$227,180 entitlement)	100 %	\$ 227,180