



5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

GENERAL

Executive Summary

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

5 Year Strategic 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 first year funding under the new Consolidated Plan will be approximately \$275,000 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 2009 the area median income for a family of four was \$64,900. Eighty percent of this amount is \$51,900. For a two person household, 80 percent of the median income is \$41,500. 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: 15 projects annually.

Objective 2: Identify and fund a Community Based Development Organization(s) (CBDO) to either complete an acquisition/rehabilitation for sale or new construction of a homeowner unit

Goal: 1 project (with a priority of projects in Hard Bargain and/or Natchez) in the first year of the consolidated planning period.

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

Goal: Counsel 15 households in homeownership responsibilities.

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

Resources

Community Development Block Grant funding is the primary resource for completing Objectives 1 and 3. Objective 2 will be completed with a combination of CDBG funds, private funds of the CBDO(s) on-hand, applied for, or borrowed, and other public funds or in-kind contributions, which could include land, as may be available.

The City of Franklin, the selected CBDO(s), 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.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic 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'Overture 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 (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private 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 the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

3-5 Year Strategic 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, and Community Relations. City Administration staff includes three Assistant City Administrators who oversee three service areas (Public Works, Finance/Administration, and Community Development), and the Parks Department, the Policy and Fire Departments. 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 (91.200 (b))

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.

3-5 Year Strategic Plan Citizen Participation response:

Citizen Participation Plan

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 Department of Building and Neighborhood Services 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 Housing Development Coordinator, Department of Building and Neighborhood Services at (615) 550-6649.

Citizen Advisory Committee:

In order to hear from those persons most likely to be affected, a Citizen Advisory Committee has been established to provide advice and consultation on the preparation, development and evaluation of housing and community development activities contained in the Consolidated Plan. This CAC will include representatives from any targeted investment areas that may be established, members of public housing resident associations, and other lower income persons. The focus of the committee is on hearing from potential recipients of service rather than administrators. Once established, the Consolidated Plan CAC will be asked to meet a minimum of two times each year. CAC meetings will be held at a time and place that is convenient to the members and will be open 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 CAC 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/cdbg.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) 550-6649. 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, Department of Building and Neighborhood Services, 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 to 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:

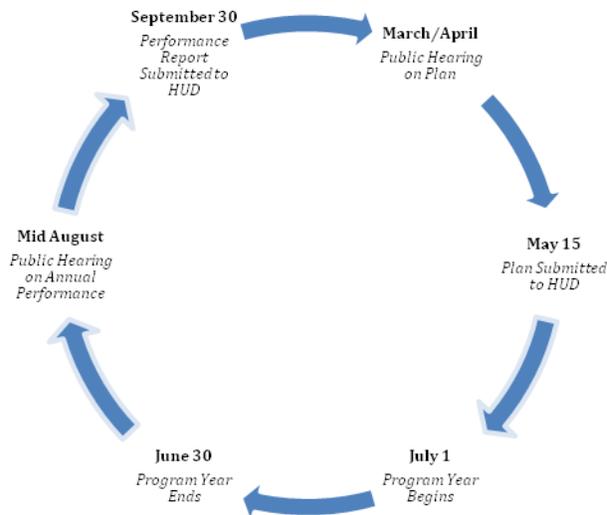
- to obtain the view of citizens, public agencies and other interested parties regarding the identification of housing and community development needs within the City of Franklin
- to respond to proposals and comments received from citizens; and
- to review program performance for the previous program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



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-gov.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

The Consolidated Plan is developed and evaluated during a yearlong planning process that relies on a series of informal and formal citizen meetings and public hearings. The process is dynamic and allows multiple opportunities for change.

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.

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 Housing Development Coordinator, Department of Building and Neighborhood Services, City Hall, 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:

- (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 Advisory Committee 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 22, 2010 (___ attendees)

1.

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 (91.215 (i))

1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.
2. Assess the strengths and gaps in the delivery system.
3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and

procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

3-5 Year Strategic 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, through the Department of Building and Neighborhood Services, or their designees, deliver 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 (91.230)

1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic 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.

Priority Needs Analysis and Strategies (91.215 (a))

1. Describe the basis for assigning the priority given to each category of priority needs.
2. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

Please refer to the Housing Needs, Priority Housing Needs, Non-Housing Community Development Needs, Homeless Plan, and Specific Special Needs sections of this Consolidated Plan.

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.
2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into

housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

3-5 Year Strategic 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	With Potential lead Hazard 3 Year ACS
Extremely low-income <30% MFI	1,291	348	1,627	324
Low-Income	950	257	1,193	237

30-50% MFI				
Moderate-Income	2,245	606	2,820	447
50-80% MFI				
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

Housing Needs (91.205)

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

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).
2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

3-5 Year Strategic Plan Housing Needs response:

Discussion of Estimated Housing Needs

As required by the Consolidated Plan, information presented in this section is based on data from the 2000 U.S. Census.

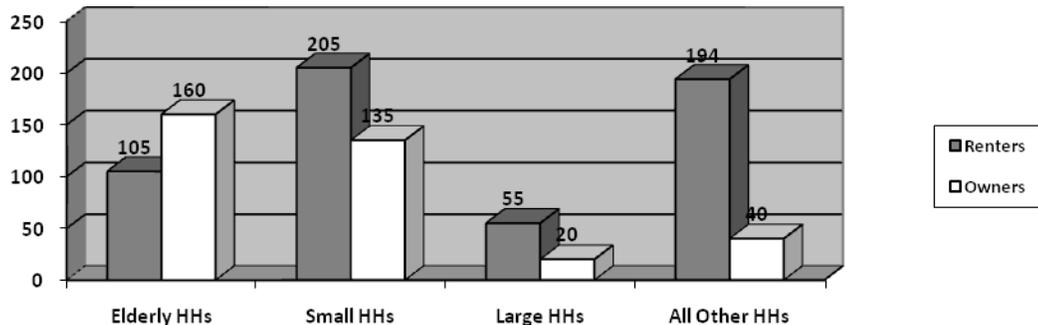
Extremely Low Income Persons and Households

Franklin has a total of 1,291 households with extremely low incomes. Extremely low income is defined as households with gross incomes below 30% of the Median Family Income for the Metropolitan Statistical Area (MSA). The 1,291 extremely low income households represent slightly over 8% of the total number of households in the City of Franklin. Nearly 60% of these households are renters, while approximately 40% are homeowners. The table below illustrates the problem of cost burden borne by renters and owners in this income category.

HHs Cost Burdened	Renters	Owners	TOTAL
Cost Burden >30%	559 (73.3%)	355 (67%)	914 (71%)
Cost Burden >50%	489 (64.1%)	285 (54%)	774 (60%)

The relatively high percentages of households with cost burdens exceeding 50% point to potentially serious individual and community issues. It is apparent that extremely low income households, whether renter or owner, are paying considerably more in rent than they can reasonably afford.

The following chart shows the breakdown of extremely low income persons experiencing a housing problem by household type. Housing problems may be a cost burden, substandard housing unit, or overcrowding. Elderly households are households where a member of the household is 65 or older; small related households are households with 2 to 4 members; large related households are households with 5 or more members; and all other households are single persons and other types of arrangements.



The chart clearly shows that the number of large households with a cost burden or other housing problem is considerably less than the numbers of other household types. The chart also shows that extremely low income elderly homeowners are experiencing housing problems disproportionately to homeowners of other housing types. For the other three housing types, renters, particularly small households and single non-elderly households, are more likely to experience a housing problem.

Low Income Persons and Households

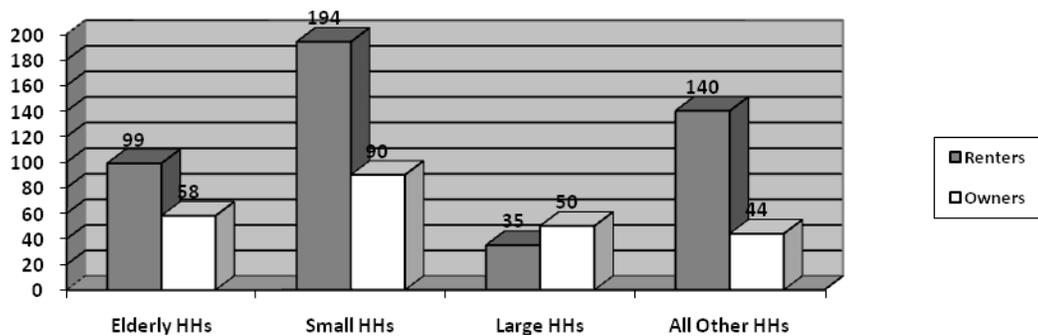
Franklin has a total of 950 households with low incomes. Low income is defined as households with gross incomes greater than 30% to less than or equal to 50% of the Median Family Income for the Metropolitan Statistical Area (MSA). The 950 extremely low income households represent nearly 6% of the total number of

households in the City of Franklin. Approximately 58% of these households are renters and 42% homeowners. The table below illustrates the problem of cost burden borne by renters and owners in this income category.

HHs Cost Burdened	Renters	Owners	TOTAL
Cost Burden >30%	454 (83%)	222 (55%)	676 (71%)
Cost Burden >50%	224 (41%)	170 (42%)	394 (41%)

As might be expected by their relatively higher incomes, households in the low income category that are cost burdened are fewer in number than in the previously discussed extremely low income category. For renters, there are also more households with a cost burden between 30 and 50% than over 50%, suggesting more cost effective responses to help their situation.

The following chart shows the breakdown of low income persons experiencing a housing problem by household type. Housing problems may be a cost burden, substandard housing unit, or overcrowding. Elderly households are households where a member of the household is 65 or older; small related households are households with 2 to 4 members; large related households are households with 5 or more members; and all other households are single persons and other types of arrangements.



The chart clearly shows that the number of large households with a cost burden or other housing problem is less than the numbers of other household types. The chart also shows that more low income elderly and small household homeowners are experiencing housing problems than homeowners of other housing types. Small two to four person renter households are the most numerous low income households experiencing housing problems.

Moderate Income Persons and Households

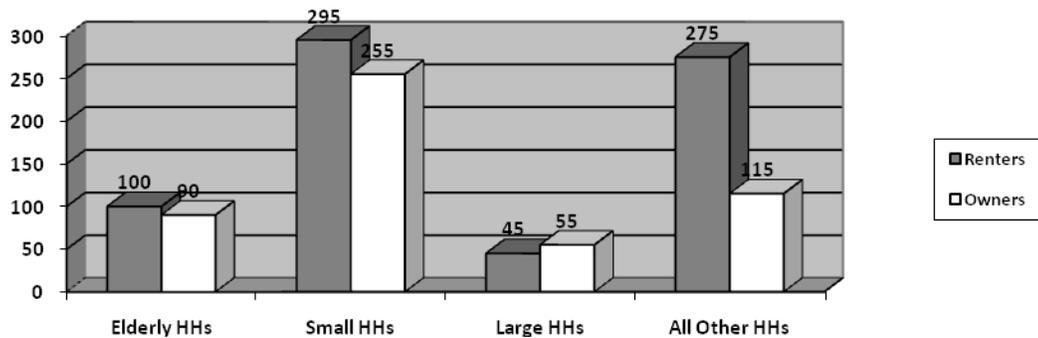
Franklin has a total of 2,245 households with moderate incomes, more than the number of extremely low income and low income households combined. Moderate income is defined as households with gross incomes greater than 50% and equal to or lesser than 80% of the Median Family Income for the Metropolitan Statistical Area (MSA). The 2,245 moderate income households represent nearly 14% of the total number of households in the City of Franklin. Fifty-five (55)% of these households are renters, while approximately 45% are homeowners. The table below illustrates the problem of cost burden borne by renters and owners in this income category.

HHs Cost Burdened	Renters	Owners	TOTAL
Cost Burden >30% MFI	665 (53%)	515 (51%)	1180 (52%)

Cost Burden >50% MFI	65 (5%)	205 (20%)	270 (12%)
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The trend of lower percentages of households with excessive cost burdens greater than 50% continues with the moderate income group. The excessive cost burden among renters is minimal (5%). Unfortunately, the actual numbers of moderate income households with a cost burden between 30 and 50% is the largest among the three income groups, albeit the percentage of households affected is smaller than for the extremely low income group.

The following chart shows the breakdown of moderate income persons experiencing a housing problem by household type. Housing problems may be a cost burden, substandard housing unit, or overcrowding. Elderly households are households where a member of the household is 65 or older; small related households are households with 2 to 4 members; large related households are households with 5 or more members; and all other households are single persons and other types of arrangements.



The chart clearly shows that the number of large households and to lesser extent elderly households with a cost burden or other housing problem is considerably less than the numbers of other household types. For renters, the chart clearly shows that small and single non-elderly households are far more likely to experience housing problems. Among owners, small households experience noticeably more housing problems.

Special Needs Populations and Persons on the Public Housing Wait List

In addition to the elderly who are addressed above and the homeless who are discussed separately in the Consolidated Plan, there are other special need populations with housing problems, such as those with developmental and non-developmental disabilities, persons with AIDS or who are HIV positive, families in need of public housing, and the victims of domestic violence.

The Franklin Housing Authority manages 297 units of public housing. The Authority has established a minimum rent of \$50. The Franklin Housing Authority’s current waiting list holds approximately 71 applicants. Seven (7)% of the applicants need three bedroom units, 37% are waiting on two bedroom units, 53% need one bedroom apartments, and 3% are on the four bedroom list. There are no current plans to expand the stock of public housing in the City of Franklin.

Disproportional Housing Needs

The table below highlights disproportionate greater housing needs by race and

tenure (renter vs. owner-occupied). Disproportionate greater need is defined as instances where the housing problems of a particular category of race and tenure exceed that for the housing problems of all households by 10% or more. For example, the table shows that Hispanic renter households have a disproportionate need of 30.7%, or in other words, they are 30.7% more likely to have a housing problem than all households combined. Housing problem is defined as a substandard unit without complete kitchen and/or plumbing facilities, overcrowding, or a cost burden.

Households with Any Housing Problem by Race and Tenure (2000)

Race	Renter Occupied	Owner-Occupied	Total
White	34.8%	21.2%	25.7%
African American	36.3%	22.0%	29.2%
Hispanic	66.9%	31.4%	54.9%
Native American	NA	71.4%	71.4%
Asian	15.9%	25.3%	19.8%
Pacific Islander	NA	NA	NA
All Households	36.2%	21.7%	27.0%

The table shows that two populations have a disproportionately higher percentage of housing problems: Hispanic renters and Native American owner-occupants. A closer examination of the data for Hispanic renters shows that there a total of 311 Hispanic renter households in Franklin, 182 of which have low to moderate incomes, including 133 households with incomes less than or equal to 50% of the median family income (MFI). None of the households affected are elderly headed, almost all are family households with three or more members.

A closer examination of the data for Native American owner-occupants shows that there are 14 households in this category. Of these 14 households, the 10 households with low to moderate incomes all have extremely low incomes, 30% or less of the MFI. The household type on these households was not available.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.

Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

Priority Housing Needs

With the limited amount of Community Development Block Grant funds available to the City of Franklin, the priority needs that have been identified are:

- Assistance to extremely low and low income homeowners, particularly the elderly
- Assistance to moderate income homeowners
- Assistance to moderate income renters
- Assistance to extremely low and low income renters, particularly elderly and small households with higher cost burdens

Analysis of and Basis for Assigning Priority Housing Needs

Extremely Low and Low Income Homeowners

The housing need table and analysis of that data, combined with an assessment of Franklin's robust housing construction market, pointed to elderly and lower income homeowners as facing an often multitude of housing problems. Many of these households are on fixed incomes that are not rising commensurate with the costs of maintaining their existing housing units.

According to the CHAS data book, there are nearly 300 extremely to low income elderly homeowners in the City of Franklin. Because of their common fixed incomes, it is important to maintain their ability to remain in their current housing unit. The majority of these homeowners have housing cost burdens approaching or exceeding 50%. As a group, these homeowners would find the cost of new replacement housing even more burdensome.

Moderate Income Homeowners

Moderate income homeowners are a priority for many of the same reasons cited for the first priority group. In addition, of the three eligible income groups, they have the largest number of households with a housing problem, representing nearly 14% of all Franklin households. The moderate income group also has the largest number of homeowners with a housing problem. Consequently, assisting this group is important to meeting the needs and diversity of the larger community.

Assisting the group of moderate income homeowners is also more cost efficient, given the limited availability of community development resources. Their incomes are slightly higher to begin with, and cost burden data shows that the majority of households are in the over 30% range, with far fewer having excessive cost burdens over 50%. A minimal amount of assistance could have a major impact.

Moderate Income Renters

As noted above, of the three eligible income groups, households with moderate incomes are the largest. Moderate income renters is the largest subsection of that group, with 1,245 households. This is a category of households where potential new and first-time homeowners are found. The rents they are paying are often similar to what a mortgage payment would be for a comparably sized or larger housing unit. In Franklin, many of these households have increasing incomes, as opposed to fixed or stagnant incomes, making them good candidates for homeownership programs. Downpayment, closing cost, and counseling are services that can benefit this group.

Extremely Low and Low Income Renters

These households experience some of the highest rates of cost burden. Over 80% of low income small renter households experience a cost burden rate of over 30%. Over one of every two extremely low income elderly and small renter households have a cost burden in excess of 50%. The availability of affordable housing for these groups is tight in Franklin, with relatively few new units anticipated to come on line. In addition, the Franklin Housing Authority has a waiting list of approximately 25% their total number of units.

Obstacles to Meeting Underserved Needs

The major obstacle to meeting underserved needs is the lack of resources and funding. This obstacle extends across each income category and household type. Education regarding the need for affordable housing and workforce housing in Franklin is needed to overcome any misconceptions and negative perceptions about who it helps and the impact on neighboring development. Another obstacle is the lack of an affordable housing institutional infrastructure, particularly in the non-profit sector with its necessary role in development.

Housing Market Analysis (91.210)

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

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or abandoned buildings and whether units in these buildings are suitable for rehabilitation.
2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).
3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note, the goal of affordable housing is not met by beds in nursing homes.

3-5 Year Strategic Plan Housing Market Analysis responses:

Characteristics of the Housing Market

Supply of Housing

According to the 2000 Census, Franklin has 17,214 housing units. The overall vacancy rate is 6.5%, with a rental vacancy rate of 7.1% and homeowner vacancy rate of 4%. Sixty three (63%) of these units are owner-occupied, and 59% are single-family detached units and 5.9% are single-family attached units. The homeownership rate for households with incomes between 0 and 80% of the median family income is 42.9%. The table below shows much of this information in comparison to Williamson County and Tennessee.

Housing Characteristics	Tennessee	Williamson County	City of Franklin
Total Housing Units	2,439,443	47,005	17,214
Overall Vacancy Rate	8.5%	4.9%	6.5%
Single-Family Detached Units	67.3%	78.7%	59.2%
Homeownership Rate for All HHs	69.9%	81.5%	63.5%
Homeownership Rate for 0-80% MFI HHs	54.3%	62.5%	42.9%

In 2005 there were 906 new single-family privately-owned housing units authorized by permit in Franklin. These units represented 100% of the building permits for new privately-owned housing units. 2005 data show no permits were issued for new privately-owned multifamily housing units or for new privately owned housing units in structures with two or more units. The table below shows the percentage of housing units by number of units in a structure.

Housing Stock	Tennessee	Williamson County	City of Franklin
Single-Family Detached	67.3	78.7	59.2
Single-Family Attached	2.8	4	5.8
Structures with 2-4 Units	6.8	3	6.2
Structures with 5-9 Units	4.4	3.9	9.8
Structures with 10-19 Units	3.1	3.5	9.1
Structures with 20+ Units	4.3	2.8	7.4
Mobile Homes, Trailers, Other	11.2	4.1	2.5

The following information is based on estimates from the Census 3 Year American Community Survey (ACS) for the period from 2006 through 2008. The number of housing units has increased by over 26% to 21,691. Overall vacancy has declined to 4.9% from 6.5% in 2000. The percentage of single-family detached housing units has increased to over 63% and the homeownership rate has increased by 5% to 68.5% overall. The growth in the homeownership rate compared to the growth in overall housing units, from a general standpoint, indicates that upwards of 85% of the units added since 2000 are owner-occupied. This tracks with the 2005 building permit data indicating the dominance of single-family development versus multifamily development. The table below compares, by percentage, 2000 Census data to 3 Year ACS data for units within a structure. This table further illustrates the rapid growth in single-family housing units and the concurrent slow pace of new multifamily development. While nearly 4,200 single-family units have been added in the Franklin market, only 350 units of multifamily has been added.

Franklin Housing Stock	2000	2006-2008 ACS
Single-Family Detached	59.2	63.2
Single-Family Attached	5.8	7.6
TOTAL SINGLE FAMILY	65.0 <i>11,189 units</i>	70.8 <i>15,359 units</i>
Structures with 2-4 Units	6.2	4.3
Structures with 5-9 Units	9.8	7.3
Structures with 10-19 Units	9.1	7.4
Structures with 20+ Units	7.4	8.2
Mobile Homes, Trailers, Other	2.5	2.0
TOTAL MULTIFAMILY	35.0 <i>6,025 units</i>	29.4 <i>6,377 units</i>

Franklin’s housing stock is relatively large in size. The median number of rooms per housing unit is 6.6, with nearly 38% of units having 8 or more rooms. Seventy (70) percent of the housing units have 3 or more bedrooms, nearly one-third with 4 or more. On the other end of the spectrum only 8% of the housing units have 1 or fewer bedrooms, which are typically the most affordable housing units to non-family households (mostly singles) and married households with no children with limited incomes. One and two member households account for 58% of total households in Franklin: adding 2 bedroom units to those with 1 or fewer, still only yields 30% of the total housing units available.

Demand of Housing

In 2000, Franklin was home to 16,092 households with an average household size of 2.5. Household composition was evenly split between married couples with children under 18 (32.1%), family households without children under 18 (30.2%), and non-family households (30.2%). Only 7.5% of households were single-parent headed with children under 18. Nearly 18% of Franklin households had one or more persons 65 years of age or older, 7.2% of households were a person of that age living alone.

The following table shows changes in this data according to the 3 Year ACS 2006-2008. The number of households, similar to the number of housing units discussed in the previous section, increased by nearly 25% to 20,696.

Household Characteristics	2000	3 Year ACS
Households	16,092	20,626
Married with children <18	32.1%	28.1%
Families without children	30.2%	34.8%
Non-family households	30.2%	29.6%
Single parent with children <18	7.5%	7.6%
Households with elderly member	13.1%	17.8%
Households with children <18	40.7%	38.4%

This data indicates that Franklin households are aging, with a growing number of elderly residents living alone.

The table below, based on 2000 Census information, shows housing hardship by income strata, a more general view than discussed in the previous section. Notably, Franklin exceeds the cost burdens for both Tennessee and Williamson County. The incidence of overcrowding is small.

Housing Hardship	Tennessee	Williamson County	City of Franklin
Pct. HHs with incomes 0-80% of area median and >30% Cost Burden	47.1	54.9	61.7
Pct. HHs with incomes 0-80% of area median and >50% Cost Burden	23.3	29.4	32.1
Pct. Housing units that are overcrowded	2.7	1.4	2.5

Although not available by the above income categories, the 3 Year ACS does provide an updated view of cost burdened households. Overall, 26% of owners with a mortgage and 36% of renters are now cost burdened. The table below shows cost burden by income grouping for both owners and renters. As expected, cost burden decreases as incomes increase. However, clearly both owner and renter households with incomes less than \$50,000 are having difficulty finding affordable housing in Franklin, even 40% of owners with incomes between that and \$75,000 are cost burdened.

Income Group	All Owners	with Cost Burden	All Renters	with Cost Burden	Total % Cost Burden
<\$20,000	650	(76%) 494	572	(86%) 494	80.9%
\$20-\$34,999	961	(59%) 565	1,150	(76%) 871	68.0%
\$35-\$49,999	1,031	(36%) 367	1,540	(53%) 812	45.9%
\$50-\$74,999	2,316	(40%) 918	1,611	(5%) 78	25.4%
\$75,000+	9,154	(10%) 932	1,319	(1%) 13	9.0%

Cost burden is a factor of two things, housing cost and income. Median household income in 2000 was \$56,431 and unemployment was at a low rate of 3.2%. Less than 7% of households have incomes at or below the poverty rate. The poverty rate for children is 8% and for the elderly 12%. The median income of borrowers for owner-occupied housing in 2005 was \$84,000. Only 14.8 percent of those purchases were by lower income borrowers, who represent 28% of the total household population. A later section discusses the cost of housing in Franklin.

Income since 2000 has risen. The median household income according to the 3 year ACS 2006-2008 has increased to \$76,332 and unemployment has not changed. It is worth noting, that the last ACS data is over two years old, so the unemployment rate may very well be rising. The poverty rate has fallen to 5.5%, while it is important to recognize that the actual number of those impoverished has slightly risen from 2,922 to 2,998. The poverty rate for children is now 8.5% and for the elderly 6.4%.

Condition of Housing

The median year a housing structure was built in Franklin is 1992. Comparing this to 1975 for the State of Tennessee and 1987 for Williamson County illustrates Franklin’s attraction for new residential construction. As discussed in the section on lead-based paint, in 2000 approximately three-quarters of Franklin’s housing units have been constructed since 1979 and nearly 65% have been constructed since 1990. With the growth in new housing units since 2000, the 3 Year ACS 2006-2008 show the percentage of units built since 1979 has increased to nearly 90%.

2000 U.S. Census data shows that only 37 of the 17,214 housing units in Franklin lacked complete plumbing facilities, and only 171 lacked complete kitchen facilities. The 3 Year ACS 2006-2008 shows the number of units lacking complete plumbing facilities has remained virtually unchanged, but the number lacking complete kitchen facilities has increased to 212. The increase in the latter is potentially indicative of a worsening of some of the older housing stock. However, the newness of housing in Franklin strongly suggests a good overall condition of housing, permitting the targeting of rehabilitation assistance to the City’s older historic neighborhoods.

Cost of Housing

The 2000 median gross rent in Franklin was \$758, with an average rent of \$796. The median value of owner-occupied housing units was \$184,500, with an average value of \$198,782. With a median household income of \$56,000, the median rent of \$758 was not an affordability mismatch, assuming the standard of 30% of income for housing costs; although, data presented earlier shows over 2500 renters had some type of housing problem, mostly cost burdens. However, the typical Franklin home for purchase was becoming unaffordable to the typical Franklin household. The dream, security, and wealth building of homeownership were extra difficult for Franklin households with incomes less than 80% of the median income.

Cost of Housing	Tennessee	Williamson County	City of Franklin
Median Gross Rent	\$505	\$744	\$758
Median Value of Owner-Occupied Units	\$93,000	\$208,400	184,500
Median Loan Amount for Purchase (2005)	\$100,000	\$190,000	\$176,000

The 3 Year ACS 2006-2009 provides an updated picture of housing costs for both owners and renters. The median gross rent is now \$1,044. The median value of owner-occupied housing is \$307,777 with a median monthly owner cost of \$1,876. The story of affordability for the median income family remains much the same as in 2000, the median household income can afford the median rent, but the median valued house is unaffordable to that same household without voluntarily assuming a significant cost burden.

The tables below show the value of owner-occupied housing in Franklin and how much families are paying monthly in mortgage and rent. Over one-half, 52%, of owner-occupied housing is valued \$300,000 or more, while only 9% is valued less than \$150,000. Not coincidentally, nearly three out of four owner households with mortgages are paying more than \$1500 each month for housing costs, while only 7% of those pay less than \$1000 each month.

Owner Occupied Value	Units	Percentage
<\$50,000	341	2.4
\$50,000-\$99,999	224	1.6
\$100,000-\$149,999	712	5.1
\$150,000-\$199,999	1,560	11.0
\$200,000-\$299,999	3,937	27.9
\$300,000-\$499,999	5,652	40.0
\$500,000-\$999,999	1,553	11.0
\$1,000,000+	149	1.1

Mo. Housing Costs	Owner w/mortgage		Renter		Total	
<\$500	(1%)	183	(8%)	508	(3.8%)	691
\$500-\$999	(6%)	689	(38%)	2,481	(17.6%)	3,170
\$1,000-\$1,499	(19%)	2,171	(39%)	2,576	(26.4%)	4,747
\$1,500+	(74%)	8,385	(15%)	988	(52.1%)	9,373

Special Needs Housing

Reliable and current data on housing for special needs populations, such as the homeless, chronic homeless, persons with HIV/AIDS, mental illnesses, disabilities, and other specific groups, is not readily available for just the City of Franklin, without extrapolating from larger geographic areas inclusive of the City. The exception to this is that the City conducted homeless counts in January of 2008, 2009, and 2010. As will be detailed later, relatively very few chronic homeless persons were identified and other homeless persons were also not present in large numbers. According to the 3 Year ACS 2006-2008, 271 households, less than 1.5%, received Supplemental Social Security Income (SSI), income designed for aged, blind, deaf, and disabled. The 3 Year ACS data does not provide estimates of disabled persons for the City of Franklin, Williamson County, or the Nashville-Davidson County, Murfreesboro, Franklin MSA. The most consistent data remains projections based on 2000 Census Data and data from third parties, as presented later in this document and in the Special Needs Table. Anecdotally, it is felt special need populations are over represented in the low to moderate income populations targeted with the City’s housing objectives in the Consolidated Plan. There still remains a need to work with other City and County agencies to develop a needs assessment for special needs populations.

Publicly Assisted Housing Units

Outside of public housing units administered by the Franklin Housing Authority, which are discussed in the PHA Master Plan and summarized in other sections of this document, there are an estimated 50 units of multi-family and Section 8 project-based assisted housing units in Franklin. There are no contracts expiring on any of these units through 2008. However, 100% of the contracts will expire in 2009-2013.

How the Characteristics of Housing Influence the Use of Funds

Based on the limited amount of Community Development Block Grant funds available as an initial allocation (projected \$275,000), as well as the characteristics of the housing market discussed above, the City of Franklin will make funds available for the rehabilitation of old units, selected acquisition and rehab of existing units, the production of new units, and counseling for renters wanting to become homeowners and who need to learn about their fair housing rights. The majority of these activities will be for homeownership, although renters will be targeted as potential purchasers. To address the lack of a strong non-profit institutional structure that develops affordable housing, the City of Franklin will explore making funds available under the CBDO provisions of the Community Development Block Grant program to eligible organizations.

Specific populations and income groups to be targeted for assistance were prioritized and discussed in the previous Housing Needs Section. Similarly, two specific neighborhoods, Hard Bargain and Natchez, were discussed and identified as primary target areas in the General Questions Section.

As stated in the Special Needs Housing Section on the previous page, Franklin does propose conducting a Housing Needs and Analysis Assessment for special needs housing. Staff responsible for Consolidated Plan programs will need to be heavily involved in this endeavor.

Direct rental assistance to tenants is not a use of funds that Franklin will pursue during the three-year Consolidated Plan period. The recurring nature and expense of such a program and the unavailability of HOME Investment Partnership funds are two reasons for not providing this type of assistance.

Specific Housing Objectives (91.215 (b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
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 the strategic plan.

3-5 Year Strategic Plan Specific Housing Objectives response:

Priorities and Specific Objectives



Objective 1: Continue Emergency Demonstration Rehabilitation Program

Goals: 15 projects annually.

Objective 2: Identify and fund a Community Based Development Organization(s) (CBDO) to either complete an acquisition/rehabilitation for sale or new construction of a homeowner unit

Goal: 1 project (with a priority of projects in Hard Bargain and/or Natchez) in the first year of the consolidated planning period.

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

Goal: Counsel 15 households in homeownership responsibilities.

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

Resources

Community Development Block Grant funding is the primary resource for completing Objective 1. Objective 2 will be completed with a combination of CDBG funds, private funds of the CBDO on-hand, applied for, or borrowed, and other public funds or in-kind contributions, which could include land, as may be available. Objective 3 will be supported through a limited amount of CDBG funds.

The City of Franklin, the selected CBDO, 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.

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing 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 (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.
2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))
3. 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. (NAHA Sec. 105 (g))

3-5 Year Strategic Plan Public Housing Strategy response:

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 ownership 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 (91.210 (e) and 91.215 (f))

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

3-5 Year Strategic 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 "nimbyism."

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 "nimbyism" 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. 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 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.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

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

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available, the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless 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 and 2010.

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.]

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.

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.
2. A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

Please refer to the Homeless Needs response.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

Please refer to the Homeless Needs response.

Homeless Strategic Plan (91.215 (c))

1. Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless

persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

2. Chronic homelessness—Describe the jurisdiction’s strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.
3. Homelessness Prevention—Describe the jurisdiction’s strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.
4. Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.
5. Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include “policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons.” The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

3-5 Year Homeless Strategic Plan response:

Please refer to the Homeless Needs response.

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.

3-5 Year Strategic Plan ESG response:

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 (91.215 (e))

*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), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. 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.

3-5 Year Strategic 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 2010-2014 Consolidated Plan, many of which are now and will continue to be addressed through existing programs and services. Among the needs cited by local

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.

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 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 incomes 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.

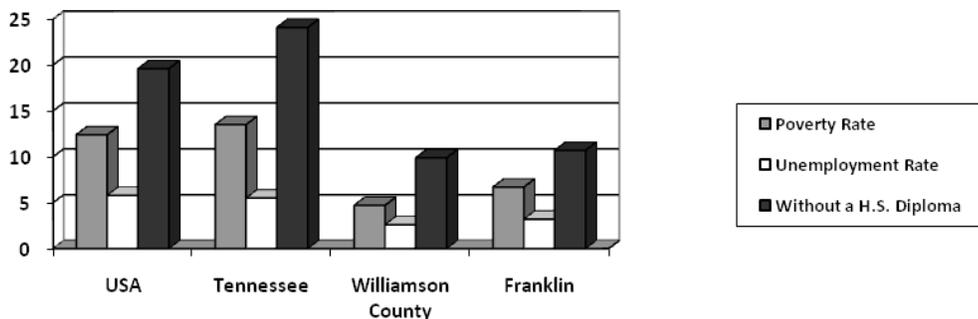
Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.
2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic 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.



Source: 2000 Census

The three indicators in the above chart 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.

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	(4.1%)	595	(5.6%)	412	(1.7%)	7
Married couples	(1.9%)	222	(2.1%)	121	(0.0%)	0
Female-head families	(18.2%)	383	(21.9%)	259	(20.3%)	53

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.

Low Income Housing Tax Credit (LIHTC) Coordination (91.315 (k))

1. (States only) Describe the strategy to coordinate the Low-income Housing Tax

Credit (LIHTC) with the development of housing that is affordable to low- and moderate-income families.

3-5 Year Strategic Plan LIHTC Coordination response:

The City of Franklin is not required to respond to this section, it is for States only.

NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.
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 the strategic plan.

3-5 Year Non-homeless Special Needs Analysis 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 specific 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.

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

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

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.
5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.
6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

Non-Homeless Special Needs Estimate

Please refer the Special Needs Objectives section above for objectives focused on non-homeless special needs populations.

The table below presents available data on certain non-homeless special needs populations. In some cases this data is based on 2000 U.S. Census information for the City of Franklin, and in other cases, such as for the mentally ill and disabled populations, the data is extrapolated from information available from a state or local level source for persons in Williamson County. Fully assessing the validity of these numbers for the City of Franklin will be a major component of the Homeless and Special Needs Housing and Service Assessment. The number of households in need of public housing was determined by the addition of total public housing stock and households on the waiting list for those units.

Non-Homeless Special Needs	Number of Persons
Elderly	3093
Frail Elderly	461
Persons with Severe Mental Illness	436
Developmentally Disabled	2351
Physically Disabled	2371
Alcohol or Other Drug Addicted	na
Persons with HIV/AIDS	33
Public Housing Residents	745
TOTAL Persons with Special Needs	9490

The TOTAL Person with Special Needs line in the above table is shown for discussion purposes only. In addition to many of the specific numbers in the table being extrapolated from Williamson County data, there is also overlap in some categories, such as for dually diagnosed individuals or elderly public housing residents. Again, the planned Needs Assessment by the City of Franklin should help address this issue and better define each Special Need subpopulation.

However, the above data does strongly suggest that the elderly and disabled populations are overwhelmingly the largest Special Need subpopulations in the City of Franklin.

Obstacles to Meeting Underserved Needs of Non-Homeless Special Needs Populations

An obstacle to meeting the underserved needs of Special Needs populations is a lack of readily accessible information on the numbers of persons and families affected and how many of those persons have unmet needs, and a centralized inventory of housing and services available to meet their needs. Once those basic understandings are in place, the City of Franklin and its partners can begin to develop an effective strategy for meeting the needs of its citizens with special needs.

Anecdotally, providers at the Consolidated Plan public hearings spoke about a gap between the availability and need for housing and services for special needs populations. Quantifying those needs in the planned Needs Assessment is a goal of this Consolidated Plan and future updates.

Lastly, regardless of the numbers of persons with special needs, meeting those needs with community development funding will be in competition with meeting the needs of the much larger low to moderate income population. One way the City of Franklin has addressed this is to open the emergency rehabilitation program, which is designed for elderly homeowners, to homeowners who are disabled regardless of their age.

Housing Opportunities for People with AIDS (HOPWA)

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

1. The Plan includes a description of the activities to be undertaken with its HOPWA Program funds to address priority unmet housing needs for the eligible population. Activities will assist persons who are not homeless but require supportive housing, such as efforts to prevent low-income individuals and families from becoming homeless and may address the housing needs of persons who are homeless in order to help homeless persons make the transition to permanent housing and independent living. The plan would identify any obstacles to meeting underserved needs and summarize the priorities and specific objectives, describing how funds made available will be used to address identified needs.
2. The Plan must establish annual HOPWA output goals for the planned number of households to be 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. The plan can also describe the special features or needs being addressed, such as support for persons who are homeless or chronically homeless. These outputs are to be used in connection with an assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
3. For housing facility projects being developed, a target date for the completion of

each development activity must be included and information on the continued use of these units for the eligible population based on their stewardship requirements (e.g. within the ten-year use periods for projects involving acquisition, new construction or substantial rehabilitation).

4. The Plan includes an explanation of how the funds will be allocated including a description of the geographic area in which assistance will be directed and the rationale for these geographic allocations and priorities. Include the name of each project sponsor, the zip code for the primary area(s) of planned activities, amounts committed to that sponsor, and whether the sponsor is a faith-based and/or grassroots organization.
5. The Plan describes the role of the lead jurisdiction in the eligible metropolitan statistical area (EMSA), involving (a) consultation to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA with the other jurisdictions within the EMSA; (b) the standards and procedures to be used to monitor HOPWA Program activities in order to ensure compliance by project sponsors of the requirements of the program.
6. The Plan includes the certifications relevant to the HOPWA Program.

3-5 Year Strategic Plan HOPWA response:

The City of Franklin does not receive HOPWA funds.

Specific HOPWA Objectives

1. 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 strategic plan.

3-5 Year Specific HOPWA Objectives response:

The City of Franklin does not receive HOPWA funds.

OTHER NARRATIVE

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

Fair Housing

The City of Franklin has completed its first Analysis of Impediments (AI) to Fair Housing Choice. 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 recently appointed an Affordable and Workforce Housing Advisory Committee to the Board of Mayor and Aldermen and the 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.

In September, 2008, the City of Franklin submitted their first Analysis of Impediments. Upon review of that previous plan, the Office of Fair Housing and Equal Opportunity (FHEO) determined the information in the AI to be “weak” and not acceptable for approval. FHEO noted that the creation of a Fair Housing Committee to promote, direct and review fair housing activities was a redeeming factor in the AI. The City was instructed to make every effort to revise and resubmit the AI for approval by the end of the current program year, June 30, 2009.

In August 2008, a new City staff position was developed and implemented titled “Housing Development Coordinator”. This 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 Housing Development 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 position has been, to date, funded by the City of Franklin as a staff headcount.

This revised 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.

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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 Allocation of \$15,530 for Fair Housing Training
- Second 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.