

Columbus
Consolidated Government

5-YEAR CONSOLIDATED PLAN FFY 2012 – 2016

PREPARED FOR SUBMISSION TO THE
U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

Prepared by:



FOR

The Columbus Consolidated Government
Department of Community Reinvestment



Columbus Consolidated Government 5 Year Consolidated Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, 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.

Columbus Consolidated Government's 5-Year Strategic Plan Response:

As a recipient of federal grant funds, HUD requires the Columbus Consolidated Government to produce a five-year Consolidated Plan and Annual Action Plan. It also serves as the application for funding for the following federal entitlement programs that serve low-income individuals and/or families:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)

The City's Five-Year Consolidated Plan identifies the community's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them. The City's upcoming five-year strategy will focus primarily on devoting federal, local housing, and community development resources to areas in the City where the greatest concentration of poverty and blight exist.

HUD has established three priority goals for jurisdictions across the country to pursue as part of their consolidated planning efforts: decent housing, suitable living environment, and providing economic opportunity.

The ability of the City to attain these goals utilizing CDBG and HOME funds can be identified through the following performance measures:

Decent housing: The provision of decent housing assists both the homeless and persons at risk of becoming homeless in obtaining housing; retains the existing units in the housing stock; increases the availability of permanent housing in standard condition and at affordable cost to low and moderate-income families. Decent housing also increases the supply of supportive housing with services needed to enable persons with special needs to live independently, and provides affordable housing to low to moderate income persons which are accessible to job opportunities.

Suitable living environment: The provision of a suitable living environment improves the safety and livability of neighborhoods; increases access to quality public and private facilities and services; reduces the isolation of income groups within a community or geographical area by offering housing opportunities for persons of lower-income and revitalizes deteriorating or deteriorated neighborhoods; restores, enhances, and preserves natural and physical features of special value for historic, architectural or aesthetic reasons; and conserves energy resources.

Provide economic opportunity: The provision of expanded economic opportunities creates and retains jobs; establishes, stabilizes, and expands small businesses (including micro-businesses); provides public services concerned with employment; provides jobs to low-income persons living in areas affected by those programs and activities; makes available mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; provides access to capital and credit for development activities that promote the long-term economic and social viability of the community; and provides empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally-assisted and public housing.

Consolidated Plan Summary

Over the next five years, the Columbus Consolidated Government will continue to improve its affordable housing stock for low to moderate income persons through housing rehabilitation, slum and blight clearance and new construction of affordable housing. The City will continue to make payments towards the Section 108 loan and increase economic opportunities throughout the community. The City will also strive to prevent and reduce homelessness with the help of CDBG funds.

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Consolidated 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.

***This Consolidated Plan is for Columbus Consolidated Government Next Five Program
Years
FFY 2012 to FFY 2016***

MISSION:

The City of Columbus plans to use HOME and CDBG funds over the next five years to improve the lives of low to moderate income persons by:

- Improving, Create, and Sustain Affordable Housing
- Increase Suitable Living Environments
- Reduce Poverty/Expand Economic Opportunity
- Continue Supporting Service for Low and Moderate-Income Persons
- Addressing the Issue of Homelessness

Priority Needs:

Priority Need 1: Increase, Create, and Sustain Affordable Housing

The highest priority for the Columbus Consolidated Government is to improve the condition, availability, and accessibility of affordable housing.

The City will address this need by increasing the number of owner-occupied single family homes. The City will use HOME funds to provide downpayment assistance through a Deferred Loan program. The loan will be a 5-year forgivable loan if the homeowner continues to occupy the home. The City will also strive to continue funding its Community Housing Development Organization (CHDO), NeighborWorks, who will construct and rehab affordable homes in Columbus.

The City will also sustain affordable housing through the rehabilitation of owner-occupied homes and rental units. This need is readily addressed with Consolidated Plan resources by working in conjunction with non-profit agencies that have the capacity and are qualified to make long-term renovations.

Priority Need 2: Increase Suitable Living Environments

Enhancing the physical condition of Columbus Neighborhoods is another high priority for the Columbus Consolidated Government. A main goal is to prevent or identify homes that are in deterioration. Through the use of CDBG funds, the City will conduct code inspections on homes throughout Columbus to ensure that the units are still livable. HOME funds will be used to rehabilitate owner-occupied homes bringing them up to code and making them livable. If

rehabilitation is not an option, the City will designate unlivable, dilapidated homes as slum or blight and have these homes demolished. The City will also serve elderly and disabled persons through its Project Care Program with emergency home repairs or accessibility improvements to increase accessibility for disabled persons in their households.

Priority Need 3: Reduce Poverty/Expand Economic Opportunity

The Columbus Consolidated Government will continue to make payments on its Section 108 Loan which was used in an Economic Opportunity Project to acquire buildings and land for redevelopment to increase economic opportunity in the City. The City will also continue to fund agencies that provide services to low and moderate-income persons to reduce poverty and create job opportunities for themselves. These programs will assist City residents with services such as job searching, resume creation, and enhancing interview techniques.

Priority Need 4: Continue Supporting Services for Low and Moderate-Income Persons

A lower priority for the Columbus Consolidated Government is to continue supporting services for low and moderate-income families and individuals in Columbus. Due to the decrease in funding and lack of private funding, non-profit agencies are limited in the amount of resources they are able to dedicate to serving clients. The City will continue funding non-profit agencies through CDBG for services to low and moderate-income citizens.

Priority Need 5: Addressing the Issue of Homelessness

Addressing the issue of homelessness and its negative effects in the City of Columbus was rated as a lower priority due to the increased need of homeless resources in Columbus after the recent economic downturn. This need is to be addressed through the continued funding of non-profit agencies serving the homeless population or those at-risk of becoming homeless. The City will also continue funding its Homeless Task Force Coordinator who will create the Exhibit I Application for the Columbus-Muscogee/Russell County Continuum of Care and assist in coordinating homeless resources throughout the City of Columbus.

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)).

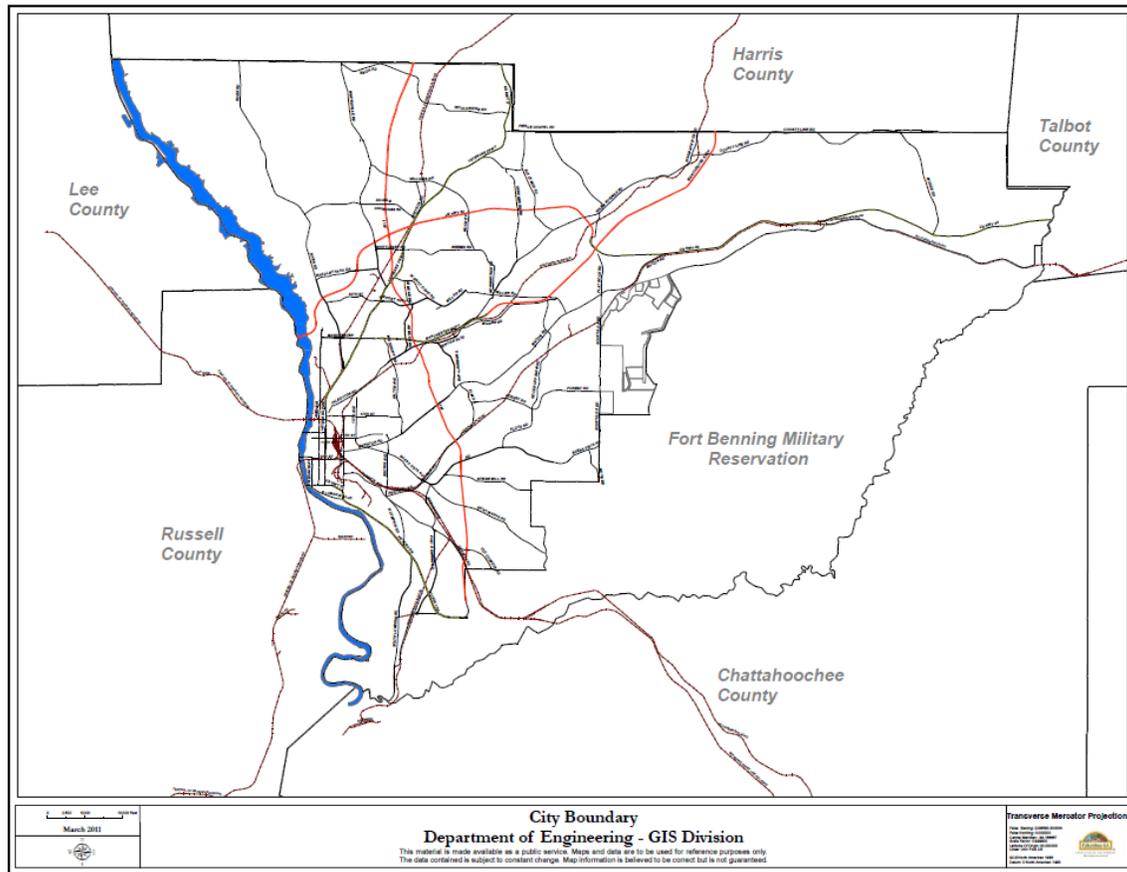
Columbus Consolidated Government's 5-Year Strategic Plan General Questions response:

This section of the Consolidated Plan provides key demographic and other information that is relevant to understanding City of Columbus's housing and community development needs and issues. It includes information on population and household composition and growth, economic conditions, poverty, and race and ethnicity in City of Columbus.

I. Geographic Areas of the Jurisdiction:

Columbus, Georgia is located on the east bank of the Chattahoochee River, which defines the western border of the City. Columbus also sits on the Fall Line where the hilly Piedmont Region in North Georgia merges with the coastal region of South Georgia. As of the 2000 Census count, Columbus had a total population of 186,291. The City's racial makeup consisted of 50.4% White; 43.7% Black or African American; 0.4% American Indian and/or Native Alaskan; 1.5% Asian; 0.1% Pacific Islander; 1.9% from other races; and 1.9% from two or more races; 4.5% were Hispanic or Latino of any race.

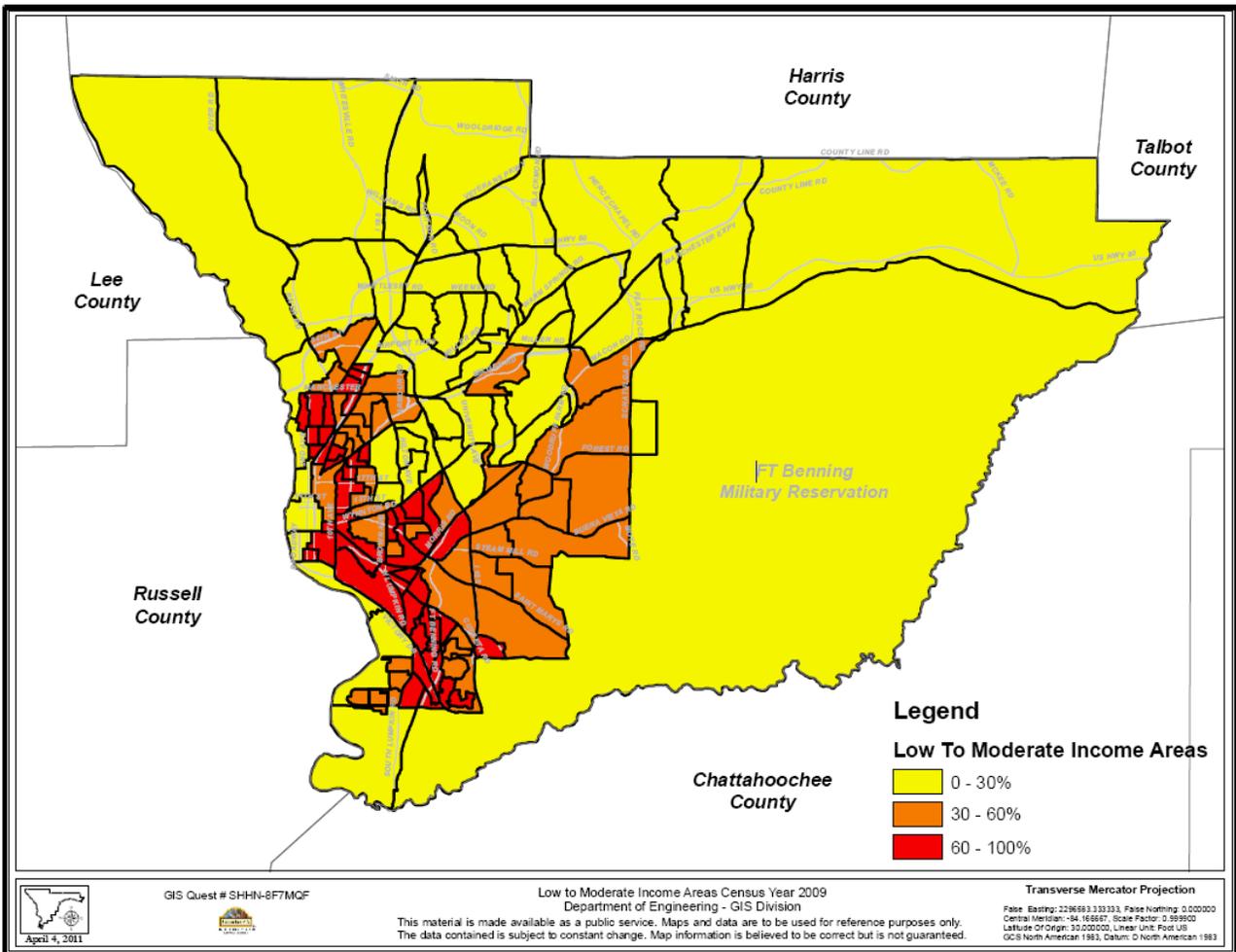
Map I: Columbus-Muscogee County, Georgia



The City defines “area of minority concentration” and “area of low-income concentration” as those census tracts that, according to the latest Census information available, have concentrations of minority populations statistically and significantly larger than the minority or low-income population for the City as a whole. The census tract data is statistically measured by comparing the percentage of minority and low-income households in each Columbus census tract with the average for the community overall.

The following maps and tables display the census tracts that have high levels of low and moderate-income and minority concentration areas within the City. Highlighted census tracts depict areas consisting of 50% or more residents in poverty or 50% or more minority populations.

Map 2: Columbus Low and Moderate-Income Households by Census Tracts



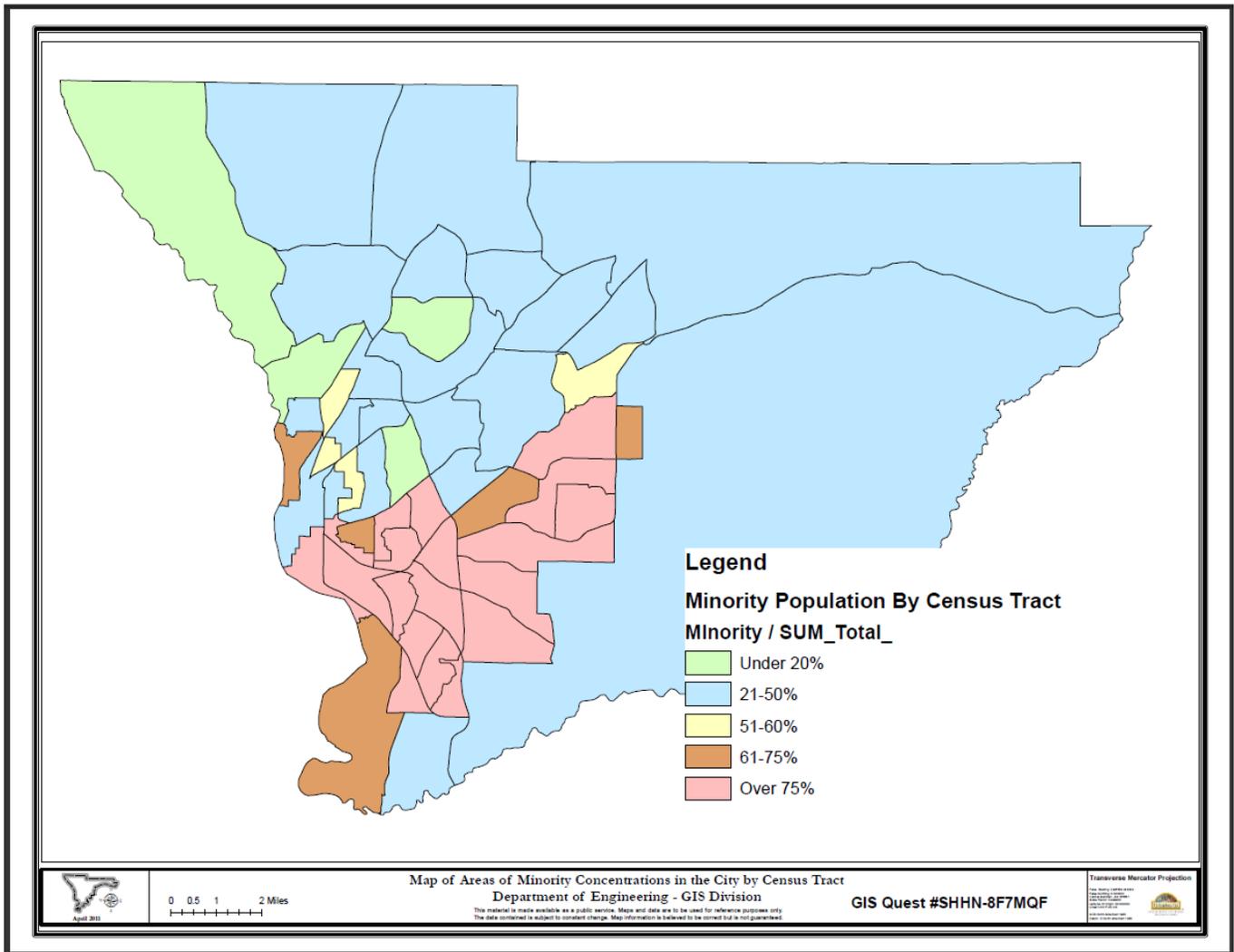
[Source: HUD Census Data]

Table I: Columbus Low and Moderate-Income Households by Census Tracts

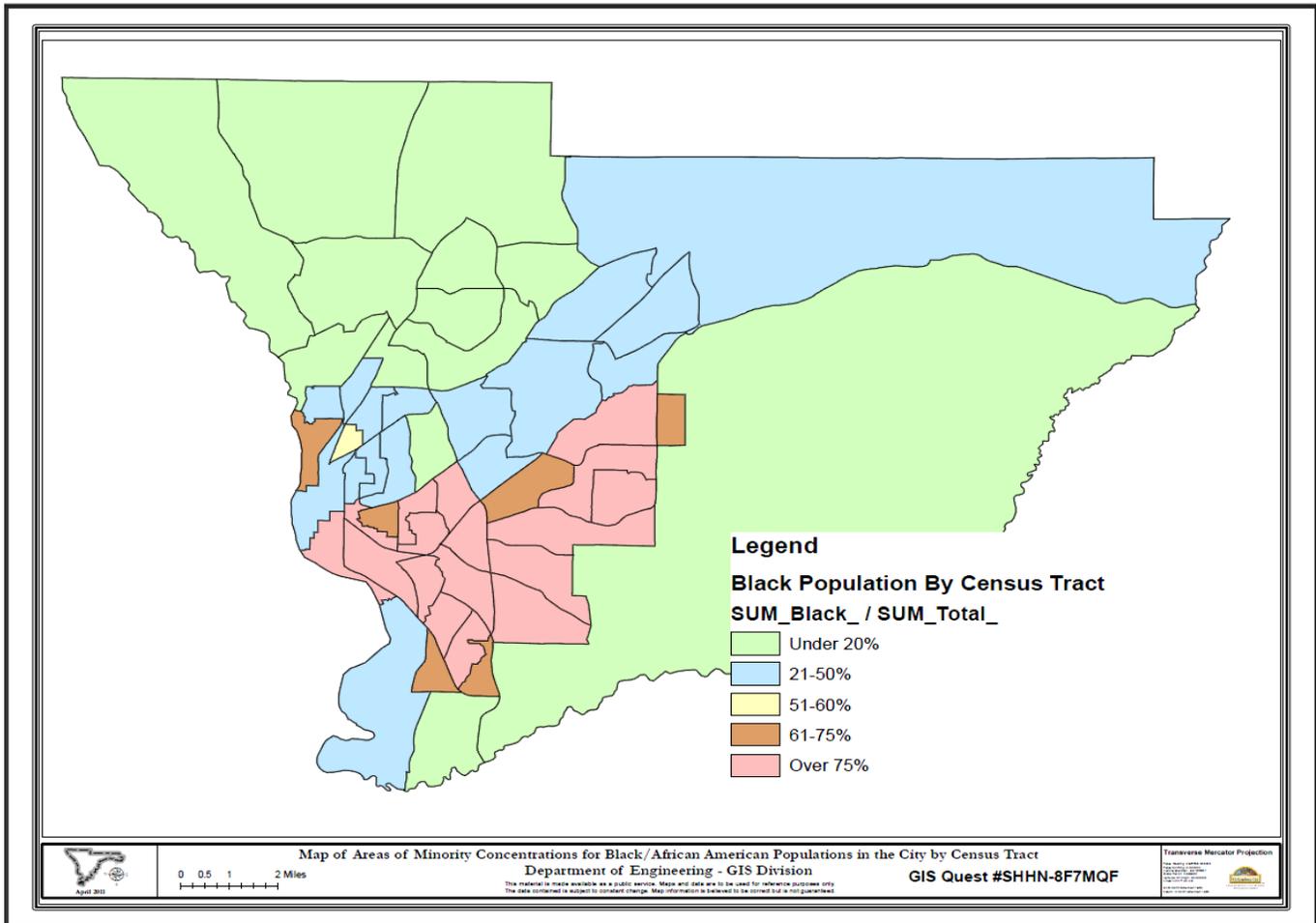
Tract Code	Tract Income Level	% Below Poverty Line	2000 Tract Median Family Income	2010 Est. Tract Median Family Income
1	Unknown	54.69	\$0	\$0
2	Middle	8.58	\$41,090	\$52,023
3	Moderate	27.45	\$20,667	\$26,164
4	Middle	6.3	\$42,024	\$53,204
5	Moderate	23.61	\$22,463	\$28,438
8	Middle	20.43	\$32,821	\$41,554
9	Middle	9.6	\$32,958	\$41,725
10	Upper	5.08	\$50,996	\$64,564
11	Upper	5.91	\$85,247	\$107,925
12	Upper	6.31	\$54,554	\$69,065
13	Low	44.75	\$15,167	\$19,202
14	Low	46.64	\$12,604	\$15,954
15	Low	61.74	\$16,094	\$20,373
16	Low	55.06	\$11,774	\$14,908
18	Moderate	29.93	\$24,153	\$30,578
19	Middle	13.8	\$41,771	\$52,883
20	Moderate	15.4	\$31,821	\$40,285
21	Middle	8.9	\$40,046	\$50,697
22	Moderate	34.41	\$24,911	\$31,536
23	Middle	15.81	\$37,500	\$47,475
24	Low	50.6	\$13,913	\$17,612
25	Low	63.61	\$11,111	\$14,069
26	Upper	12.5	\$63,375	\$80,233
27	Low	45.42	\$16,976	\$21,492
28	Moderate	34.08	\$22,602	\$28,614
29.01	Moderate	17.46	\$31,458	\$39,824
29.02	Moderate	33.49	\$30,399	\$38,487
30	Low	38.11	\$20,234	\$25,615
31	Middle	16.77	\$40,336	\$51,064
32	Low	59.56	\$12,220	\$15,473
33	Moderate	24.33	\$29,931	\$37,892
34	Moderate	28.49	\$22,065	\$27,936
101.02	Upper	1.56	\$71,359	\$90,339
101.04	Upper	3.65	\$57,546	\$72,852
101.05	Upper	5.02	\$80,322	\$101,689
101.06	Upper	5.42	\$50,068	\$63,388
102.01	Upper	2.68	\$65,472	\$82,890
102.03	Upper	4.34	\$63,580	\$80,492
102.04	Upper	5.31	\$61,044	\$77,280
102.05	Upper	1.46	\$67,847	\$85,895
103.01	Upper	2.61	\$131,029	\$165,884
103.02	Upper	1.16	\$67,003	\$84,828
104.01	Upper	4.27	\$52,106	\$65,967
104.02	Middle	7.33	\$43,182	\$54,670
105.01	Upper	6.02	\$52,500	\$66,465
105.02	Moderate	9.97	\$29,545	\$37,405
106.02	Middle	12.17	\$34,858	\$44,128
106.04	Middle	11.12	\$40,968	\$51,867
106.05	Middle	19.4	\$40,020	\$50,666
106.06	Unknown	0	\$0	\$0
107.01	Middle	9.19	\$39,460	\$49,956
107.02	Middle	11.67	\$42,917	\$54,333
107.03	Middle	13.59	\$35,402	\$44,817
108	Moderate	11.14	\$27,985	\$35,431
109	Middle	14.57	\$37,063	\$46,920
110	Moderate	31.51	\$25,313	\$32,049

[Source: HUD Census Data]

Map 3: Columbus Areas of Minority Concentrations

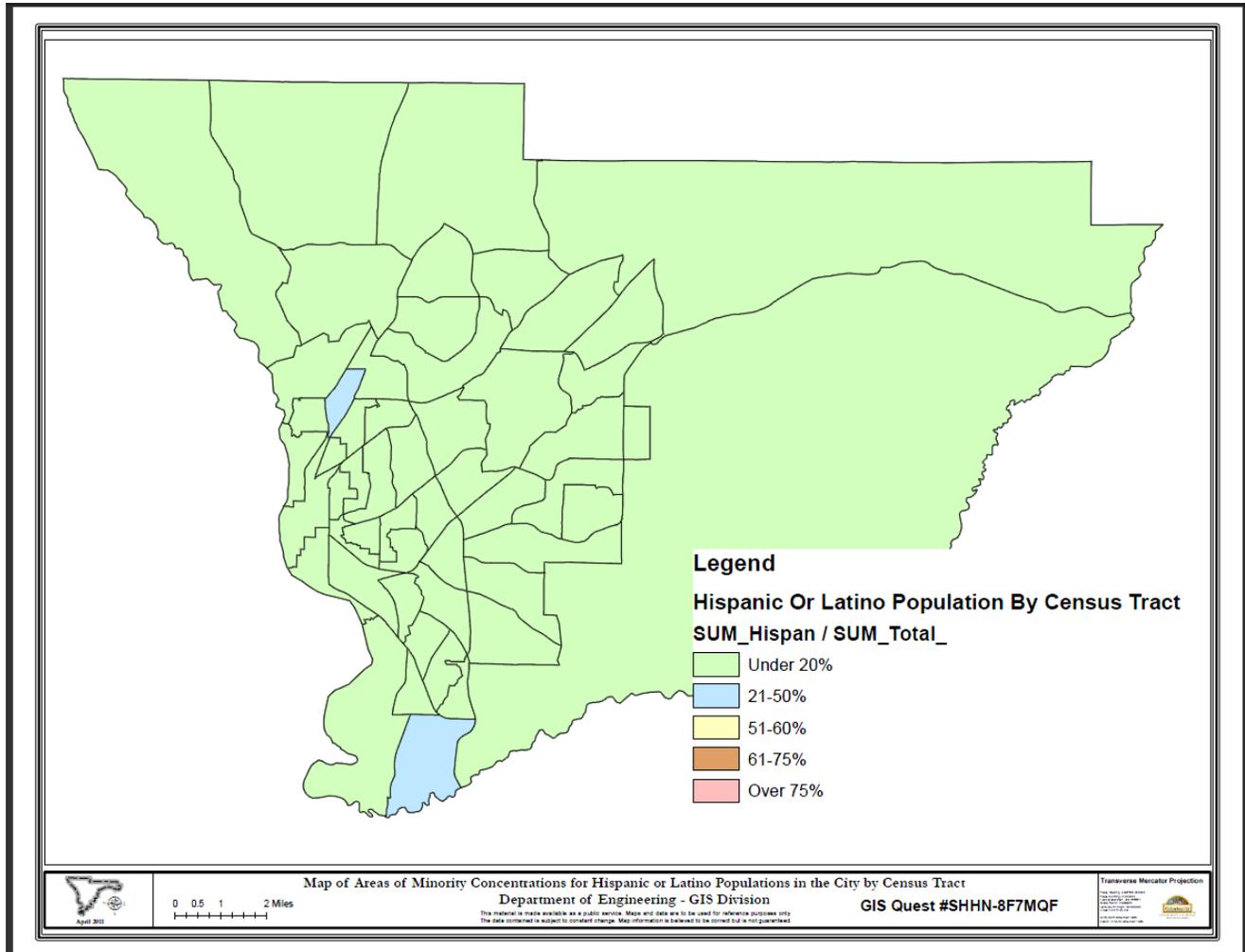


Map 4: Columbus Areas of African American Concentrations



[Source: 2000 US Census Data]

Map 5: Columbus Areas of Hispanic Concentrations



2. Basis for Allocating Investments Geographically Within The Jurisdiction:

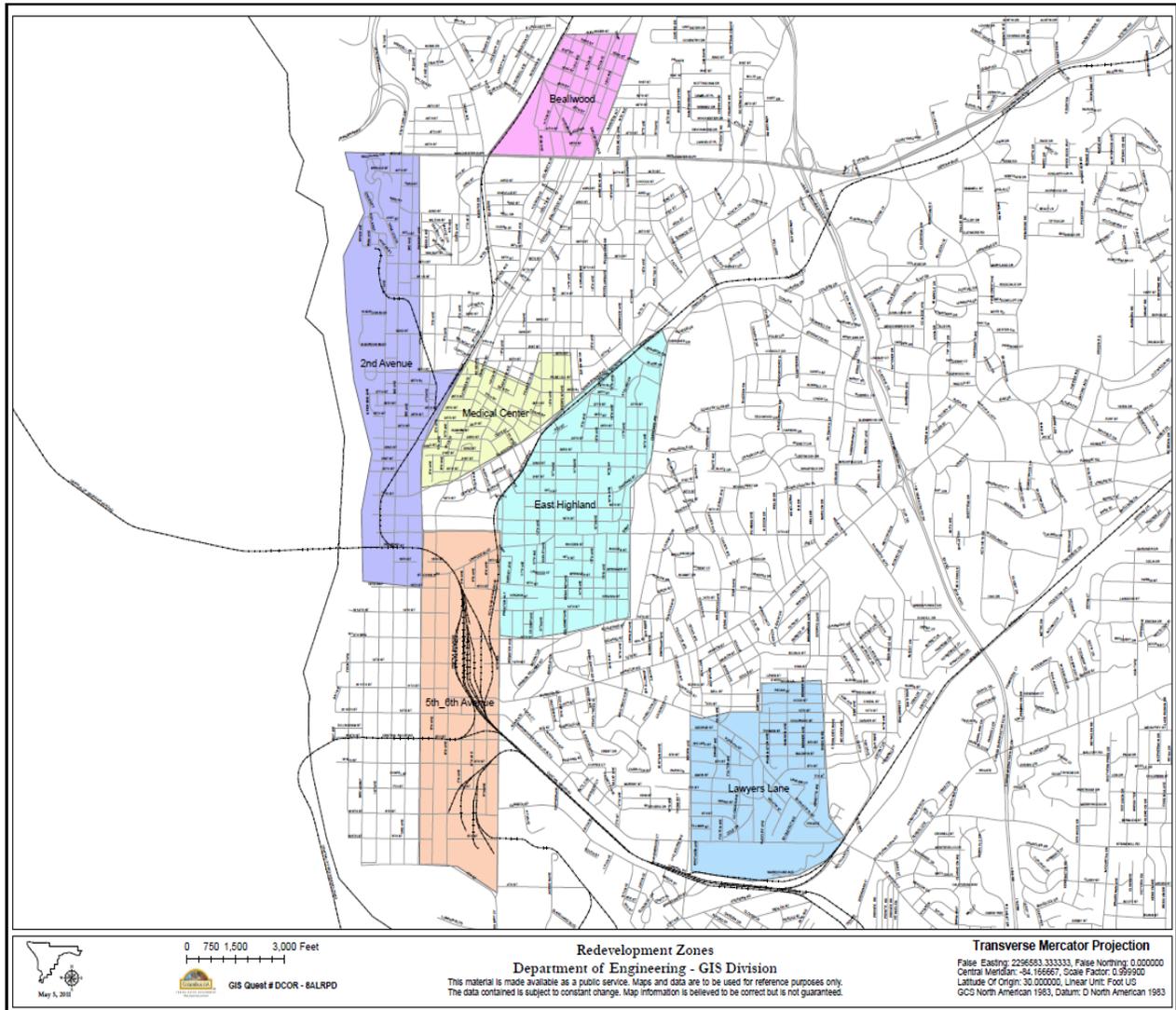
The Columbus Consolidated Government will use HOME and CDBG funds throughout the jurisdiction to serve low and moderate-income persons. A portion of HOME and CDBG funds will be used for the rehabilitation and renovation of single-family homes in low-income neighborhoods to improve household conditions. Funds will also be used for down payment assistance throughout Columbus to increase the number of homeowners.

The City of Columbus has six HUD-approved redevelopment areas where funds will also be targeted: The areas are as follows:

- Beallwood
- 2nd Avenue
- 5th and 6th Avenue
- Medical Center
- East Highlands
- Lawyers Lane

Resources in the 2nd Avenue Redevelopment area will be focused on renovation of dilapidated homes, slum/blight clearance and economic growth. The South Lawyers Lane Redevelopment Area encompasses 77 acres bordered by Martin Luther King, Jr. Boulevard, Brown Avenue, and the rail line right-of-way. Beallwood Redevelopment Area wishes to retain its strong character. Resources in the Medical Center Redevelopment Area will be geared to the growth of medical facilities and slum/blight clearance. The 5th and 6th Avenue area is home to 15 historic landmarks. Due to the history of the area, preservation is a main goal, while slum/blight clearance and infrastructure improvements are also priorities. East Highlands Redevelopment area will focus resources on improving the housing stock, blight, and economic growth.

Map 6: City of Columbus Targeted Redevelopment Areas



3. **Obstacles To Meeting Underserved Needs:**

The following are obstacles to meeting underserved needs in the City:

- The reduction of funding at the local, state, and federal levels will significantly limit the resources available to meet the needs of low and moderate-income residents. With diminished resources, the City and non-profit organizations will be unable to serve all persons who are in need of services and, in some cases, programs will cease to exist due to the decrease in funding.
- As the population of Columbus continues to grow, limitations on affordable housing will become a major barrier. An increased rate of foreclosures in the City has increased the need to provide affordable rental housing.

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.

Columbus Consolidated Government's 5-Year Strategic Plan Managing the Process response:

1. Lead Agency:

The City's Department of Community Reinvestment, as the lead entity/agency, will be responsible for the implementation of the Consolidated Plan which provides a comprehensive strategy to address the City's housing and community development needs [over a five year period] with the use of CDBG and HOME Program funds.

2. Plan Development Process:

The City used WFN, Consulting to prepare its Consolidated Plan through a collaborative effort among community stakeholders – neighborhoods, City agencies, non-profits, elected officials, interested groups, and concerned citizens. The City held a needs assessment workshop at the City's Government Center Annex Building on Monday, February 14, 2011 for non-profit organizations and other professional service organizations to solicit input and

ideas for providing Affordable Housing and community development services for low and moderate-income residents. The City also held two needs assessment workshops for the general public on Monday, February 14, 2011 and Tuesday, February 15, 2011 to receive community input and ideas. The Needs Assessment Workshops were held at a time and location convenient to City residents.

Information gathered from City staff, citizens, non-profit program directors, and housing providers support prior conclusions that the Priority Needs for Affordable Housing are still applicable, and will continue to be addressed in the upcoming planning period.

3. Consultation:

In preparation of the Consolidated Plan, the City consulted with a broad cross section of public, private, and City departments to identify residents' needs and to coordinate appropriate services and programs to meet those needs. The City's Department of Community Reinvestment staff works with these organizations and with CHDO non-profit housing development organizations committed to increasing access to safe, decent, and Affordable Housing throughout the City.

The City conducted needs assessment workshops, small-group in-person interviews, and one-on-one interviews with community stakeholders. Specific stakeholders consulted in the development of this Plan include:

1. Ms. Belva Dorsey, Enrichment Services Program
2. Ms. Mimi Woodson, Columbus City Council
3. Ms. Reather Hollowell, Affirmative Action, Columbus Consolidated Government
4. Ms. Anita Newsome, Mayor's Commission for Person's with Disabilities
5. Ms. Liz Dillard, Homeless Resource Network
6. Mr. Charles Rousseau, Enrichment Services Program
7. Ms. Cathy Williams, NeighborWorks Columbus
8. Ms. Brinkley Pound, Columbus Area Habitat for Humanity
9. Ms. Amy Moore, Columbus Housing Authority
10. Ms. Kim Jenkins, Open Door Community House
11. A. Davita Bynam, Columbus Community Center
12. Mr. Wayne Gallups, Good Shepherd Health Center
13. Ms. Lorraine Cobb, Training Innovations
14. Mr. Willie Siders, Training Innovations
15. Ms. Suzanne Supple, Wynnton Neighborhood Housing, Inc.
16. Mr. Don McCollum, Wynnton Neighborhood Housing, Inc.
17. Mr. Henry Johnson, American Work
18. Mr. Harold Funderburg, CDAC
19. Mr. Michael Jones, Family Connection
20. Mr. David Wallace, New Horizons
21. Mr. Randall Medeiros, Vocational Rehabilitation
22. Mr. Al Wall, New Horizons

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.

Columbus Consolidated Government's 5-Year Strategic Plan Citizen Participation response:

1. Citizen Participation Summary:

The City of Columbus' Citizen Participation Plan reflects the City's compliance with the HUD requirement **24 CFR 91.105(b)** for citizen participation in all appropriate HUD grant programs as of January 2008. The City has devised specific actions to encourage increased participation of ethnic minorities, women, persons with disabilities and non-English speaking persons in its housing and community development programs, particularly by persons of low to moderate-income.

2. Summary of Citizen Comments:

A Public Hearing was held on Thursday, April 7, 2011 at the Columbus Government Center Annex Building at 6:00 p.m. to solicit public comments on a draft copy of the City's FFY 2012-2016 Consolidated Plan. A copy of the public notice was advertised on the City's website, the City's Department of Community Reinvestment website, as well as in the *Columbus Ledger-Enquirer* (the legal organ for the City). A copy of this publication can also be found in the Appendix to this document.

The following comments were received at the Public Hearing:

- The greatest need in Columbus is for jobs. Even public sector jobs like garbage collection and meter reading are dwindling.
- For those people who do work, minimum wage is not enough. A Veterans Administration hospital would serve the large population of veterans in Columbus while bringing good jobs and educational opportunities to the area.
- Code enforcement is uneven. Some sub-standard homes are "cherry picked" for condemnation and demolition while others are allowed to deteriorate.

- The long waiting list for the City's housing rehabilitation program does not help homeowners fast enough to avoid code enforcement violations and demolition.
- Property owners' rights are not protected from the interests of utilities (especially Georgia Power) and demolition due to selective code enforcement.
- No written comments were received.

3. Summary of Efforts Made to Broaden Public Participation:

In an attempt to increase public participation, the City maintained communication with local non-profits and housing developers and adhered to the following actions to improve citizen participation:

ACTIONS TAKEN TO IMPROVE PARTICIPATION

- Conducted evening Public Hearings and Needs Assessment Workshops on various days of the week at the Government Center Annex and at the local Columbus Library to provide multiple opportunities for participation of all residents of Columbus including ethnic minorities, women, persons with disabilities and non-English speaking persons; All meeting locations were ADA accessible;
- Used electronic and English and Spanish Translations of print media to solicit public participation. Electronic media including mass emails to City employees, non-profit organizations, and local businesses; advertisement on City's Website and CCG-TV [Government Access Channel], the Columbus Ledger-Enquirer; and provided links to the Needs Assessment Survey on the City's Department of Community Reinvestment's website.
- Provided at least 72 hours advance notices with the Clerk of Council of the City of Columbus.
- Provided reasonable opportunities for low and moderate-income residents to ask questions and receive answers regarding how they might be affected by the propose use of grant funding.
- Review of all citizen comments and incorporation of such comments in the Consolidated Plan, as applicable;

The City of Columbus will continue to provide a forum for open communication with its residents, particularly low and moderate-income residents regarding its HUD-funded programs. Additionally, the City will also continue to provide reasonable notice for all Public Hearings, information, and records relating to the City of Columbus' housing, community development, and public services program activities that are made available to the public for review and comment according to the requirements of Federal, State, and local laws.

Notices of public hearings are publicized throughout the City. At least 72 hours before the public hearings are held at least one advertisement is placed in the *Columbus Ledger-Enquirer*, a local newspaper of general circulation. The advertisements will be either display ads or legal ads which appear in the sections of the newspaper most likely to be read by citizens

seeking this type of information. Additionally, the notices will be published on the Columbus Consolidated Government's Webpage and the CCG-TV [Government Access Channel].

During the preparation of the City of Columbus' FFY2012-2016 Consolidated Plan, Needs Assessment Workshops were conducted for local non-profits, government officials, and private sector representatives to obtain the specific housing and related services needs for the City of Columbus. Needs Assessment Surveys were prepared and provided to all citizens in attendance. The surveys received were utilized to establish the City's Consolidated Plan priority goals for FFY2012 – 2016. A copy of the survey utilized during needs assessment workshops with non-profits in City of Columbus can be found in the Appendix 4 to this Consolidated Plan. A separate survey regarding Fair Housing Choice was also made available to residents of Columbus.

The City's Department of Community Reinvestment will continue to provide technical assistance to Columbus residents and agencies, particularly to those of very low and low-income who request such assistance in developing project proposals, or who request other information (compliance requirements, program performance, funding information, etc.) as outlined in the FFY2012 -2016 Consolidated Plan. In addition, the City's Department of Community Reinvestment staff will continue to meet with various non-profit organizations and individuals to provide other specific technical assistance related to housing, community development, and human services programs, as requested.

4. Comments Not Accepted:

The City did not receive any comments that were not accepted. No written comments were received regarding the Consolidated Plan.

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.

Columbus Consolidated Government's 5-Year Strategic Plan Institutional Structure response:

1. Institutional Structure:

The City's Department of Community Reinvestment serves as the lead agency for planning and coordinating the implementation of the Consolidated Plan. The U.S. Department of Housing and Urban Development requires that, during preparation of the Consolidated Plan, entitlement communities consult with other public and private agencies that provide services to low and moderate-income families. The City also consulted with other public and private agencies that provide assisted housing, health services, and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during preparation of the plan. The City is in full compliance of this requirement. As a part of the planning process, the City met with various non-profit agencies involved in the implementation of these various programs to discuss housing and non-housing needs of residents of Columbus involved in the implementation of these various programs to discuss housing and non-housing needs of Columbus residents.

2. Strengths and Gaps in the Delivery System:

The City's Department of Community Reinvestment continues to strengthen its working relationships with these agencies with particular emphasis on housing needs and economic development initiatives as they are planning in the Strategic Consolidated Plan process. These efforts are to ensure that the City's CDBG and HOME funded activities are targeted to low to moderate-income residents and are fully coordinated in the comprehensive community development goals of the Plan. Sub-recipients have reported that the City's Community Reinvestment Staff are knowledgeable and understand the issues of low and moderate-income residents of Columbus.

The primary weakness evidenced through the public meetings and interview process is the lack of collaboration and communication among the various non-profits serving the City of Columbus. As no centralized network of social services exists in the City, many residents struggle to determine which non-profit to contact for various needs.

3. Strength and Gaps in Public Housing:

The Housing Authority of Columbus (HACG) operates a variety of self-sufficiency programs that range from rental assistance to housing educational opportunities. The Columbus Housing Authority has developed partnerships with private developers and local organizations to increase and improve affordable housing in Columbus. A significant gap in the City of Columbus' delivery system for public housing is the lack of federal funding and the increased need for affordable housing. However, during the upcoming Consolidated Plan period the HACG will continue to strive for improvement in management of the agency and improving the living environment of residents through revitalization and demolition of public housing units.

Monitoring (91.230)

- I. 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.

Columbus Consolidated Government's 5-Year Strategic Plan Monitoring response:

I. Monitoring Plan Implementation Process:

The Department of Community Reinvestment of the Columbus Consolidated Government is responsible for ensuring that the federal funds expended on activities to benefit low and moderate-income households are in compliance with federal guidelines. The Office's performance monitoring activities include onsite monitoring, desk reviews, and technical assistance for sub-recipients.

In an effort to ensure long-term compliance with program requirements and comprehensive planning requirements, all sub-recipients enter into a contractual agreement with City. These agreements include a detailed scope of services with measurable objectives. The federal general provisions, along with the appropriate OMB Circulars, are included in contractual agreements to ensure compliance. The budget line items must be reflective of the goals and objectives.

The City's Department of Community Reinvestment staff conducts on-site monitoring of sub-recipients on an annual basis. City staff will evaluate sub-recipient's programmatic and fiscal management policies. City staff will utilize the HUD Monitoring Desk Guide to review CDBG and HOME sub-recipients. Additionally, Sub-recipients are required to provide periodic reports on their achievement of contractual objectives.

The City's Department of Community Reinvestment will continue to internally monitor its grant programs in accordance with local program policies and procedures and Federal regulations and will continue to monitor all sub-recipients receiving CDBG and HOME funds. The monitoring process will include on-site reviews of the sub-recipient's performance to ensure compliance with the goals and objectives of the program and federal regulations.

Lead-based Paint (91.215 (g))

Columbus Consolidated Government's 5-Year Strategic Plan Lead-based Paint response:

- I. 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.

I. Housing Units Containing Lead-Based Paint Hazards:

Lead poisoning is the leading environmental hazard to children, creating devastating and irreversible health problems. The leading cause of lead-based poisoning is exposure to dust from deteriorating paint in homes constructed before 1978. This is due to the high lead content used in paint during that period, particularly in homes built before 1950. Pre-1978 housing occupied by lower income households with children offers particularly high risks of lead exposure due to the lower levels of maintenance among lower income households. This is an important factor since it is not the lead paint itself that causes the hazards, but rather the deterioration of the paint that releases lead-contaminated dust and allows children to peel and eat lead-contaminated flakes.

The risk factors for lead poisoning include:

- Living in a home built before 1950
- Living in a recently remodeled home built before 1978

Columbus housing stock built before 1969 (37,654 units), has a higher probability of containing lead-based paint than houses built between 1970 and 1978. In Columbus: 36% of existing homes have been built since 1980; 18% of the homes have been built between 1970 and 1979; and 45% of the housing stock was built prior to 1970.

Table 2: Columbus Housing Stock

Year House Built	Total Units
Built 2005 or later	2,350
Built 2000 to 2004	6,775
Built 1990 to 1999	9,671
Built 1980 to 1989	11,323
Built 1970 to 1979	15,007
Built 1960 to 1969	13,168
Built 1950 to 1959	11,859
Built 1940 to 1949	6,583
Built 1939 or earlier	6,044
Total Units Built	82,780

Columbus Housing Stock: [Source: 2009 Census Estimates for Columbus/Muscogee County]

The U.S. Environmental Protection Agency’s “Report on the National Survey of Lead-Based Paint in Housing” released in 1995 found that 83% of the nation’s privately owned housing units built before 1980 had lead-based paint somewhere in the building.¹ The survey found

¹ Report on the National Survey of Lead-Based Paint in Housing: Base Report. U.S. EPA/HUD, June 1995. <http://www.epa.gov/lead/pubs/r95-003.pdf>.

“no statistically significant differences in the prevalence of lead-based paint by type of housing, market value of the home, amount of rent payment, household income, or geographic region”. Applying this percentage to the housing stock in the City of Columbus, as many as 43,708 units in the City are likely to contain lead-based paint.

Table 3: Columbus Lead Summary Data

Year	# of Children Tested	Percent of Children Tested	Total # of Confirmed Cases	Percent of Children With Elevated Blood Lead Levels	# of Addresses-Multiple Children w/ Confirmed EBLLs *	Census 2000 Data			Estimated Population of Children < 6, 2008
						Total Housing Units	Pre-1950 Housing Units	% of Children < 6 Under Poverty	
2008	340	1.9%	0	0.00%	0	76,182	11,631	25.0%	17,520
2007	564	3.2%	0	0.00%	0	76,182	11,631	25.0%	17,724
2006	642	3.6%	6	0.90%	0	76,182	11,631	25.0%	17,686
2005	638	3.7%	0	0.00%	1	76,182	11,631	25.0%	17,214

Columbus/Muscogee Lead Summary Data: [Source: Centers for Disease Control and Prevention, Georgia County-Level Lead Datasheet. <http://www.cdc.gov/nceh/lead/data/state/gadata.htm#2008elevated>]

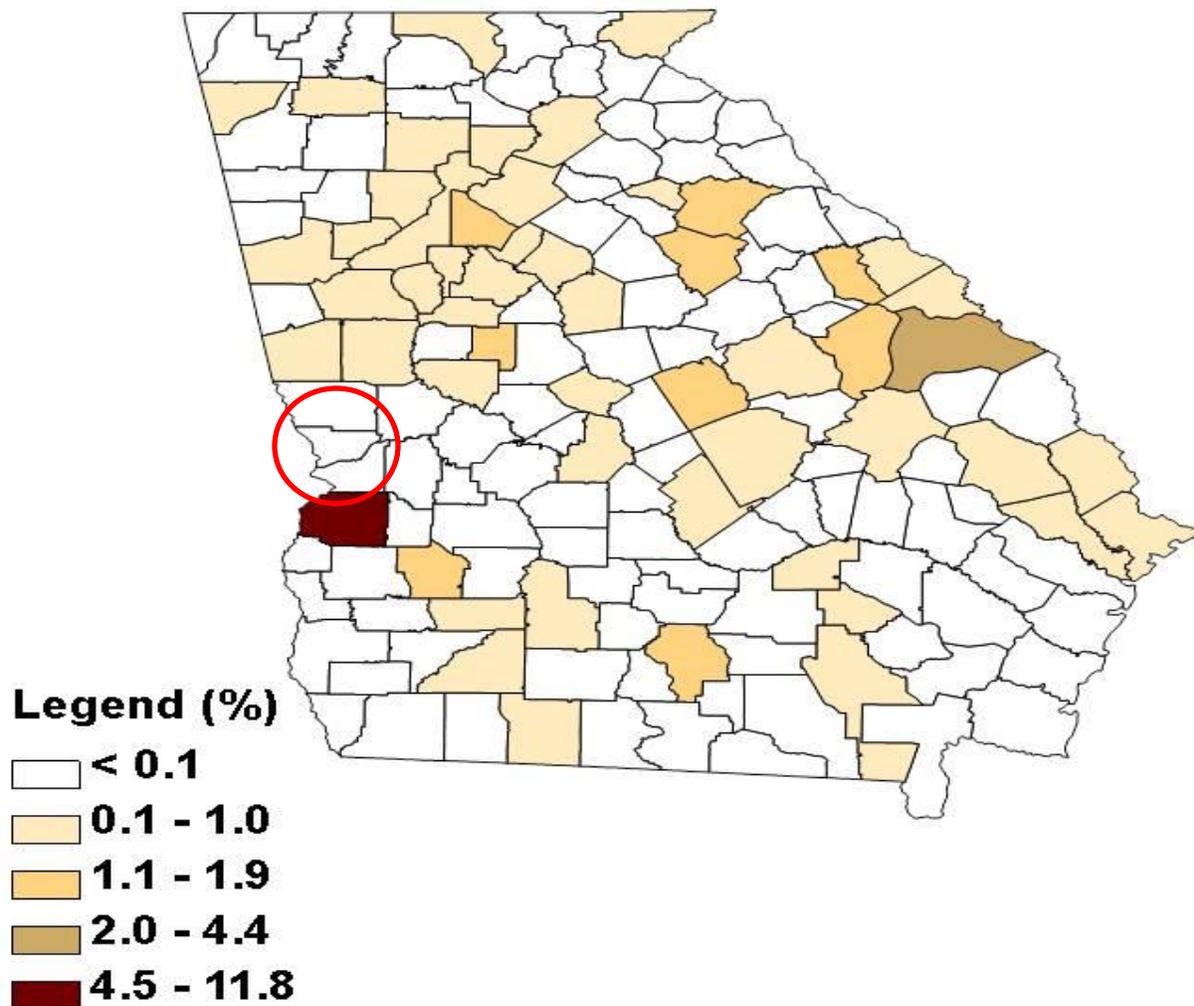
Despite the high potential for exposure to lead-based paint hazards, the rate of confirmed cases of lead poisoning in children is very low. According to the table above which includes data for 2005-2008, only six confirmed lead poisoning cases were recorded during this four-year period. This may be attributable to increased emphasis on elimination of lead-based paint hazards. The map below shows the percentage of lead poisoning cases across the State of Georgia in 2008. Columbus falls within the <0.1% range for children with elevated blood lead levels.

Map 7: Percent of Children with Elevated Blood Lead Levels



Healthy Homes and Lead Poisoning Prevention

Percent of Children with Elevated Blood Lead Levels* by County Georgia, 2008



*Percent of children with elevated blood lead levels: The number of children less than 72 months of age with a confirmed elevated blood lead level $\geq 10 \mu\text{g/dL}$ divided by the number of children less than 72 months of age tested for blood lead, multiplied by 100.

Source: Center for Disease Control

2. **Evaluation/Reduction of Lead-Based Paint Hazards:**

Because lead poisoning is a serious, yet preventable health problem that can cause long-term neurological damage among young children, the City of Columbus is committed to addressing this health hazard.

The City plans to continue using a certified private contractor to remove lead from housing where funds will be invested for rehabilitation or other purposes. A private contractor is also used to conduct lead-based paint testing and Lead Risk Assessments. In any cases where testing indicates the presence of lead, it will be properly removed or abated.

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, sub-standard 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.

Columbus Consolidated Government 5-Year Strategic Plan Housing Needs response:

1. Estimated Affordable Housing Needs by Category:

Projected Housing Needs

Housing needs are based primarily on the condition of existing homes, and on the ability of residents to maintain and repair their homes, as well as on their ability to afford the costs of home mortgage payments or rental costs. Based on HUD provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems, based on income level. The need indicated by these figures is expected to remain essentially constant over the next five years, except as affected by an unusually large increase in capacity to provide homeowner/renter assistance to low and moderate-income residents, or a significant change in economic conditions. As such, the

current economic downturn or recession has substantially increased the number of households experiencing housing problems and cost burden.

Understanding the specific housing needs of low-income, priority needs households are critical to developing a realistic and responsive affordable housing strategy. As part of its consolidated planning process, the Columbus Consolidated Government conducted an assessment (See Chart Below) of the affordable rental and for sale housing supply and demand in Muscogee County. Available demographic, economic and housing data for the Muscogee County market was used to quantify the current and projected five-year housing supply and demand for priority need households in the City. Highlights of the assessment are provided in this section.

HUD receives a “special tabulation” of data from the U.S. Census Bureau [American Community Survey (ACS)] that are largely not available through standard Census products. These “special tabulation” data provide counts of the numbers of households that fit certain combinations of HUD-specified criteria such as housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of median income) and household types of particular interest to planners and policy-makers. This data, known as the Comprehensive Housing Affordability Strategy (CHAS) data, are used by local governments for housing planning as part of the Consolidated Planning process. HUD may also use some of this data in allocation formulas for distributing funds to local jurisdictions².

A. Priority Needs Housing:

Identifying A Priority Needs Household:

HUD requires communities to focus their Consolidated Plan’s and invest their federal resources on priority needs households, the following defines these resources.

Housing Tenure

Homeownership rates vary depending on demographic characteristics of households such as ethnicity, race, type of household as well as location and type of settlement. The CHAS data below displays owner/rental households for Muscogee County.

Housing Needs by Tenure in Muscogee County, GA [CHAS 2000]

Renter Households

Extremely Low Income Household Types [0-30% MFI]

Household Type	1990	2000
Total	6,575	6,463
Elderly	1,578	1,287
Small Family	3,078	2,670
Large Family	662	572
All Other Households	1,257	1,934

² “2009 Consolidated Planning/CHAS Data” <http://www.huduser.org/portal/datasets/cp.html>

Low Income Household Types [31-50% MFI]

Household Type	1990	2000
Total	4,071	4,455
Elderly	982	864
Small Family	1,683	2,085
Large Family	574	384
All Other Households	932	1,122

Moderate Income Household Types [51-80% MFI]

Household Type	1990	2000
Total	6,484	6,280
Elderly	635	662
Small Family	3,780	3,155
Large Family	697	594
All Other Households	1,372	1,869

Middle to Higher Income Household Types [80% and over MFI]

Household Type	1990	2000
Total	2,465	13,173
Elderly	190	935
Small Family	1,351	6,748
Large Family	242	1,275
All Other Households	682	4,215

As depicted in the comparison of the CHAS data for Muscogee County, the need for affordable housing is significant and has continued to increase over the last ten years due to the increase in rental prices and home values. Additionally, high foreclosure rates within the County have also increased the demand for affordable rental housing.

Owner Households

Extremely Low Income Household Types [0-30%MFI]

Households Type	1990	2000
Total	2,107	2,190
Elderly	1,145	1,017
Small Family	-	583
Large Family	-	175
All Other Households	962	415

Low Income Household Types [31-50% MFI]

Households Type	1990	2000
Total	2,433	2,840
Elderly	1,464	1,600
Small Family	-	699
Large Family	-	213
All Other Households	969	32

Moderate Income Household Types [51-80% MFI]

Households Type	1990	2000
Total	4,228	5,227
Elderly	1,922	2,119
Small Family	-	1,943
Large Family	-	380
All Other Households	2,306	785

Middle Income Household Types [81-over% MFI]

Households Type	1990	2000
Total	2,251	29,083
Elderly	834	6,749
Small Family	-	16,234
Large Family	-	2,760
All Other Households	1,417	3,340

In this portion of the analysis CHAS data was combined to highlight the difference between low-income homeowners and renters. As shown in the data above, Muscogee County has a consistent increase of renter and owner households over the last ten years.

Special Needs (Non-Homeless):

The special needs population includes individuals having mobility impairments, disabilities or that require supportive services. Typically, this population has severe or persistent mental illness, developmental and/or physical disabilities, HIV/AIDS and/or chronic substance abuse addiction. An estimated 37,083 persons with disabilities make up 19.9% of the total population for Muscogee County.

Public Housing Residents:

Public housing is a distinct subset of the County’s housing supply. It is primarily rental housing that serves households earning 30% or less of the area median family income. The Housing Authority of Columbus owns and operates the County’s Conventional Housing Program and owns 1,666 public housing units under this program. The Housing Authority of Columbus also administers 2,329 vouchers through the Housing Choice Voucher Program.

Specific Housing Problems:

Housing needs are based primarily on the condition of existing homes, and on the ability of residents to maintain and repair their homes, as well as on their ability to afford the costs of home mortgage payments or rental costs. Based on HUD provided figures, the small family and large family data indicates the number and percentage of renters and homeowners who may be subject to housing problems, based on income level. The current economic downturn or recession has substantially increased the number of households experiencing housing problems and cost burden issues.

Cost Burdens:

In 2000, 32% of all renter households and 20.8% of owner households paid over 30% of their annual household income for housing and reflects a significant cost burdens.

Severe Cost Burdens:

In 2000, 16.5% of all renter households and 7.6% of owner households paid over 50% of their annual household income for housing and reflects a severe cost burden on residents.

Overview of Housing Tenure:

Several general observations can be made from the CHAS data: First, decreasing income usually equates to greater housing problems and cost burden, with the exception that very low-income renters have fewer housing problems than low-income renters. This may (although the data does not provide an explanation) be due to the higher number of very low-income renters who are likely to live in subsidized housing. Second, the relationship between renters and owners is a much more mixed result. Owners do not necessarily have a lower cost burden – this may relate to owners assuming a substantial debt in purchasing a home.

2. Disproportionate Need:

African-American and Hispanic minority populations all experience a greater likelihood of having more housing problems and a greater cost burden than white residents.

Table 4

	Total Renters	Total Owners
Household Income <=30% MFI		
BLACK	4,560	1,135
% with any housing problems	75.4	78.4
WHITE	1515	910
% with any housing problems	74.9	72.0
HISPANIC	245	35
% with any housing problems	69.4	71.4
Household Income >30 to <=50% MFI		
BLACK	2,635	1,045
% with any housing problems	65.1	65.1
WHITE	1545	1640
% with any housing problems	69.3	42.7
HISPANIC	155	80
% with any housing problems	74.2	75
Household Income >50 to <=80% MFI		
BLACK	2,975	2,060
% with any housing problems	28.2	48.2
WHITE	2720	2930
% with any housing problems	42.5	37.9
HISPANIC	345	120
% with any housing problems	30.4	75
Household Income >80% MFI		
BLACK	5,740	8,485
% with any housing problems	13.3	15.9
WHITE	6365	19295
% with any housing problems	5	9.6
HISPANIC	559	709
% with any housing problems	28.6	17.5

Source: 2000 CHAS data

As shown in Table 4, more than 69.4% of the renter population and 71.4% of the owner population of all races with household incomes of 30% MFI or less have the greatest disproportionate need for housing problems. While renters and owners of all races with less than 50% MFI also have a large percentage of housing problems reflecting a similar disproportionate need for housing problems.

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.

Columbus Consolidated Government's 5-Year Strategic Plan Priority Housing Needs response:

1. Priority Housing Needs:

Understanding how many and the types of priority needs households is important in helping to determine the unmet demand for affordable housing and the priorities for the development mix needed to meet the demand.

Increase access to affordable housing for low and moderate-income persons:

- Rehabilitation of existing homeowner and rental housing units (HOME and CDBG funding for renovation)
- Reduction of the cost of development of rental housing (HOME and CDBG funding for land acquisition, pre-development costs, and construction or renovation)
- Encourage private and non-profit developers by funding acquisition & rehabilitation (HOME and CDBG grants or low interest loans to developers to reduce the total cost of development)

Eliminating homelessness for special needs populations:

- Provide financial assistance to non-profit agencies serving the homeless population through emergency shelters or temporary housing (CDBG and ESG funds)

Providing supportive housing for persons with special needs:

- Provide financial assistance to non-profit agencies serving populations with special needs

Categories of Persons Affected:

Categories of Persons Affected estimates the number and types of families in need of housing assistance over the next five years for extremely low and very low-income households in Muscogee County.

All Households:

As previously identified, the Comprehensive Housing Affordability Strategy (CHAS) data, is used by local governments for housing planning as part of the Consolidated Planning process. This section defines household categories by tenure and housing problems for three subsets of the population to include the Elderly, Small Families, and Large Families at various income levels.

Household Categories:

Small Related Households:

Small related households – families of two to four persons – account for 54% percent of low-income households (incomes below 80% AMI) in Muscogee County. The current estimated number of small related, low-income renter households is 13,173 and the estimated number of small related, low-income owner occupied housing was 19,459.

Large Related Households:

Large related households, which are defined as households consisting of 5 or more persons, have a greater percentage of housing need than any other household type. The high price and limited supply of larger housing units force many families to either live in overcrowded, smaller units or overpriced, larger homes. As a result, 57.9% of large family renters have some type of housing need and 33.1% of large family owners have some type of housing need. Of which, 27.6% of renters and 20.8% of owners are cost burdened; and 15.0% of renters and 6.8% of owners are extremely cost burdened.

Income Groups:

The **Median Family Income** refers to the median family income established annually by the U.S. Department of Housing and Urban Development (HUD). The estimated median family income for Muscogee County is \$51,800. According to HUD guidelines, low-income households earn less than 80% of the area median income.

2. Analysis of Characteristics of the Housing Market:

As researched in 2006-2008 Census Estimates, Muscogee County mortgage-owner residents had a median monthly housing costs of \$1,651, while the median monthly housing

costs for renters was \$425. Of the 39,908 owner-occupied units, 73% of those had mortgages, while 27% did not have mortgages. Of the 30,445 occupied rental units, 79.78% of those renters spent 30% or more of their household income on housing³ [as evidenced by the large median rental housing costs].

The need for affordable rental housing in Muscogee County has continued to increase over the last ten years. According to the 2009 Census Estimates, the County's gross median rent was \$563 and the median household income was \$39,438. According to the most recent census estimates the median home values in the City was \$133,700.

3. Basis for Assigning the Priority:

The basis for assigning the priority need to the goal of increasing affordable housing is derived from the market conditions described previously which led to the assigning of priorities given to each category of priority needs in this Plan. Unless methods for creating such affordable housing can be developed, the stock of affordable housing will continue to decline – placing an increased burden on very low, low, and moderate-income residents. Decline in the maintenance of existing older housing is the primary cause of deterioration over time, and ultimately, loss of the County's affordable housing stock. By assisting homeowners with repairs to correct code deficiencies, the City can keep this valuable housing stock in the market. It is particularly important to work with older low-income homeowners in this matter, since they own much of the older housing stock. Rehabilitation of this stock not only provides decent housing for them, but it also assures that the homes of these residents remain sustainable.

The basis for assigning the priority need to the goal of providing decent housing is derived from the need to improve condition, availability, and accessibility of affordable housing in Columbus, GA.

The basis for assigning the priority need to the goal of providing a suitable living environment is derived from the need to reduce homelessness, the need to increase suitable living environments, and the need to provide public services for low and moderate-income families residing in Muscogee County.

The basis for assigning priority of expanding economic opportunity is derived from the need to reduce poverty and foster economic improvements and to continue to meet all programmed financial obligations.

4. Obstacles to Meeting Underserved Needs:

Obstacles in increasing affordable housing include:

- Lack of availability of affordable single family homes in good condition
- Disparity in loan origination from lower income groups versus higher income groups
- Lack of profits for developers of affordable housing

³ Muscogee County, GA. "Population and Housing Narrative Profile: 2006 – 2008." American Community Survey. <http://www.census.gov/>

- ❑ Lack of affordable rental units for former homeowners
- ❑ Limited number of affordable units for large families
- ❑ Difficulty for low and moderate-income families to accumulate down payment and closing costs
- ❑ Limited enforcement of housing codes
- ❑ Deteriorating housing stock, particularly of elderly residents on limited incomes
- ❑ Cost of rehabilitation often driven by regulatory requirements
- ❑ Hesitancy of financial institutions to provide rehabilitation funding in deteriorating neighborhoods

Obstacles in eliminating homelessness include:

- ❑ Lack of adequate resources
- ❑ Capacity of non-profit may limit the agencies ability to serve a large population of homeless individuals

Obstacles in providing supportive housing for persons with special needs:

- ❑ Lack of adequate resources
- ❑ Capacity of non-profit may limit the agency's ability to serve a large population of homeless individuals

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.

Columbus Consolidated Government's 5-Year Strategic Plan Housing Market Analysis response:

I. Significant Characteristics of the Housing Market:

□ Housing Supply

The City of Columbus has a total of 83,995 housing units, of which 7.8% were vacant as of the 2009 ACS Estimates. Much of the housing stock in Columbus has aged, as evidenced by the 85.2% of units built prior to 1990. Also revealed in the researched housing characteristics was the “breakdown” of the available housing units:

- Of the 83,995 total housing units:
 - 65.9% were single-unit [detached] structures
 - 31.5% were multi-unit [attached] structures
 - Less than 2.6% was mobile homes.

- Of the 83,995 total housing units [of which 74,569 are occupied]:
 - 53.5% are owner occupied [39,908]
 - 46.5% are renter-occupied [34,661]
 - While only 2.5% did not have access to telephone service

- Of the 74,569 occupied housing units:
 - 9.1% of these households did not have access to a personal vehicle
 - 74.2% of these households had one or two vehicles
 - And 16.8% of these households had three or more vehicles.

As researched in 2009 Census Estimates, Columbus mortgage-owner residents had a median monthly housing cost of \$1,151.00, while the median monthly housing costs for renters was \$729.00. Of the 39,908 owner-occupied units, 73% of those had mortgages, while 27% did not have mortgages. Of the 34,661 occupied rental units, 49.8% of those renters spent 30% or more of their household income on housing⁴ [as evidenced by the large median rental housing costs].

➤ Single Family vs. Multi-Family:

Single family housing units in Columbus consist of 65.9% of the total housing units, while the City only has 31.5% of housing units identified as Multi-family housing units. Mobile homes now account for 2.6% of all housing within the City.

➤ Owner-Occupied Units:

A majority of the households in the City of Columbus are occupied: of a total of 74,569 housing units in the City were occupied. Of the occupied units in the City, 39,908 (53.5%) were owner-occupied units. Owner-occupied units tended to be larger than rental units. Approximately 59.2% of all housing units within the City have 3 bedrooms

⁴ City of Columbus, Georgia “Population and Housing Narrative Profile: 2006 – 2008.” American Community Survey.
<http://www.census.gov/>

or more, while approximately 29.4% have 2 bedrooms, and 10.3% are 1-room efficiencies [one-bedroom units].

➤ **Renter-Occupied Units:**

Renters occupy 34,661 (46.5%) of the housing units in the City. Rental units tend to be smaller. The need for affordable housing has continued to rise due to the current economic downturn. Housing providers have indicated, and the numbers confirm, that there is still a gap in the number of larger, affordable rental units for large families. According to the National Low Income Housing Coalition’s “Out of Reach” 2010 Annual Report, in Columbus without paying more than 30% of income on housing, a household must earn \$4,317 monthly or \$51,800 annually⁵.

➤ **Rental vs. Owner Occupied Units:**

As shown in the table below, the City has experienced an increase in total housing units since 2000 [10.6%]; however the percentage of occupied housing units has decreased. Additionally, the percentages of vacant housing units have increased to 11.2% since 2000.

Table 5: Total Housing Units: Owner-Occupied vs. Renter-Occupied

Category	2000	2009	% Change 2000 to 2009
Total Housing Units	75,940	83,995	10.6%
Occupancy			
Occupied Housing Units	91.6%	88.8%	-2.8%
Vacant Housing Units Percent	8.4%	11.2%	2.8%
Tenure			
Owner-Occupied Housing Units Percent	56.4%	53.5%	-2.9%
Renter-Occupied Housing Units Percent	43.6%	46.5%	2.9%

Source: Census Data Comparison (2000 & 2009 Estimates data)

□ **Demand:**

➤ **Vacancies:**

There are 9,426 vacant units in the City of Columbus, and a combined vacancy rate of 11.2%. The rental vacancy rate is the highest at 7.8% and the homeowner’s vacancy rate is considerably lower at 2.7%. Non-rental units for sale account for 1.2% of all vacant units. On the basis of this salary analysis, the renter must work above and beyond 40 hours per week to meet the two-bedroom FMR affordability rate.

⁵ National Low Income Housing Coalition, “Out of Reach” 2010 Annual Data, <http://www.nlihc.org/>

➤ **Sales:**

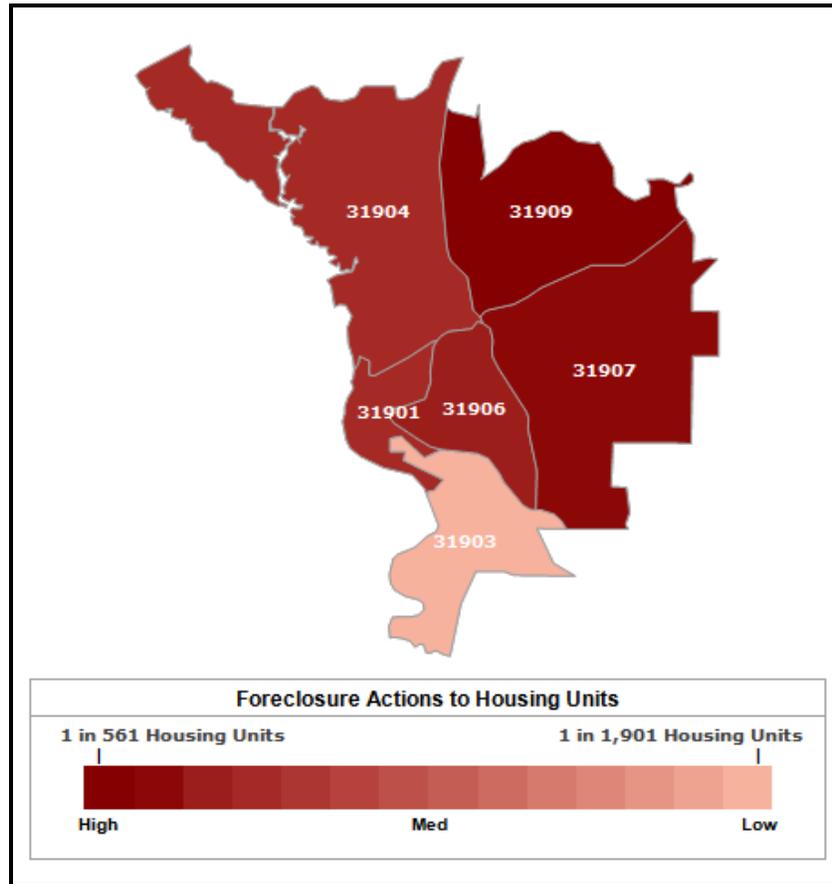
Sales of housing units in the City have continued to significantly decrease in the last year due to the impact of the housing market. According to Truila.com, the median sales price for homes in Columbus, Georgia for November, 2010 to January, 2011 was \$120,000. According to census estimates in 2009, the median sales price of new homes was \$133,700.

➤ **Foreclosures:**

The national housing market has experienced a catastrophic downfall due to the excess housing supply, lending disruptions, and high unemployment rates. Additionally, foreclosure rates have also increased due to the high quantity of sub-prime mortgages and adjustable-rate mortgages that were issued during the housing market boom.

Similar to other areas of the country, the City of Columbus has experienced a dramatic increase in foreclosure rates in the past two years. While the increasing number of foreclosures has had a negative impact on the City as a whole, for certain census tracts, the damage has been much more severe. According to the 2009 American Community Survey estimates, Columbus has 39,908 owner-occupied housing units of which 779 are in foreclosure as stated in Realty Trac's January 2011 Foreclosure data. A high percentage of foreclosure rates are located in the zip codes 31907 and 31909, which is consistent with the high percentages of low to moderate-income persons residing in these areas as shown in the following map.

Map 8: Foreclosure Actions to Housing Units



Source: January 2011 Realty Trac, www.realtytrac.com

□ **Housing Conditions:**

Housing conditions in the City are, in part, related to the age of the housing stock. A majority of the housing was built prior to 1989, [74.1%] of the total housing units. As management and maintenance continues to decline within older units, these units will continue to be unhealthy, unsafe, and continue to consume a large portion of the already constrained budget of low and moderate-income households for rising energy costs. Often the maintenance of these units is allowed to decline, resulting in concentrations of deteriorated housing in the City.

In 2009, approximately 2,750 of the housing units were sub-standard. Sub-standard conditions can include code violations, such as lack of plumbing, or kitchen facilities. Lack of heat, structural defects, lack of telephone service, and overcrowding are also prevalent code violations. Of all sub-standard units, over 70% require some type of rehabilitation. The remaining 30% are often uninhabitable. Thus, these units can only warrant demolition.

As would be expected, low and moderate-income homeowners and renters report the most housing problems. The older housing stock often becomes occupied by low to moderate-income populations, with a resulting further decline in maintenance. Because of income constraints, or low profitability, these units often continue to decline and are not repaired. Crime and vandalism may infiltrate areas that show disrepair. Housing may become so unhealthy that it can no longer be occupied.

□ **Cost of Housing:**

The cost of housing in City of Columbus has continued to increase over the recent years, as a result of the City's growing population. Housing costs factored as a percent of the Area Median Income has widely been utilized as a measure of affordability. Traditionally, a home is considered affordable when the costs consume no more than 30% of household income.

➤ **Owner Housing:**

In 2009, the median value for a home in Columbus was \$133,700, which is considered affordable for low to moderate-income households. Over 31% of the homes ranged between \$50,000 and \$99,999. The greatest number of homes (27%) fell within a range of \$100,000 to \$149,999. Housing cost has continued to increase due to the recent population increase. A little over 17% of all homes within the City cost over \$150,000 and up.

➤ **Rental Housing:**

The majority of rents ranged from \$500 - \$749 [31.9% of the City's renters]. The second highest rent paid in the City ranged from \$750 – \$999 [29.7% of the City's renters] which are typically newer units and have the potential to place significant burdens on low to moderate-income renters. The median rent for a unit in the City was \$729.

➤ **Persons with Disabilities & Elderly:**

As shown in the table below, the City of Columbus has several multi-family housing units that serve the elderly population and persons with disabilities. These units tend to offer rental assistance and housing credit programs funded by HUD. These units listed below have a combined 272 federally assisted units ready for occupancy in the City. Out of the total number of assisted units [272] in the City, [229] 84.1% are set-aside as HUD rental assistance units for the elderly and disabled.

Table 6: Columbus Housing Units for the Elderly and Disabled

PROPERTY NAME/ADDRESS	OCCUPANCY ELIGIBILITY	TOTAL UNITS	TOTAL ASSISTED UNITS	TOTAL UNITS DESIGNATED FOR ELDERLY	TOTAL UNITS DESIGNATED FOR THE DISABLED
Ashley Station II 2321 Olive Street Columbus, GA 31904-8600	Family	183	0	63	0
Calvary Community 7482 Old Moon Rd. Columbus GA, 31909-1705	Elderly & Disabled	108	108	108	10
Ralston Towers 211 12 th Street Columbus, GA 31901-2463	Elderly & Disabled	269	266	254	15
St. Mary's Woods Estates 4244 St. Mary's Road Columbus GA, 31907-6243	Elderly	48	48	48	0
TOTALS		608	422	416	25

HUD: MFH Inventory Survey of Units for the Elderly and Disabled,
<http://www.hud.gov/offices/hsg/mfh/hsgrent.cfm>

2. Number and Targeting Assisted by Local, State, or Federally Funded Programs:

Eligible clients currently assisted by CDBG and HOME Programs by the City's local non-profit agencies must have an annual income that does not exceed 80% of median income. First-time homebuyers must not exceed the 80% of median income figure.

3. Characteristics of the Housing Market's Influence on the Use of Funds Made Available for Rental Assistance, Production of New Units, Rehabilitation of Old Units, or Acquisition of Existing Units:

Through the CDBG and HOME Program, the Columbus Consolidated Government will continue to focus its goals on improving the availability and accessibility of affordable housing for the low to moderate-income community in targeted low-income areas of the City. By rehabilitating these homes, the current owners, many of whom are elderly, benefit from improved housing conditions and lower energy costs, and future owners will similarly benefit from a larger stock of affordable homes from which to choose. The larger housing

stock will help to keep housing costs down. Also, safety in many communities will be improved as the better community appearance reduces criminal activity.

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.

Columbus Consolidated Government's 5-Year Strategic Plan Specific Housing Objectives response:

1. Priorities and Objectives:

Increasing affordable housing was rated as the highest priority need for City of Columbus due to the burden it places on low and moderate-income residents. Sub-standard housing, in addition to the health and safety hazards it presents, can cause a cost burden on residents with limited resources. Homes are expensive to maintain, especially for senior citizens on a fixed income.

This need is readily addressed with Consolidated Plan resources by working in conjunction with private contractors and non-profit agencies that have the capacity and are qualified to make long-term renovations. Grants make this process economically feasible for residents at all financial levels, as these grants do not require repayment. Home repairs are consistently rated as a top priority at public hearings and meetings.

DECENT HOUSING

Goal

Increase the availability, sustainability, and accessibility of affordable housing for low and moderate- income residents, elderly, and disabled persons in the City.

Activities to include:

- ◆ Increase the number of affordable housing units in the City by providing down payment assistance for low and moderate homeownership
- ◆ Sustain low and moderate-income housing by continuing to provide emergency housing rehabilitation assistance for low and moderate-income persons and disabled and elderly persons.

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:

The City will anticipate using federal resources during the next five years in the following manner:

Table 7: Federal Resources

City of Columbus, GA		
	FFY2010 Funding Amount	Funding Estimate x 5 Years
CDBG Funds	\$1,989,970	\$9,949,850
HOME Funds	\$1,206,773	\$6,033,865
Total	\$3,529,343	\$17,646,715

* Based on FFY2010 levels of funding x 5 years.

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 of the Consolidated Plan to identify priority public housing needs to assist in this process.

Columbus Consolidated Government 5-Year Strategic Plan Needs of Public Housing response:

Counting both public housing units and housing units subsidized by Housing Choice Vouchers, the Housing Authority of Columbus [HAC] controls a total of 3,995 housing units. Of these, 1,666 are public housing (not voucher) units and are distributed among 6 developments. Additionally, 2,329 housing units are available through Low Income Housing Tax Credit (LIHTC) projects.

The housing authority was assessed in 2008 and received a score of 89 through the HUD Public Housing Assessment System and has been designated as a “standard performer”.

Table 8: Housing Authority of Columbus Inventory

Public Housing Inventory Housing Authority of Columbus		
	Public Housing	Housing Choice Vouchers
Total Units	1666	2319
% Occupied	93	98
% Disabled	15	11
% Minority	90	97
% Black	89	95
% Hispanic	0	1
Total Persons Housed	3492	6640
Months Waiting	5	11
Months Since Move-In	75	57

Source: http://www.huduser.org/portal/picture2008/form_7PH_name4.odt

The City does not anticipate losing any housing units from the public housing inventory during the FFY 2012-2016 Consolidated Plan period.

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))

Columbus Consolidated Government's 5-Year Strategic Plan Public Housing Strategy response:

1. Public Housing Agency's Strategy:

The Housing Authority of Columbus (HAC) is an entity distinct from the City having a separate Board of Directors and Executive Director. Despite their separate organizational structures, the Housing Authority of Columbus serves low-income residents of Columbus. The mission for the Housing Authority of Columbus is dedicated to creating, providing and increasing high quality housing opportunities to residents through effective and responsive management and responsible stewardship of public and private funds.

- Meeting the Needs of Families Served by the Authority: The downturn in the area's housing market has resulted in unique opportunities for the HAC to revitalize existing housing at significantly lower costs. Such revitalizations will increase the sustainability of affordable housing options and increase opportunities available to families currently living in public housing, as well as voucher holders, and families on the programs' waiting lists.
- Addressing Revitalization and Restoration Needs: Creative leveraging opportunities and partnerships with private developers are making possible the demolition of HAC's oldest and most obsolete units and the reconstruction of mixed-use, mixed-income communities and a senior housing.
- Improving the Living Environment of Residents: The Authority's commitment to improving affordable housing and rehabilitating existing housing units provide a framework which contributes to an improved living environment for low-income residents in Columbus.

2. Public Housing and Activities:

The Housing Authority of Columbus has expanded its leveraging of CDBG funds by establishing local partnerships and improving the standard and quality of life for low and moderate-income residents in the City. The Authority has successfully revitalized several public housing complexes utilizing a variety of local, state, and federal funding sources.

3. Financial Assistance to Poorly Performing Public Housing Agencies:

The Housing Authority was assessed in 2008 through the HUD Public Housing Assessment System and has been designated as a "standard performer".

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.

Columbus Consolidated Government’s 5-Year Strategic Plan Barriers to Affordable Housing response:

1. Cost of Housing or the Incentives to Develop, Maintain, or Improve Affordable Housing:

The City’s housing market presents significant impediments to developing an adequate supply of affordable housing for low to moderate-income people. The recent economic downturn, coupled with high rates of foreclosed homes in the City has created a significant barrier to affordable housing. The City’s Analysis of Impediments [AI] to Fair Housing Choice examined a number of areas in which barriers to the development of affordable housing might exist. The areas examined included:

- ❑ Limited Supply of Affordable Housing
- ❑ Lack of Fair Housing Education
- ❑ Establishment of Zoning and Ordinances in regards to affordable housing
- ❑ Limited access and availability of public transportation

2. Strategy to Remove or Ameliorate Negative Effects of Public Policies that Serve as Barriers to Affordable Housing:

The Annual Action Steps, which have become part of the annual CAPER submission to HUD, describe the activities that the City’s CDBG program has carried out to overcome Impediments to Fair Housing which include:

- ❑ Increase the Number of Non-Profit Developers;
- ❑ Provide Technical Assistance and Community Education;
- ❑ Seek Out Public Partnerships;
- ❑ Conduct a Community-Wide Fair Housing Forum;
- ❑ Continue to Monitor Annual HMDA data;

- Seek to establish an organization to promote and monitor Fair Housing programs in Columbus.

However, the high costs of land and exorbitant number of foreclosed homes in the City make the development of affordable housing a continued challenge. The City will continue to carryout the above strategies to reduce barriers to affordable housing.

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 IA. 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.

Columbus Consolidated Government's 5-Year Strategic Plan Homeless Needs response:

A point-in-time (PIT) count was conducted by the Columbus-Muscogee/Russell County Continuum of Care on January 27, 2010. The unsheltered count in 2010 was unsuccessful so 2009 numbers were used.

The PIT identified 468 homeless persons in the city, of which 141 persons were chronically homeless.

- 351 of those homeless were single individuals and persons in households without children,
- 34 families with children were counted, accounting for 117 individuals,
- 141 people were considered to be chronically homeless,
- 30 were identified as being severely mentally ill,
- 126 were identified as being chronic substance abusers,
- 62 were veterans,
- 16 were identified as persons with HIV/AIDS, and
- 50 were victims of domestic violence.

The chart on the next page further differentiates the homeless between those who are sheltered (whether in Emergency or Transitional housing) from those unsheltered.

Table 9: Continuum of Care Homeless Population and Subpopulations Chart

Homeless Population	Sheltered		Un-sheltered	Total
	Emergency	Transitional		
1. Homeless Individuals	146	57	148	351
2. Homeless Families with Children	15	2	17	34
2a. Persons in Homeless with Children Families	55	6	56	117
Total (lines 1 + 2a)	201	63	204	468
Homeless Subpopulations	Sheltered		Un-sheltered	Total
1. Chronically Homeless	56		85	141
2. Severely Mentally Ill	12		18	30
3. Chronic Substance Abuse	97		29	126
4. Veterans	38		24	62
5. Persons with HIV/AIDS	7		9	16
6. Victims of Domestic Violence	32		18	50
7. Youth (Under 18 years of age)	0		0	0

Lack of Affordable Housing- Most homeless persons do not earn enough to cover their basic needs, such as food and clothing, while others have very-low incomes, just enough to sustain themselves. Paying a mortgage or market rate rent would be impossible in their economic condition. In Columbus, an annual income of \$26,520 is needed to afford a two-bedroom apartment, and minimum wage employees are required to work 70 hours per week to afford the same Fair Market Rate unit.

Insufficient Income- The most significant factor facing households when considering housing affordability and availability is income. The median household income (MHI) for residents of Columbus, as reported in the US Department of Housing and Urban Development for 2010 was \$51,800⁶.

Inadequate Services- Chronic homeless people often have to deal with physical or mental disabilities, physical or mental illness, alcohol and drug abuse, or domestic violence. According to the 2000 Census, over 16,935 persons (9.09%) in Columbus had a physical disability, 15,581 (8.36%) had a work disability, 9,671 (5.19%) had a mental disability, 7,362 (3.95%) had a sensory disability, and 5,013 (2.69%) had a self-care disability. There were nearly 37,083 (19.9%) disabled people in the City in 2000. The chronic homeless in Columbus also have to deal with the lack of a detoxification program for persons with a substance abuse problem.

**Note – 2006-2008 ACS Census Estimates do not record this information. The most current information available is 2000 Census data.*

⁶ HUD 2010 Median Family Incomes, Muscogee County FMR <http://www.huduser.org/il>

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 IA, 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.

Columbus Consolidated Government's 5-Year Strategic Plan Priority Homeless Needs response:

1. Homeless and Homeless Prevention Priorities:

In 2010, the City of Columbus adopted a 10-Year Plan to End Homelessness. The Plan was prepared by Columbus State University's Cunningham Center for Leadership Development in partnership with the City of Columbus' Task Force on Homelessness. Through the combined efforts of elected officials, service providers, business leaders, government agencies, and the residents of Columbus to provide those at-risk of homelessness the tools needed to achieve employment, locate transportation, affordable housing, education and medical care, and to develop basic living skills, homelessness in Columbus will end within 10 years.

The 10-Year Plan establishes seven strategic initiatives necessary for success; these initiatives represent the City's priority homeless needs that were developed in extensive consultation with community stakeholders and are based on the highest quality data available. Development of the strategic initiatives was guided by the City's Task Force on Homelessness, a group appointed by the City Manager and including homeless service providers, business leaders, local elected officials, city employees, and others with an interest in helping those experiencing homelessness. The Task Force's process included interviews and discussions with homeless persons. Data used to inform the Plan came from local Point-In-Time counts in 2009 & 2010, service figures from local homeless service providers, eviction and arrest records, and school system databases.

Initiatives of the City of Columbus' 10-Year Plan to End Homelessness:

- Initiative 1: Funding
- Initiative 2: A Coordinated and Collaborative Effort among Service Providers
- Initiative 3: Develop and Operate a Central Intake and Resource Facility
- Initiative 4: Rapid Re-Housing into Transitional and Permanent Supportive Housing
- Initiative 5: Transportation
- Initiative 6: Prevention and Intervention Programs
- Initiative 7: Job Training and Services

According to the City's 10-Year Plan, the homeless service delivery system does contain certain gaps, primarily in the fragmentation of services between provider agencies. Intake forms and processes are not standardized and short-term solutions may become prized over long-term solutions due to pressure from board members and funders to show near-term results. These factors can result in inconsistencies between programs causing cases not to be managed holistically. Action steps to address these gaps are proposed under Strategic Initiative 2: "A Coordinated and Collaborative Effort among Service Providers".

2. Chronic Homelessness:

Columbus homeless service providers estimate that Columbus' population of chronically homeless persons exceeds the national average (nationally, 10% of all homeless persons are estimated to be chronically homeless).⁷ Chronically homeless persons are more likely to have mental health or substance abuse problems and, thus, consume a greater share of both homeless and general community resources, as depicted in the figure below (taken from the 10-Year Plan). The City's Plan places a high priority on the rapid placement of chronically homeless persons into permanent supportive or transitional housing so as to free the provider network's resources to focus on resolution of non-chronic homeless cases. This priority will require development of appropriate housing options as well as a detoxification program to treat chronically homeless persons before placing them in housing.

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 IA. 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.

⁷ 10-Year Plan to End Homelessness.

Columbus Consolidated Government’s 5-Year Strategic Plan Homeless Inventory response:

A summary list of shelters and housing programs, with the specific populations they serve, appears below.

Table 10: City of Columbus Housing Inventory - Homelessness Programs

Housing Type:	Emergency Shelter	Transitional Housing	Permanent Supportive Housing
Total Year-Round Beds - Household <i>without</i> Children			
Current Year-Round Beds	141	133	62
Number of DV Year-Round Beds	3	0	0
Non-DV Year-Round Beds	138	133	62
New Year-Round Beds	0	28	0
Under Development Year-Round Beds	0	0	0
Total Year-Round Beds - Households <i>with</i> Children			
Current Year-Round Beds	83	0	8
Number of DV Year-Round Beds	40	0	0
Non-DV Year-Round Beds	43	0	8
New Year-Round Beds	0	0	0
Under Development Year-Round Beds	14	0	0
Total Year-Round Beds - All Household Types	224	133	70

Source: Columbus-Muscogee/Russell County CoC – 2010 Housing Inventory Chart

Below is a list of emergency shelters, transitional housing, and permanent supportive housing that compose the Continuum of Care:

Table II: Continuum of Care Shelter List

EMERGENCY SHELTERS	
Organization	Name of Program/Shelter
Crisis Center of Russell County	Crisis Center of Russell County
Hope Harbour	Hope Harbour
Salvation Army	Salvation Army
House of Mercy	House of Mercy
Valley Interfaith Promise	Valley Interfaith Promise
Valley Rescue Mission	Damascus Way
Valley Rescue Mission	Valley Rescue Mission
TRANSITIONAL HOUSING	
Organization	Name of Program/Shelter
House of Restoration	House of Restoration
House of TIME	House of TIME
Open Door Community House	Transition Home for Women
PERMANENT SUPPORTIVE HOUSING	
Organization	Name of Program/Shelter
New Horizons Community Service Board	Horizons Place (S+C)
New Horizons Community Service Board	Veteran's Parkway
New Horizons Community Service Board	Willow Glen
Stewart Community Home	Stewart Community Home

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 I 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.

Columbus Consolidated Government’s 5-Year Strategic Plan Homeless Strategic Plan response:

I. Homelessness

Increasing the amount of permanent housing with supportive services has been identified as a top priority for the City of Columbus. The majority of chronically homeless persons have severe mental illness and/or substance abuse issues. They require long-term, affordable housing options with supportive services in order to make the transition to residential stability. In addition to permanent affordable housing, the City’s strategy for ending chronic homelessness addresses each of the issues that most often cause this problem:

- the high prevalence of substance abuse among some homeless individuals
- inadequate education and/or job skills among many homeless persons
- the shortage of affordable housing in the City of Columbus

The City will maintain coordination and collaboration with local non-profit agencies serving the homeless population. The City will implement a HMIS database to track the effectiveness of service providers. This system provides information on services provide to eligible clients by local non-profit organizations in the City. The City will also work with service providers to identify any gaps in services, any duplication of services, and schedule regular meetings that allow homeless service providers to more efficiently serve the homeless population.

Providing a central intake and resource facility is an imperative part to the City’s strategy to end homelessness. The “One-Stop-Shop” service facility will allow service providers to assess the needs and identify services such as housing, case management, and medical

services. This central facility will help to eliminate duplication among local non-profits during the intake and assessment procedures and in housing and supportive services.

The City will also provide transitional and permanent supportive housing to homeless persons in the City by supporting rapid re-housing programs. This approach will allow case management and housing services to be provided simultaneously so that persons at-risk of becoming homeless and persons with mental and physical needs can remain stably housed when exiting a transitional housing program. Prevention programs such as rent/utility assistance, foreclosure counseling, and case management will be used to reduce homelessness in Columbus.

The City will initiate development of a detoxification unit for persons who are homeless or at-risk for becoming homeless due to substance abuse. The City will also develop programs to help persons overcome the circumstances that prevent them from obtaining housing or employment such as mental illness, criminal history, and credit problems, as well as provide further education and job training skills to improve the opportunities for employment for the homeless and at-risk population.

2. Chronic Homelessness:

The strategies outlined below [The City of Columbus' 10-Year Plan to End Homelessness] will be incorporated into the City's FFY 2012 -2016 Consolidated Plan and FFY 2012 Action Plan:

The 10-Year Plan to End Homelessness addresses the greatest causes of chronic homelessness such as substance abuse, mental illness, and lack of employment opportunities. According to the City of Columbus' Point In Time [PIT] Count conducted in 2010, 30% of the homeless population is categorized as chronically homeless. The City will provide funding to non-profit organizations to initiate permanent supportive housing programs to reduce chronic homelessness. For this to be successful, the development of a detoxification center is crucial to reducing chronic homelessness, as persons are sometimes required to be drug-free prior to entering a permanent supportive housing program.

The City's 10-Year Plan is geared towards providing supportive housing, immediate triage, and assessment to prevent persons from becoming chronically homeless.

As addressed in the Continuum's Exhibit I Application, Columbus plans to add 22 new permanent housing beds for the chronic homeless population over the next 10 years. Also, New Horizons, a non-profit who serves persons with mental illness, developmental issues and substance abuse problems, will continue to collaborate with the Columbus Housing Authority to create 35-40 new permanent housing beds for chronic homeless persons.

3. Homelessness Prevention:

The City recognizes a need for neighborhood-based homelessness prevention programs, such as crisis response and stabilization team, a street outreach program, housing search

and placement specialists, and increased employment opportunities that provide temporary rental assistance and other services.

The following action items comprise the City's strategy for homelessness prevention:

1. Development of a detoxification unit for persons in danger of becoming homeless;
2. Development of programs and systems that help overcome barriers to housing and employment;
3. Provide childcare;
4. "Agreement of Discharge" memorandums;
5. Design of an intervention and eviction prevention program;
6. Rental and utility assistance payments;
7. Implementation of a referral and outreach team;
8. Development of a reunification program;
9. Foreclosure intervention and prevention program;
10. Encourage participation in national healthcare plan;
11. Establish a critical document fund;
12. Expand and update homeless resource guides;

4. Institutional Structure:

The City's various providers of services to persons who are homeless make up a Continuum of Care, coordinated by the Homeless Resource Network. The Continuum covers Columbus/Muscogee County as well as neighboring Phenix City and Russell County in Alabama. The mission of the Homeless Resource Network is to partner with the community to provide solutions to homelessness and, since 1995, the organization has organized and prepared the annual submission of the Continuum of Care plan to HUD. The Homeless Resource Network is the primary source of leadership on issues concerning homelessness in the City and members of the collaborative organization include non-profit organizations, for-profit organizations, faith-based organizations, government agencies and individuals.

In developing the 10-Year Plan, new organizations and partners were introduced to further broaden the resources available to fight the causes of homelessness. This primarily includes the Homeless Task Force appointed by the Columbus City Manager. With the completion of the 10-Year Plan, this organization will transition into an implementation role, by assembling a Board of Directors, incorporating and receiving tax-exempt status, and hiring an Executive Director, who would then hire a staff. This new organization would be charged with the implementation of the 10-Year Plan's action items and would serve as a single entity to receive and coordinate any public funds allocated for homelessness issues in the City.

5. Discharge Coordination Policy:

Included as an action item under Initiative 6: "Prevention and Intervention Programs", is a strategy for greater coordination in discharge planning to prevent discharges into

homelessness. The Plan calls for “Agreements of Discharge” memorandums to be in place with the City, crisis units, hospitals, courts, the City Attorney, jails, and the Department of Family and Children Services.

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.

Columbus Consolidated Government’s 5-Year Strategic Plan ESG response:

Columbus Consolidated Government does not receive ESG Entitlement funds; therefore, this section does not apply.

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.

Columbus Consolidated Government’s 5-Year Strategic Plan Community Development response:

I. Priority Non-Housing Community Development Needs:

During the Strategic Planning Process for the 2012-2016 Consolidated Plan, the survey

results revealed the most pressing non-housing issues in the community were the needs to continue supporting public services, increase improvements and accessibility to public facilities, increase Fair Housing Activities, and planned repayment of Section 108 Loan Principle.

Continue Supporting Services for Low and Moderate Income Persons

The priority goal to continue supporting services for low and moderate-income families and individuals residing in Columbus-Muscogee County will be addressed by funding non-profit agencies through CDBG for services to low and moderate-income persons.

Increase Improvements and Accessibility

The priority goal to increase improvements and accessibility for special population groups such as the elderly and persons with disabilities residing in Columbus-Muscogee County. Public Facility projects are limited to those that serve the general public due to limited resources available. By increasing improvements and accessibility to public facilities, the City will improve infrastructure to meet health and safety standards.

Planned Repayment of Section 108 Loan

The City will repay principle and interest on its Section 108 Loan that was used in the construction of the TSYS campus, expanding economic opportunity for low and moderate income persons.

Economic Development

Over the next Consolidated Plan period, the Columbus Consolidated Government will continue to work with the Regional Economic Development Agency, The Valley Partnership, to address the needs of existing employers, foster economic development, and encourage the creation and retention of jobs for low and moderate-income persons in the City.

2. Basis for Assigning the Priority:

The City has developed these priorities in response to the non-housing community development needs of its residents. The needs to be addressed have been identified through a Needs Assessment Survey of residents and social services agencies, local community and neighborhood meetings, and in various Public Hearings.

The City has made a local decision to utilize CDBG funding to repay a Section 108 loan principle. The most pressing needs are for affordable housing for all residents, supportive services, and to create suitable and safe living environments.

3. Obstacles to Meeting Underserved Needs:

- ❑ Lack of financial resources of non-profits to meet growing needs of Columbus-Muscogee County residents.
- ❑ High costs of services for individuals with special needs
- ❑ Deteriorating infrastructure in older sections of the City.

- Rising costs of rehabilitation of homes

4. **Specific Long-term and Short-term Community Development Objectives:**

Long-Term

1. To provide the funding necessary for non-profit organizations to improve the City's public services capabilities.
2. To promote job creation for low and moderate-income persons by providing repayment of Section 108 Loan
3. To provide for the rehabilitation of deteriorated housing units in the City and improve health and safety standards of residents of Columbus-Muscogee County.
4. To provide the administrative structure to plan and conduct community development activities and carry out housing and homeless activities by planning, implementing, monitoring and evaluating housing and homeless programs

Short-Term

1. To improve existing deteriorated infrastructure in low and moderate-income areas to meet health and safety standards.
2. To provide funding or technical assistance to assist in the implementation of programs for special population groups such as the elderly, persons with disabilities,
3. To provide funding or technical assistance to private non-profit and public agencies meeting the public service needs of the City's low and moderate-income population.

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.

Columbus Consolidated Government’s 5-Year Strategic Plan Antipoverty Strategy response:

I. Describe the Actions that will Take Place During the Next Year to Reduce the Number of Poverty Level Families

The City will continue to increase its efforts to implement anti-poverty strategies for the citizens of the Columbus-Muscogee County over the next five years. The City will strive to increase its efforts in assisting homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low to moderate-income residents.

The City will continue to provide assistance to low and moderate-income residents through the following initiatives:

- Provide non-profit organizations such as Urban League, Habitat for Humanity, Columbus Housing Initiative, Wynnton Neighborhood Housing and the Fourth Street Towers to address housing needs for families at or below poverty level;
- Provide assistance to the non-profit organizations such as NeighborWorks Columbus, Wynnton Neighborhood Housing, and the Columbus Area Habitat for Humanity to acquire and construct affordable rental housing for low-income residents;
- Continue Project Care to improve the accessibility for disabled persons and seniors;
- Provide Down Payment Assistance to low-income families;
- Provide homeowners with housing repair assistance through the Housing Rehabilitation program;
- The City will continue to implement a Section 3 policy as necessary. Additionally, the county will encourage non-profit organizations to expand housing development programs to incorporate job-training opportunities as a part of their operations.

Through the initiatives described above, and in cooperation with the agencies and non-profit organizations noted, the City will continue to assist low and moderate-income residents of Columbus-Muscogee County over the next five years.

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

- I. (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.

Columbus Consolidated Government’s 5-Year Strategic Plan LIHTC Coordination response:

This section is for State Consolidated Plans 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.

Columbus Consolidated Government 5-Year Strategic Plan Non-homeless Specific Special Needs Objectives response:

I. Specific Special Needs Priorities and Objectives:

During the Strategic Planning Process for the FFY2012-2016 Consolidated Plan, the research revealed the most pressing non-homeless special needs issues in the community were the need to support services for low and moderate-income persons. Columbus' Priority Need #4: "Continue Supporting Services for low and moderate-income persons" will address the jurisdiction's non-homeless special needs.

Continue Supporting Services for Low and Moderate-Income Persons

The priority goal is to continue to support public services for low and moderate-income non-homeless persons with special needs. Program funds will be allocated to non-profit organizations allowing them to leverage federal funds provided from the City with other resources to expand their current services.

2. Federal, State, and Local Public and Private Sector Resources

The City expects to apply substantial federal resources from the CDBG Program to these issues. Over the five years covered by this Plan, the funds expected from this source will total over \$9.9 million. Combined with the resources of such community-based organizations as HOPE Harbour and the New Horizons Community Service Board, mental health, shelter and supportive housing programs for special needs populations will be available.

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 IB) 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.

Columbus Consolidated Government 5-Year Strategic Plan Non-homeless Special Needs Analysis response:

1. Number of Persons in Various Subpopulations that are Not Homeless but May Require Housing or Supportive Services:

According to the U.S. Substance Abuse and Mental Health Services Administration, 7.4% of the total U.S. population are abusers of alcohol while 8.3% were users of illicit drugs. Applying these percentages to Columbus' population provides a rough idea of the scale of these problems: an estimated 14,090 Columbus residents are abusers of alcohol; an estimated 15,804 residents used illicit drugs. The percentage of persons in the City age 65 and over (elderly) was 11.7%, based on 2009 American Community Survey estimates. Using the same dataset, 5.6% of the county's population was frail elderly, age 75 and over. Statistics from the Centers for Disease Control and Prevention, Division of HIV/AIDS Prevention-Surveillance and Epidemiology show that 0.2% of Georgians were living with an AIDS diagnosis in 2008. This would equate to approximately 380 current AIDS in Columbus. This statistic may vastly underreport the number of HIV/AIDS cases because consensus holds that many cases of HIV/AIDS go undiagnosed.

2. Priority Housing and Supportive Service Needs of Person who are Not Homeless but May or May Not Require Supportive Housing:

The primary housing needs of these subpopulations (older adults, people with disabilities, mental illness, or AIDS, and at-risk youth) include affordable, accessible housing for seniors, home maintenance assistance programs, and accessible accommodations for persons with disabilities. The primary supportive service needs of these populations are for wraparound services provided in conjunction with their housing, often including intensive case management.

3. Basis for Assigning the Priority:

Considering the full range and wide variety of other important needs within the jurisdiction, Columbus places a medium priority on all non-homeless special needs. This level of priority reflects resident input received in public meetings and workshops, stakeholder interviews, and the needs assessment survey.

4. Obstacles to Meeting Underserved Needs:

The biggest obstacle to serving the special needs population is the lack of resources due to the high cost of supportive services required for the special needs population.

5. Facilities and Services that Assist Persons who are Not Homeless but Require Supportive Housing:

Hope Harbour serves victims of domestic violence with emergency shelter and services for victims in the Chattahoochee Judicial Court System. New Horizons Community Services Board provides services for persons with mental illness, developmental disabilities, or substance abuse problems. These programs range from less restrictive outpatient medical services to more intensive managed group homes. Through the Project Care Program, the City of Columbus gives emergency assistance with HOME funds to elderly or disabled individuals with minor emergency repairs needed on their homes.

The Columbus Housing Authority also offers housing at 3 different communities for the elderly and disabled, George R. Rivers (24 1 bedroom apartments), E.J. Knight Gardens (40 1 bedroom apartments), and Nicholson Terrace (100 efficiency apartments).

6. Identify HOME or Other Tenant Based Rental Assistance to Assist One or More of these Subpopulations:

The Columbus Consolidated Government does not anticipate using HOME funds other tenant based rental assistance to provide assistance to low and moderate-income renters in the City.

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 10-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.

Columbus Consolidated Government's 5-Year Strategic Plan HOPWA response:

Columbus Consolidated Government is not a direct recipient of the Housing Opportunities for Persons with HIV/AIDS (HOPWA) program.

Specific HOPWA Objectives

- I. 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.

Columbus Consolidated Government's 5-Year Strategic Plan Specific HOPWA Objectives response:

Columbus Consolidated Government is not a direct recipient of the Housing Opportunities for Persons with HIV/AIDS (HOPWA) program.

Other Narrative

Columbus Consolidated Government's 5-Year Strategic Plan Other Narrative response:

The Columbus Consolidated Government utilizes the recapture method for HOME programs in accordance with 24 CFR 92.254[a][4].

Recapture Provisions [24 CFR 92.254[5]]

The Recapture Provisions will ensure compliance with the "Period of Affordability" requirements in 24 CFR 92.254[a][4].

Recapture Provisions [24 CFR 92.254[5][ii]

If a homeowner chooses to sell or use the property for non-eligible HOME Program activities, the full amount of the HOME Program funding assistance that enabled the homebuyer to buy the unit [excluding the amount used for the development subsidy, the cost difference between producing the house and its fair market value] for this activity shall be recaptured and repaid to the Columbus Consolidated Government's Department of Community Reinvestment provided that net proceeds are sufficient. If net proceeds are insufficient to repay the total HOME investment due, only the net proceeds will be recaptured. In the event of foreclosure, when no net proceeds are available, no recapture provision is applicable.

Consolidated Plan Citizen Participation Plan Columbus Consolidated Government

The objectives and procedures of the City of Columbus for meeting the Citizen Participation Plan requirements of the U.S. Department of Housing and Urban Development (HUD) for the Consolidated Plan are set forth below.

- I. It is the policy of the City of Columbus to give citizens timely notice of local meetings and reasonable and timely access to local meetings, information, performance reports, and records relating to the City's proposed and actual use of Community Development Block Grant, HOME Investment Partnership funds other HUD grants administered by the City.

Procedures

- A. Official notice of public meetings will be posted at least 72 hours in advance with the Clerk of Council of the City of Columbus, Columbus Government Center, 100 10th Street, Columbus, Georgia 31901.
- B. Notice of public hearings will be published in the Columbus Ledger-Enquirer, Columbus Times, City of Columbus Webpage and CCG-TV (Government Access Channel) prior to the hearing date.
- C. A statement indicating when the plan may be reviewed and contact information to comment on the plan will be published in the Columbus Ledger-Enquirer, Columbus Times, City of Columbus Webpage and CCG-TV (Government Access Channel) prior to the public hearing.
- D. Information that may be reviewed includes, but is not limited to:
- i. Amount of grant funding and program income anticipated in the coming year or amount of previous year funding if HUD has not released the allocated amounts.
 - ii. Range of activities that may be undertaken.
 - iii. Estimated amount of grant funding and program income proposed based upon previous years funding, if HUD has not released the allocated amounts, to be used for activities that will benefit low and moderate-income persons.
 - iv. Any proposed activities likely to result in displacement and the City Columbus' plan for minimizing displacement.
- II. It is the policy of the City of Columbus to take reasonable steps to provide technical assistance to groups' representative of persons of low and moderate-income that request assistance in developing proposals.

Procedures

- A. Groups representing persons of low and moderate-income who are interested in receiving technical assistance may write or call the City of Columbus, Department of Community Reinvestment, 420 10th Street (The CCG Annex Building, 2nd Floor), Columbus, Georgia 31901. Calls can be made to the department at 706-653-4613.
 - B. An assessment of the type and extent of technical assistance needed by the representative group will be made by City staff upon request and in a timely manner.
 - C. The City will make a good faith effort to see that reasonable requests for technical assistance are responded to in a timely manner.
- III. It is the policy of the City of Columbus to hold public hearings for the purpose of obtaining the views of citizens and responding to proposals and questions.

Procedures

- A. One public hearing to obtain the views of citizens on community development and housing needs will be held by the Department of Community Reinvestment prior to publication of the Consolidated Plan for public comment.
 - B. Other public meetings may be held as necessary.
 - C. The hearings will address community development and housing needs, development of proposed activities, and review of program performance.
 - D. The public hearing will be held in the Government Center Annex, 420 10th Street. This site is equally accessible to all sections of the city. It is anticipated that these factors will enhance citizen participation.
 - E. Reasonable accommodation for the physically challenged will be provided at public hearing sites. At least 48 hours (two complete business days) advance notice is required.
 - F. Comments received during the public comment period and at public hearings will be incorporated into the Consolidated Plan.
- IV. It is the policy of the City of Columbus to take reasonable steps to assist non-English speaking residents to be able to understand and participate in discussions that take place at public hearings, when a significant number of non-English speaking residents can reasonably be expected to attend.

Procedures

- A. Anyone anticipating that the effectiveness of the public hearing will be significantly reduced because of English language limitations should contact the City of Columbus, Department of Community Reinvestment as far in advance of the public hearing as possible.
 - B. At least 48 hours (two complete business days) advance notice is required.
- V. It is the policy of the City of Columbus to provide citizens with reasonable advance notice of and opportunity to comment on proposed activities not previously included in the Consolidated Plan and any proposed deletion or other substantial change to the activities.

Procedures

- A. If the proposed Consolidated Plan is approved and it subsequently becomes necessary to substantially change the program content, a formal amendment process will be followed.
 - i. A public hearing will be held.
 - ii. Reasonable advance notice of the date, time, and place of the public hearing will be made available to the public.
 - iii. The nature of the proposed change(s) will be described in sufficient detail to allow citizens to determine if they are affected and desire to comment on the proposed change.
- B. “Substantial Change” is defined to be:
 - i. A proposed new activity which cannot reasonably be construed to have been included within the programmatic intent of the adopted application or in the commitment of funds to a specific project creating a budget change in excess of \$500,000; or
 - ii. An activity that was identified in the adopted application, but which subsequently is proposed to be deleted; creating a budget change in excess of \$500,000; or
 - iii. An activity that is proposed to be altered in terms of its purpose, scope, location, or beneficiaries to such an extent that it can no longer reasonably be construed as the activity reviewed by the public and approved by the Columbus City Council creating a budget change in excess of \$500,000;
- C. The criteria to be used in determining if an activity is at risk of becoming substantially changed from its originally intended purpose will be based upon further Columbus City Council actions to modify/amend the Consolidated Plan proposed activities.

- D. City staff shall proactively monitor each funded project for compliance with its respective performance criteria and provide periodic progress reports to the City Council.
 - E. Any activity that is judged to be at risk of substantially changing from its originally intended purpose, scope, location, or beneficiaries will be reviewed in a public hearing forum prior to a decision by the City Council as to whether the performance objectives of the project shall be amended.
- VI. It is the policy of the City of Columbus to take reasonable steps to address concerns expressed by citizens and to respond to any formal complaints or grievances in a timely manner.

Procedures

- A. Citizens are urged to bring any concerns they may have regarding the Consolidated Plan to the attention of the City of Columbus, Department of Community Reinvestment, by calling 706-653-4613. It is anticipated that most concerns can be quickly and successfully addressed through direct conversation.
- B. Unresolved issues, complaints, or grievances may be formally submitted to the following address:

City of Columbus
Department of Community Reinvestment
420 Tenth Street
Columbus, GA 31901
- C. In order for the City to be able to respond effectively, any formal complaint or grievance must be in writing and follow the procedures shown below:
 - i. It must be legible – typed correspondence is strongly urged.
 - ii. It must be signed, dated, and indicate if the correspondent is representing his/her personal concerns or those of a larger group, in which case, the name and description of the group must be stated.
 - iii. It must clearly identify the specific complaint or grievance and should state what corrective action is being sought.
- D. The City will provide timely written answers to written complaints and grievances. The time required to respond may vary depending upon the nature and complexity of the specific complaint. Where practicable, written answers will be provided within 15 working days of the receipt of the written complaint.

VII. It is the policy of the City of Columbus to encourage citizen participation, particularly by low and moderate-income persons who reside in the areas for which grant funding is proposed to be used.

Procedures

The City of Columbus has implemented a Community Development Advisory Council consisting of citizens who are appointed for a two-year term by City Council to review and approve the annual budgets for that CDBG and HOME entitlement funds.

- A. Reasonable notice will be given to the general public at appropriate times as the details of the proposed use of grant funding is identified.

- B. After specific proposals are received and evaluated and, additional citizen participation procedures have been implemented. The specifics of these procedures may vary from project-to-project in order to respond to unique circumstances. The general process will be as follows:
 - i. Identify the geographic boundaries of the area most likely to be affected by the proposal and the principal organizations known to represent or otherwise be affiliated with the low and moderate-income residents.

 - ii. Proactively communicate the purpose of and means by which grant funding will to be used.

 - iii. Provide reasonable opportunities for low and moderate-income residents to ask questions and receive answers regarding how they might be affected by the proposed use of grant funding.

 - iv. Provide reasonable opportunities for non-profit organizations to obtain information regarding application for funding and notification of award.

SECTION 3 PLAN & CERTIFICATIONS
DEPARTMENT OF COMMUNITY REINVESTMENT
COLUMBUS CONSOLIDATED GOVERNMENT

Requirements for Compliance with Requirements of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C.1701u) (Section 3) Part 135 – Economic Opportunities for Low and Very Low-income Persons

Section 3 is a provision of the Housing and Urban Development Act of 1968, which recognizes that HUD funds are typically one of the largest sources of federal funding expended in communities through the form of grants, loans, entitlement allocations and other forms of financial assistance. Section 3 is intended to ensure that when employment or contracting opportunities are generated because a covered project or activity necessitates the employment of additional persons or the awarding of contracts for work, preference must be given to low and very low-income persons or business concerns residing in the community where the project is located.

Columbus Consolidated Government’s Policy Statement:

It is the policy of the Columbus Consolidated Government herein described as the “City”, will ensure that Equal Employment Opportunities be provided for all employees and applicants for employment regardless of race, color, religion, sex, national, origin, handicap, or economic status; and that through the award of contracts to contractors, subcontractors, vendors, and suppliers, the City will ensure that employment and business opportunities be created for residents of CDBG eligible income areas, residents in low and moderate-income census tracts and block groups, and other qualified low and very low-income persons residing in Columbus. The Columbus Consolidated Government intends to uphold its obligation to contractors, subcontractors, and vendors and incorporate practical initiatives of providing full-time permanent employment opportunities as well as business opportunities to low and moderate-income persons and other Section 3 eligible persons.

The City will ensure every effort to achieve the goals of the Section 3 and shall provide equal responsibility to its contractors, vendors, and suppliers to implement aggressive compliance efforts. The City will also evaluate contractors’ compliance towards achieving the goals of the Section 3 Plan and ensure a system of sanctions against contractors, vendors, or suppliers for non-compliance and initiate punitive steps to address any such concerns.

Definitions:

- Contractor shall mean any entity which contracts to perform work generated by the expenditure of Section 3 covered assistance, or for work in connection with a Section 3 covered project.
- Department or HUD shall mean the Department of Housing and Urban Development, including its Field Offices to which authority has been delegated to perform functions under this part.

- Employment Opportunities shall mean any opportunity generated by Section 3 covered assistance generated by the expenditure of Section 3 covered public and Indian housing assistance (to include: operating assistance, development assistance, and modernization assistance).
- Housing Development shall mean low-income housing owned, developed, or operated by public housing agencies or Indian housing authorities in accordance with HUD's public and Indian housing program regulations listed in 24 CFR Chapter IX.
- New hires shall mean full-time employees for permanent, temporary or seasonal employment opportunities.
- Recipient shall mean any entity which receives Section 3 covered assistance, directly from HUD or from another recipient and includes, but is not limited to, any State, unit of local government, PHA, IHA, Indian tribe, or other public body, public or private non-profit organization, private agency, or institution, mortgagor, developer, limited dividend sponsor, builder, property manager, community housing development organization, resident management corporation, resident council, or cooperative association.
- Section 3 shall mean Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).
- Section 3 business concerns are businesses that can provide evidence that they meet one of the following:
 1. 51 percent or more owned by Section 3 residents; **or**
 2. Permanent, full-time employees include persons, at least 30 percent of its fully time employees include persons that are currently Section 3 residents, or within three years of the date of first employment with the business concern were Section 3 residents; **or**
 3. That provides evidence, as required, of a commitment to subcontract in excess of 25 percent of the dollar award of all subcontracts to be awarded to business concerns that meet the qualifications in the above two paragraphs.
- Section 3 covered project shall involve the construction or rehabilitation of housing (including reduction of lead-based paint hazards), or other public construction such as street repair, sewage line repair or installation, updates to building facades, etc.
- Section 3 covered assistance shall mean:
 - Public and Indian housing development, operating or capital funds; **or**
 - Other housing assistance and community development assistance expended for housing rehabilitation, housing construction or other public construction projects, such as: CDBG, HOME, 202/811, Lead-Based Paint Abatement, etc.
- Section 3 Residents shall mean:
 1. Residents of Public and Indian Housing; **or**

2. Individuals that reside in Columbus in which the Section 3 covered assistance is expended and whose income do not exceed the local HUD income limits set forth for low or very low-income households.
- Service area shall mean the geographical area in which the persons benefiting from the Section 3 covered project reside. The Service Area shall not extend beyond the unit of local government in which the Section 3 covered financial assistance is expended.

Section 3 Preference:

The City will act in accordance with all Section 3 regulations and require contractors and subcontractors (including professional service contractors) to direct their efforts towards awarding contracts to Section 3 business concerns in the following order of priority:

1. Category 1
Business concerns that are 51% or more owned by residents of the housing development(s) for which work is performed, or whose fulltime, permanent workforce includes 30% of these persons as employees.
2. Category 2
Business concerns that are 51% or more owned by residents of Public housing developments other than the development(s) for which work is performed, or whose fulltime, permanent workforce includes 30% of these persons as employee(s).
3. Category 3
Business concerns that are designated HUD Youth-Build programs being carried out in Columbus.
4. Category 4
Other Section 3 Residents.

Section 3 Complaints:

Any Section 3 resident or Section 3 business (or authorized representative) seeking employment, training or contracting opportunities generated by Section 3 covered assistance may file a complaint with the City's Purchasing Department. All complaints must be submitted in writing to the Columbus Consolidated Government.

All complaints of non-compliance with the Section 3 Statute shall conform to the following requirements:

Complaints shall be filed in writing and shall contain the name, address, and phone number of the person filing the complaint, and a brief description of the alleged violation of the regulations;

Complaints shall be filed within thirty (30) calendar days after the complainant becomes aware of the alleged violation

In cases where concerned parties wish to have its complaint considered outside of the Authority, a Section 3 complaint may be filed with the Assistant Secretary for Fair Housing and Equal Opportunity Department (FHEO), Department of Housing and Urban Development, in Washington D.C., 20410. A complaint must be received no later than 180 days from the date of the action or omission upon which the complaints are based, unless the time for filing is extended by the Assistant Secretary.

Reporting:

The City will report sub-recipients' compliance with Section 3 to HUD throughout the fiscal year.