

The Consolidated Plan

**For Community Development Block Grant (CDBG) Funds
April 8, 2004**

Cleveland, Tennessee

2004-2009

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Executive Summary

Background

The City of Cleveland became a Department of Housing and Urban Development (HUD) Entitlement Community in 2004. This status results in an “entitlement” of HUD funds each year that is based on a HUD formula. The funds are allocated annually by the Cleveland Community Development Department, which is the lead agency.

The City must distribute the funds in accordance with a Consolidated Plan (CP). The CP includes a strategic plan and an annual action plan. The planning period for the CP is five years, from 2004 through 2009. The CP must be developed to achieve the following statutory goals, principally for low and moderate income households:

- Provide decent housing and
- A suitable living environment and
- Expand economic opportunities

Currently, the CDBG Entitlement is \$405,000. These are the sole HUD funds that are available to the City of Cleveland by formula. If this amount is projected over a five year period, the Plan has a budget of \$2, 025,000 at the city’s discretion.

The Process

The process used to develop the CP is one of inclusion and citizen participation. The process is controlled by a precursor of the CP, called the Citizen Participation Plan. This plan is included as an exhibit to the CP.

A public hearing was held March 25, 2004 at City Hall. The purpose of the meeting was to attain input on the community development and housing needs for the City of Cleveland. The meeting was well attended. Consultations took place with all major social service and housing providers on a one-on-one interview and by a survey instrument.

Data and input were analyzed and needs were prioritized. Strategies were developed that would address the prioritized needs.

Strategies

Homeless. The prioritized needs in the homeless population were the need for transitional and permanent housing. The objective is to create ten units of each over the five year planning period.

Support Services for the Non-Homeless. The prioritized needs for these services include services for the elderly, frail elderly, physically handicapped, and victims of substance abuse. The objectives are as follows:

- Increase support services for the elderly and the frail elderly by an additional 100 persons each.
- Facilitate the construction of 50 physically handicapped units over the planning period.
- Facilitate the construction of ten housing units for victims of substance abuse and corresponding services.

Affordable Housing. The prioritized needs for affordable housing include: large family household renters 0-30% of median income; elderly renters 0-50 % of median income; and homeowners 0-50% of median income. The strategies and objectives are as follows:

- Construct 50 3-4 bedroom units affordable for large family households.
- Construct 100 units of housing for the elderly.
- Increase the homeownership rate by providing first-time homebuyer programs and down-payment assistance programs. The objective is to convert 50 renters to homeowners.
- Provide homeowner housing rehabilitation assistance to fifty households.
- Provide homeownership counseling to 100 households.

Non-Housing Community Development The prioritized needs for non-housing community development includes: housing code enforcement in Low and Moderate Income (LMI) neighborhoods, drainage improvements and sidewalk construction in LMI neighborhoods, recreation improvements in LMI neighborhoods, public transportation that concentrates in LMI neighborhoods. Strategies and objectives are as follows:

- Provide concentrated code enforcement in LMI neighborhoods. Activity is projected on 100 houses.
- Construct drainage improvements at an estimated cost of \$400,000.
- Construct sidewalks in high-impact areas at an estimated cost of \$200,000.
- Provide recreation improvements in LMI parks and public facilities at an estimated cost of \$200,000.
- Facilitate the development of a public transportation system that will serve the LMI neighborhoods at an estimated cost of \$200,000. The system will be developed with transit funds from MPO.
- Develop plans to guide investment in housing, fair housing, and public infrastructure at an estimated cost of \$60,000.

Purpose

The Consolidated Plan (CP) is designed to be a collaborative process whereby the City of Cleveland establishes a unified vision for community development actions. The CP represents an opportunity to shape various housing and community development programs into effective, coordinated neighborhood and community development strategies. It translates into maximizing community impact with a fixed amount of dollars. The consolidated planning process creates the opportunity for meaningful citizen participation to take place in a comprehensive context, reducing duplication of effort at the local level.

The CP is a specific course of action for the revitalization of areas of the City of Cleveland that are in need. It integrates economic, physical, environmental, community and human development in a comprehensive and coordinated fashion so that families and communities can work together and thrive. The CP is a five year strategic plan. The CP sets the framework for all community development efforts made by the City of Cleveland in conjunction with the federal government, state of Tennessee, local non-profits, and citizens. Each year in the five year planning period, the City proposes and adopts an Action Plan. The action plan is a document that budgets all of available community development resources into specific projects and programs that will address needs identified in the CP.

The CP is the means to meet the Federal application requirements for the following programs administered by the U.S. Department of Housing and Urban Development (HUD):

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Shelter Grant (ESG)

The statutes for these formula grant programs set forth three basic goals against which the CP and the City of Cleveland's performance under the CP will be evaluated by HUD. These statutory goals are:

1. Decent Housing – which may include

- assisting homeless persons obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining affordable housing stock;
- increasing the availability of affordable permanent housing;
- increasing the supply of supportive housing
- providing affordable housing that is accessible to job opportunities.

2. A Suitable Living Environment – which may include

- improving the safety and livability of neighborhoods;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conservation of energy resources.

3. Expanded Economic Opportunities – which may include

- job creation and retention;
- establishment and expansion of small businesses;
- the provision of public services concerned with employment;
- availability of mortgage financing ;
- access to capital and credit for development activities that promote long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low income persons.

The CP covers the period from July 2004 through June 2009. Included in this document is the City of Cleveland's Action Plan for the fiscal year 2004-2005.

The Consolidated Planning Process

Lead Agency

The City of Cleveland's Planning and Inspections Department is the lead agency for the CDBG Program. Based upon the Department's overall mission which includes land use planning and regulation; transportation planning; building plan review, permits and inspections; code enforcement; and CDBG administration, it is anticipated that the Department's name will be changed to the Community Development Department.

Citizen Participation Plan

The City of Cleveland adopted a Citizen Participation Plan on March 8, 2004 at the regular meeting of the City Council. This Plan details the process by which interaction between the City and the public occurs regarding use of community development funds. The Plan defines the amendment process for the CP. The plan is attached as Exhibit A.

Plan Development Process

The process began on February 19, 2004 when staff was provided with a copy of a HUD letter stating that Cleveland was now a CDBG entitlement community. Staff attended a training session for new grantees at the HUD office in Knoxville on that same day and the training included development of the consolidated plan. Also on that same day, staff contacted consultant Randy Nelson to assist in the development of the consolidated plan. A citizen's participation plan was written by staff and advertised on March 7, 2004 for a public hearing on March 22, 2004 where the plan was adopted by City Council. An advertisement was placed on March 5, 2004 for a public hearing to be held on the Consolidated Plan on March 25, 2004. The above-described letter/Questionnaires were sent to service providers on March 11 and 12, 2004 and individual consultations were conducted with several service providers and organizations. The data from the consultations and the public hearings were analyzed along with data from the Census and other sources that pertain to each required component of the strategic plan and the consolidated action plan.

The collection and analysis of these data was performed by City staff in collaboration with Randy Nelson who prepared the Consolidated Plan document and tables. The draft Consolidated Plan was reviewed by staff during the first week of April 2004. The draft Consolidated Plan was made available in accordance with the Citizens Participation Plan with the 30-day public comment period to begin with the City Council's review of the Consolidated Plan at its April 12, 2004 meeting. Comments were received by staff and evaluated with the results reported to the City Manager and the Mayor and City Council. After consideration of comments at the end of the 30-day comment period, the finalized Consolidated Plan was prepared for transmission to HUD for the 45-day review period prior to the beginning of the program year on July 1, 2004.

Consultation/Coordination

The City of Cleveland has consulted with appropriate public and private agencies that provide assisted housing, health services, and social services including services to children, elderly persons, homeless persons, persons with disabilities (including persons with HIV/AIDS and their families). The City has also consulted with other categories of persons and among its own departments.

Consultation with public and private agencies has occurred through written correspondence, telephone conversations, and personal interviews. Agencies were sent a letter announcing the CDBG Consolidated Plan process, the March 25, 2004 public hearing, and the opportunity to meet one-on-one with City staff. The letter included a questionnaire designed to gather information about the services provided by the agency and opinions about community needs, especially the needs of very-low, low, and moderate-income persons. Twenty-six such letters were distributed on March 11 and 12, 2004. Assisted housing providers contacted included the Cleveland Housing Authority and Habitat for Humanity, as well as Ocoee Outreach and Christmas in April which provide limited home repairs. The River County Association of Realtors, Horizon Square Apartments (Section 8 assisted), and the operator of the weatherization assistance program were also contacted. Other agencies were contacted that provide temporary shelter or other housing assistance: Nancy's House and Chattanooga Cares (HIV/AIDS), the Reality House Halfway House (substance abuse recovery), Family Resource Center Family Violence Program (abused spouses and children), Bradley/Cleveland Developmental Services (mental health), and Bradley/Cleveland Community Services Agency-Cleveland Emergency Shelter (homeless). The Bradley/Cleveland Community Services Agency is the operator of the senior center and various programs for seniors including on-site feeding and home-delivered meals. Health-related consultations included the Bradley County Health Department and Hiwassee Mental Health. Operators of programs for children that were consulted included the Department of Children's Services, the Weed and Seed Program that operates the Blythe Avenue Safe Haven, and the City's community centers.

City staff is consulting internally on the operation of the CDBG program and how CDBG funds might be used to meet community needs. The City's Department of Planning and Inspections Department (anticipated to be re-named "Community Development Department") is administering the start-up and operation of the CDBG program. The City's Finance and Administration Department will be merging the new CDBG program with the City's budget and audit processes. The City Manager's staff has developed and is implementing the citizen's participation plan and process. The City's Public Works Department has been consulted to determine what high priority public facilities (drainage, sidewalks, etc.) needs have been already identified within the City's low- and moderate-income areas. Planning and Engineering staff have cooperated in the analysis and mapping of low- and moderate-income data. The Recreation Department has been consulted and is involved through the South Cleveland and Northeast Cleveland Community Centers. Police and Code Enforcement will be consulted and actively involved through their on-going participation in the Weed and Seed Program.

Other persons are being consulted through the public hearing process, through publicity and contacts about the CDBG program by the City, and through contacts concerning CDBG from service providers in the community. Contacts have been made by City staff with the media and with various organizations with substantial community contact including the NAACP, the Ministerial Association, the Unity Center, and the Bradley Initiative for Church and Community. The letter and questionnaire referred to above were specifically designed so that they could be answered from an individual as well as an agency perspective and it is anticipated that this information will circulate in the community, for example, the Weed and Seed citizens action committees will be discussing this material that asks about community needs. Citizens were given the opportunity to comment on community needs and the CDBG program before, during, and after the March 25, 2004 public hearing. Over 30 persons participated in the March 25, 2004 public hearing. At least one public hearing per year concerning the Consolidated Plan is anticipated as well as other ongoing opportunities as the understanding of community needs is more fully developed, such as through the analysis of impediments to fair housing and other planning activities.

Institutional Structure

Several public and private organizations are involved in the institutional structure that will carry out the Consolidated Plan. The City of Cleveland will be the CDBG grantee and will administer the program through its Planning and Inspections (Community Development) Department. This department will support the CDBG program through planning and administrative activities. The department intends to hire a Community Development Coordinator to carry out most of these program management tasks. It is expected that the Community Development Coordinator will be in place on or before the initial CDBG program year on July 1, 2004. The Coordinator will work closely with the City's Public Information Officer, or other staff assigned by the City Manager, to maintain communication with the public and the various public and private entities that will carry out the Consolidated Plan.

Many organizations are involved specifically in housing. The Cleveland Housing Authority manages all public housing units and the Section 8 rental assistance program. The City of Cleveland has cooperated with the Cleveland Housing Authority through the appointment of board members and the maintenance of streets that serve as driveway and parking areas for public housing. The Cherokee Douglas Economic Development Authority owns and manages low-income elderly apartments in Cleveland, and the City of Cleveland has cooperated with this agency through technical assistance for rezoning and subdivision of land for additional apartments. The Cleveland Bradley Housing Corporation, with administrative support of the Bradley/Cleveland Community Services Agency, provides assistance to first-time homebuyers with funding from the Tennessee Housing Development Agency (THDA) and HUD. Habitat for Humanity provides homeownership opportunities for low- and moderate-income persons by constructing new homes and sometimes through rehabilitation of existing homes. The City of

Cleveland has cooperated with Habitat for Humanity by providing lots for the construction of housing, technical assistance in subdivision planning, and technical assistance in grant applications. HOME funds administered by the Southeast Tennessee Development District (SETDD) provide some housing rehabilitation opportunities in Cleveland. The City of Cleveland has cooperated with SETDD in this effort by providing referrals to the program and through assistance on small-lot zoning issues for housing reconstruction. Limited home improvements are provided through the Weatherization Assistance Program administered by the Bradley/Cleveland Community Services Agency, and private programs such as Ocoee Outreach, Christmas in April, and other private faith-based efforts. The Weed and Seed program's Blythe Avenue facility is located in a former city school provided for this purpose and it houses various programs, including the BICC Credit Union that can provide affordable borrowing for home repairs and home purchases (the City provided \$5000 in seed money to the BICC Credit Union). Private entities involved in the provision of housing at all price levels include the River County Association of Realtors and the Ocoee Regional Builders Association; City staff coordinate through regular contact with individual realtors and builders and sometimes through meeting with these groups on specific issues.

Several organizations are involved in non-housing community development needs. The United Way of Bradley County maintains a directory of these agencies and their services, and supports many activities financially through contributions raised through payroll deductions at various local employers, including the City of Cleveland. The City of Cleveland and Bradley County provide recreational facilities and programs at various parks and community centers. Major private providers of recreational services include the YMCA, the Boys Club, and organizations such as Lee University, the Church of God International Headquarters (greenway site), First Baptist Church, Westwood Baptist Church, Broad Street United Methodist Church, Westmore Church of God, and others which allow some community access to their recreational facilities or which conduct recreational programs open to the community. Lee University requires student involvement in community services and this is accomplished in various structured ways such as a program for special needs children conducted by Cleveland City Schools using Lee University facilities.

The City of Cleveland, through its Public Works and Planning and Inspections Departments, provides design, construction, and maintenance of various public infrastructure including streets, sidewalks, and drainage structures, as well as code enforcement, lot clearance, and removal of debris. The Weed and Seed program was established by the Cleveland Police Department through a Department of Justice grant and it has provided a way for citizens to access various services such as child care, and dialogue about their needs through citizen action committees, etc. Health and social services are provided by various state agencies with local offices such as the Health Department, the Community Service Agency, Developmental Services, Family Services, etc. Organizations like BICC, the lead agency in a growing annual Festival of Cultures held downtown on city and county property, work to improve communication in the broader community.

Limited data is available at this time to assess the strengths and gaps in the service delivery system. The United Way has conducted a community needs assessment that can be evaluated for the purpose of the Consolidated Plan and supplemented with other information. The housing and community service agencies that were consulted in the consolidated plan development process were asked to provide opinions and data concerning unmet needs. These data and other supplemental information will provide a more coherent picture of community needs. Also, the state of public-private and interagency communication regarding community needs will have to be evaluated. The basic institutions needed to provide services seem to be in place and functioning but continuing dialog is needed with the public and between agencies, and about resource availability and critical needs. Some areas of need that have already been established for various low- and moderate-income areas are the needs for drainage, sidewalks, and recreation improvements that have been identified on the basis of citizen complaints and field observations; and citizen participation in the planning process; moreover, there is a backlog of these projects that have not been addressed due to a lack of funds.

The Consolidated Plan process requires specific comment on one particular aspect of institutional structure and that is the relationship between the City of Cleveland and the Cleveland Housing Authority. The City of Cleveland provides basic city services to public housing, and works in neighborhoods, including public housing developments, through programs such as Weed and Seed. The City is not involved in the operational decisions of the housing authority regarding hiring, contracting and procurement, and capital improvements. The City would be involved in decisions regarding the construction of additional public housing or the demolition or disposition of existing public housing if either of these were to take place.

**The City of
Cleveland
Strategic Plan**

2004-2009

City of Cleveland Strategic Plan.....2004-2009

The City of Cleveland is located in southeast Tennessee approximately 25 miles northeast of Chattanooga. The city has been experiencing growth as is evidenced by the fact that the federal government has recently given the city metro status. This status brings Federal funds into the community, and most relevant to this plan, CDBG dollars. The U.S. Census Bureau estimates that the state of Tennessee has increased in population by 2.7% since the 2000 census. This percentage applied to the City of Cleveland would give the city a current estimated population of 38,196. Table 1 gives a demographic profile of the community compared to the state of Tennessee. The profile indicates that the City is very similar to the average profile for the state of Tennessee.

Table 1 Demographic Profile, 2000, Cleveland, Tennessee

	<u>Cleveland</u>	<u>Tennessee</u>
Total Population	37,192	5,589,283
Percent < 5 years	6.5	6.6
Percent 5-17 years	15.4	18.0
Percent > 18 years	78.1	75.4
Percent > 62 years	13.9	12.4
Percent Minority	11.0	24.9
 Median Age (years)	 34.0	 35.9
 Average Household Size	 2.33	 2.48
Average Family Size	2.90	2.99
 Population > 25 years	 23,295	 3,744,928
% High School Graduate	76.0	75.9
% Bachelors Degree	22.3	19.6
 Disability Status (21-64 years) %	 20.0	 21.9
Median Household Income	30,098	36,360
Median Family Income	40,150	43,517
Per Capita Income	18,316	19,393
% Families below Poverty Level	11.3	10.3
Individuals below Poverty Level	16.1	3.5

Source: U.S. Census Bureau

Of note from this profile is: a) the significant higher percentage of elderly and persons over 18 years in the City of Cleveland than in the state, b) the lower percentage of school-age children, and c) the lower household income levels.

General Policies

Based on information acquired as a result of the CP planning process certain objectives have become clear. The following policies are offered as general guidelines to direct the specific strategies listed below. The major objectives are to insure maximum benefit for each single dollar of federal funds.

It shall be the policy of the City of Cleveland Community Development Department:

To concentrate CDBG and HOME assistance to the low and moderate income (LMI) census block groups within the city. Exceptions to this policy shall be for homeless and special needs housing and services.

To place a priority on competing projects that leverages other funds to the city.

To avoid duplication of support services from more than one agency for a given service.

The Homeless

Inventory of Homeless Service Providers

The homeless population in Cleveland is provided services and shelter by the following providers:

Emergency Shelter:

- Cleveland Emergency Shelter: 31 beds, 9 cribs
- Family Resource Agency: 12 people

Supportive Services

- United Way Service Agencies

Needs

The nature and extent of homelessness in Cleveland, Tennessee is difficult to measure and describe as it is anywhere else. Data specific to Cleveland are very limited. The Cleveland Emergency Shelter and the Family Violence Program have provided shelter to 600 persons and 148 persons, respectively during the most recent fiscal year. Not all people who are homeless or at risk of becoming homeless seek shelter through an organized program; some may live in over-crowded conditions with friends or relatives for a time and others may find shelter in building without adequate facilities, in cars, in campers, or in more makeshift shelters. Not all people who are homeless are homeless all of the time, so the total population of homeless in a given area at a given time can vary based upon the impacts of personal circumstances such as domestic violence and community circumstances such as the availability of jobs and affordable rental housing. Data cited by the Community Research Council, Inc. in a report for Hamilton County said that there were an estimated 10,000 homeless persons in Tennessee on any given day but this number could be found in Memphis alone at some times. Based upon this 10,000 statewide daily average, if the homeless were distributed proportionally with population throughout Tennessee on any given day, there would be about 65 homeless persons in Cleveland on an average day. Table 1A shows housing and supportive service needs for the homeless in Cleveland.

The National Coalition for Homeless estimates that the national homeless population ranges between 6.3% and 10.0% of persons in poverty nationwide, and they believe that the larger figure is more representative of the nation; these figures would reflect the total number of persons who would be homeless or at least at risk of being homeless throughout the year. If homelessness is moderated in Cleveland by relatively favorable employment, housing affordability conditions, and relatively smaller community size and trade/service area within the region, then a range of 4.0% to 6.0% of the poverty

population could more accurately reflect homeless conditions in Cleveland. This would mean that there are about 250 people experiencing homelessness in Cleveland during the year, and about 380 people who are either homeless or at risk of being homeless.

Information on the composition of the local homeless population is likewise scarce. National data on the composition of the homeless population may fairly well reflect the characteristics of Cleveland's homeless. The National Coalition for the Homeless (NCH Fact Sheet #3 "Who is Homeless?") discussed studies that showed that children comprised from about 30% to 40% of the homeless population, adults age 31 to 50 comprised about 50% of the homeless population, and that adults age 55 to 60 comprised from less than 5% to nearly 20% of the homeless population. The NCH reported that about 40% of the homeless were families, and families, single women with children, and children more heavily represented in the rural homeless population. The data reported by the NCH showed that single men comprised about 40% of the urban homeless while about 14% were single women. The data reported by NCH showed that the homeless were about 50% African-American, 35% Caucasian, 12% Hispanic, 2% Native American, and 1% Asian; and they noted that ethnic makeup varies by area and that the rural homeless were more likely to be white. Data reported by NCH indicate that half of all homeless women and children are fleeing domestic violence. The NCH report indicates that about 40% of homeless men are veterans as compared to about 10% of the general homeless population. The NCH report indicated that about 22% of homeless suffer from severe and persistent mental illness, but about three-fourths of this population would not require institutionalization if appropriate supportive housing were available. The NCH report supports an addiction disorder estimate among homeless adults of 34%.

Table 1A summarizes the homeless needs in Cleveland. Based upon the rural character of much of unincorporated Bradley County and the relatively large size of the white, non-Hispanic population in Cleveland and its environs, it is likely that the homeless population is predominantly white and that about half of the homeless are families and children, with the other half being single adults. Among the homeless in homeless families, it is assumed that three-fourths are women and children. Among the single-adult homeless, it is assumed that three-fourths are male. A relatively higher percentage (greater than 12%) of Hispanic persons of all races may be found among Cleveland's homeless since there is some indication that some members of this growing population group are marginally housed. It is likely that nearly all of the homeless in Cleveland are low-income and very-low-income. Otherwise, the data in the NCH report probably fairly reflect the Cleveland homeless population.

A limited number of facilities are available to house persons who are homeless in Cleveland. The primary facility is the Cleveland Emergency Shelter on Wildwood Avenue. This facility is operated by Bradley/Cleveland Community Services and it provides emergency shelter to homeless adults and families. The Cleveland Emergency Shelter has beds for 31 adults and 9 infant cribs. The Family Violence Program operates Harbor Safe House for women and children who are victims of domestic violence. Harbor Safe House has a 12 person capacity and it served 83 women and 65 children from June 2002 to July 2003. Bradley/Cleveland Developmental Services houses 103

mentally ill and mentally disabled persons in group homes and assisted living facilities, including two ten-person group homes for mentally ill adults and two six-person facilities for children---these facilities serve people who could become homeless. Nancy's House and Chattanooga Cares serve people with HIV/AIDS and their families, including housing assistance for 8-10 persons who could otherwise be homeless. Reality House provides transitional housing for recovering substance abusers and it has space for 10 persons. The United Way of Bradley County, Bradley/Cleveland Community Services, and some churches provide emergency temporary rent assistance that prevents homelessness in some cases. The Cleveland Housing Authority's public housing program serves primarily very-low-income persons and families who are otherwise at risk of being homeless.

Homeless needs determination involved consideration of the estimated homeless and potentially homeless populations described above together with the input of service providers and others during the consultation and public hearing process. The needs of the homeless and those threatened with homelessness in the various categories described above were determined mostly by the extent of the available facilities in comparison to the estimated needs. This is basically a comparison of shelter capacity with the estimated number of persons needing shelter. To the extent that there is a deficit of unmet requests for shelter in comparison to the estimated number of persons actually in need, it can be surmised that these persons are meeting shelter needs through some other means that may leave them marginally housed and in danger of becoming homeless. Past experience in code enforcement has indicated that people sometimes live in campers outside of lawful campgrounds with no utility connections or unlawful utility connections; that people sometimes live in vacant substandard buildings without owner permission; that people sometimes live in substandard apartments that were unlawfully built within other structures; and that people sometimes live in very overcrowded conditions and perhaps without the landlord's knowledge or permission. Multiple generations of long time residents and substantial extended family tend to be found among Cleveland residents so it is likely that temporary living with relatives may be providing shelter to significant numbers of potentially homeless persons.

Priority Homeless Needs The needs of each category of homeless or potentially homeless persons described above played a role in determining priority homeless needs. The extent of unmet requests for service was considered in each category so that the relative demand for shelter could be understood. Next, issues affecting vulnerability of the various categories of homeless or potentially homeless populations were evaluated. Circumstances affecting vulnerability might include the involvement of children, domestic violence, mental illness, etc. Vulnerability considers the likelihood of recovery without intervention and the potential for harm. The basis for assigning a priority to a given category of homeless persons was a balanced comparison of unmet demand and vulnerability. High unmet demand and high vulnerability would indicate a relatively high priority. Obstacles to meeting the underserved needs of the homeless and potentially homeless include insufficient data, limited resources for shelter and other homeless needs, and isolation of some affected populations from potential sources of assistance.

Obstacles

One obstacle to an effective homeless strategy is the lack of current reliable data on the homeless. With what we have been able to estimate however, the largest obstacles are attaining the funding to put in place missing pieces of the continuum of care; namely, transitional and permanent housing. Another obstacle is finding an acceptable site for housing for the homeless that will overcome a NIMBY reaction from the neighborhood.

Strategies

The homeless strategy can best be described as one of prevention and remediation. Prevention is of primary importance for a number of reasons. Prevention targets the potentially homeless, who are likely to be more numerous than the actual homeless at any given time, so prevention strategies can potentially protect a greater number of persons from the impacts of homelessness. Prevention is important because the transition of the potentially homeless into actual homelessness would overwhelm existing resources to an even greater extent. Prevention is potentially easier and more cost effective than addressing homelessness once it has occurred. But remediation is important to relieve suffering and to discourage the development of a permanent underclass who suffers a variety of ills stemming from an unfulfilled basic human need for shelter.

Prevention involves addressing identified causes of homelessness. Economic prevention strategies include support of education and employment opportunities. Structural prevention strategies would include support for the construction and maintenance of affordable rental and owner housing, as well as special needs housing. Organic prevention strategies would be support for the management and residential treatment of mental illness and substance abuse.

Remediation strategies include securing additional resources and better managing resources to supply the needs of the homeless and potentially homeless. In addition to considering the extent of unmet need and vulnerability, the potential for a remediation effort to be successful and to be successful in a timely and cost effective manner would need to be considered. Remediation might include such things expanding shelter space, providing motel vouchers in peak periods, providing health and counseling services on the shelter site, assisting homeless veterans to access the benefits network, etc.

Specific strategies that the city will seek to implement are the following:

A.1. The City will partner with a non-profit organization to establish a transitional housing facility and program for the city of Cleveland. The housing will provide a stable environment for homeless individuals and families, while support services are provided. The housing is provided for up to three years.

A.2. The City will partner with a non-profit organization to establish a supply of affordable permanent housing available for the clients that complete a period of time in the transitional housing.

Objectives

Ten units each of transitional and permanent housing will be constructed over the five year planning period. These units will be owned and operated by a non-profit agency and will provide the missing link in the continuum of care from homelessness to stability. Table 1C summarizes homeless and special needs objectives.

Special Needs Population

Inventory

The major agencies that provide housing and supportive services to the non-homeless population that have special needs are the following:

- Southeast Tennessee Human Resource Agency: elderly services, Childcare and transportation
- Bradley/Cleveland Developmental Services, Inc.: housing and service for mentally ill
- Bradley/Cleveland Community Services Agency: elderly services, comprehensive social services
- Hiwassee Mental Health Center: comprehensive mental health center, mentally ill housing, a/d counseling and Reality House (an A/D housing facility)
- Southeast Tennessee Development District: elderly services job training
- Douglas Cherokee Economic Authority: elderly housing
- Unity Center: services to families with school age children. Services include after-school tutoring and enrichment activities.

Needs

The 2000 Census reports that there are 4,220 persons from the ages of 21 to 64 years that are disabled in the City of Cleveland. Table 1 indicates that this proportion is similar to the states. Therefore, the proportion of disabled to the total population is to be considered average. Discussions were held with social service providers that offer services within the City of Cleveland. The priority needs that come to surface in the special needs population are housing and support services for the elderly and physically disabled, and treatment and housing for substance abuse.

Table 1B demonstrates a summary of the housing and service needs for the special needs population.

According to the Cleveland Police Department, Bradley County and the City of Cleveland have one of the highest production and usage rates of methamphetamine. In 2003 a total of 45 methamphetamine labs were seized in Bradley County, and 16 have been seized in 2004 to date. In an 18 month period in 2002 and 2003, 697 Children in Tennessee were removed from their homes for their protection because of methamphetamine production. This deadly drug will take its toll on the low income population of Cleveland.

Obstacles

Obstacles to providing the necessary services to the special needs population start with funding. Another obstacle is the lack of a comprehensive referral base. Services are provided by an assembly of non-profit organizations, each maintaining their own client base. There is no central clearinghouse to track services on a particular household.

Strategies

Strategies for the special needs population include the following:

B.1. Increasing the supply of supportive services for the elderly.

The city will support applications for funding for elderly support services and will consider providing leverage funds for projects through the CDBG program.

B.2. Increase the availability of support services for the frail elderly.

The city will support applications for programs providing services for this population.

B.3. Increasing the supply of affordable and accessible housing and supportive services for the physically handicapped.

The city will support applications for subsidized housing for this population, and will provide leverage for projects. The city will consider a bonus program for private developments for developers to build handicapped units above what the codes require.

B.4. Increase the supply of housing and treatment for victims of substance abuse.

Recognizing the increasing use and problems created by this drug, the city will support non-profits to creatively combat the proliferation of its use and provide housing during treatment.

Objectives

An increase in the level of service for the elderly and frail elderly will increase by 100 persons each.

An increase of 50 units will be achieved of handicapped accessible housing.

An increase in prevention and treatment capacity of substance abuse agencies will be achieved by 10 units over the five year planning period.

Table 1C summarizes the special needs and homeless objectives.

Affordable Housing

Inventory of Available Programs

- Ocoee Outreach; home repair for approximately 25 houses/year
- Cleveland Housing Authority; 674 units of public housing, 204 Section 8 vouchers
- Habitat for Humanity; builds homes for first –time homebuyers
- Cleveland Housing Corporation, a subsidiary of Bradley/Cleveland Community Services Agency, an active Community Housing Development Organization providing HOME rental housing (22 units in The City of Cleveland) and first-time homebuyer assistance
- Southeast Tennessee Development District; owner-occupied housing rehabilitation and administers HOME funds for the City

Needs/Market Analysis

Affordable housing, as used in this document, is defined as housing that is affordable to low and moderate income households. Low and moderate income are those households earning less than 80% of the median income adjusted for household size. Affordability is defined as a monthly housing payment (lease or mortgage) that is less than 30% of gross income. Table 2 is a profile of the Cleveland housing market compared to the state of Tennessee.

Table 2 Housing Profile, 2000, Cleveland Tennessee

	Cleveland	Tennessee
Total Housing Units	16,452	2,439,443
% 1-unit detached	57.9	67.3
% 1-unit attached	1.7	2.8
% 2- unit (duplex)	10.3	3.4
% 3-9 units	19.5	7.8
% > 9 units	8.4	7.5
Tenure		
Total Occupied Units		
% Owner-Occupied	51.8	69.9
% Renter-Occupied	48.2	30.1
Percent Vacant Units	8.5	8.5
Year Structure Built		
1990 to March 2000	19.8%	23.3%
1940-1989	73.4%	68.8%
1939 or earlier	6.8%	7.9%
Median Number of Rooms	5.0	5.4
Year Householder Moved Into Unit		
1999 to March 2000	28.4%	20.7%
1970-1995	63.3%	69.5%
1969 or earlier	8.3%	9.8%
Occupants per Room		
Percent 1.0 or less	97.9	97.3
Percent > 1.0	2.1	2.7
Median Value	\$ 98,000	\$93,000
Median Mortgage	\$ 882	\$882
Monthly Owner Costs As A Percentage of Income		
> 30 %	20.0%	19.7%
Median Gross Rent	\$457	\$505

Monthly Gross Rent As A Percentage of Income > 30 %	36.9%	34.1%
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Source: U.S. Census Bureau

The City of Cleveland’s housing is very similar to the state average. Notable differences, which indicate needs, are the following:

- The percent of housing that is multi-family is higher than the state of Tennessee’s. This is indicative of a metro area in a rural state, however.
- The percent of units that are occupied by renters is comparatively high. Conversely, the percent of homeownership is low. The proportion of owner and renter occupied units in the city of Cleveland is approximately equal at 50% each. The state’s homeownership rate is 70 % and the national average is 66%. The City of Chattanooga’s is 55%.
- The city’s vacancy rate is equal to the state, indicating that supply and demand are in balance. 8.5 percent is considered a healthy vacancy rate.
- The number of units built since 1999 is considerably lower than the state’s. This means less growth but also less replacement and therefore an older housing stock suggesting the need for housing rehabilitation programs for LMI households.
- The recent mobility of the population of Cleveland is higher than the state’s.
- The gross rent for Cleveland is considerably less than the states and the City of Chattanooga’s. Chattanooga’s median gross rent is \$495 compared to Tennessee’s \$505 and the City of Cleveland’s \$457. It would appear from supply and demand theories that the supply of rental housing is more than adequate.
- The median value of a home is 5.4% higher than in the state.
- Thirty seven percent of renters and twenty percent of owners are living in housing that is not considered affordable. The numbers are high, but appear to be in consistent with the state averages.

A survey was taken of Apartment Complexes within the city to determine the number of privately-owned subsidized rental units available to low and moderate income households, including the elderly. It is determined that there are approximately 955 units. These units are Low Income Housing Tax Credit properties and properties that receive other Federal subsidies through USDA Rural Development and HUD.

Priority Needs. Table 2A shows relative housing needs for Cleveland. Based on the above information, the priority affordable housing needs for the City of Cleveland appear to be the following:

1. Home buyer assistance programs

The most notable housing statistic is the low homeownership rate in the City of Cleveland. The value of homeownership in a community cannot be underestimated. Homeownership improves communities.

2. Housing rehabilitation

The comparatively older housing stock and general visual assessment of low income neighborhoods indicate the need for housing rehabilitation programs.

3. The need for additional housing for the elderly.

Social service providers stress this need.

4. The need for rental housing for large families.

Statistics show overcrowdedness a problem for these households, particularly those under 30% of median income.

Public Housing

The Cleveland Housing Authority has 674 units of public housing on 14 sites. There is no huge out-of-proportion sites. The largest is Northeast Apartments with approximately 60 units. The Authority has 208 Section 8 vouchers. Approximately 35% of the units are occupied by elderly households. The waiting list for Section 8 vouchers has over 200 names and it is closed. The Authority has no self-sufficiency program, but is planning a potential homeownership program.

Discussions with the Housing Authority have indicated that the agency has adequate funds from HUD to maintain its properties. The need, however, for sidewalk improvements adjacent to several of its developments has been expressed.

Lead Based Paint Hazards

City staff consulted with Rhonda Payne, Health Educator and Pinky Noble-Britton, RN of the Tennessee Department of Health regarding lead-based paint. No address-specific data is available on lead poisonings for Tennessee. They provided an October 2002 article from *Tennessee Medicine* entitled “Pre-1950s Housing in Tennessee Counties Puts Children at Risk for Lead Poisoning” by Stultz, Weatherby, et al. The article notes that lead was one of the main ingredients in oil-based paint manufactured before 1950, over 50% by dry weight, and that manufacturers began replacing lead with other ingredients in the 1950s. Regulations reduced lead to 0.6% by weight in 1972 and banned lead in house paint by 1978. Where older homes have deteriorated, paint chips and dust present lead hazards for children age 6 and under who may ingest or inhale the lead damaging their brains and internal organs. Data from the 2000 Census showed that the City of Cleveland contained 2380 housing units built prior to 1950 and that 2171 of these units were

occupied. Data from the 2000 Census show that 2167 of 9766, or 22.2%, of family households in Cleveland had children under 6 years old; so it may be reasonable to assume that 22.2%, or approximately 482, of the 2171 pre-1950 occupied housing units are inhabited by children under 6 years old.

Barriers to Affordable Housing

The city planning staff conducted a study of the land use control policies and regulations that are in effect for the City of Cleveland. No unreasonable permits, ordinances, policies or practices could be detected that would unnecessarily drive up the cost of housing. The city has no impact fees for development. The zoning ordinance allows a minimum of 7,500 square foot lots in most zoning districts. The R-2 district which covers much of Cleveland allows single-family homes to be built on 5,000 square foot lots. This is relatively small for single family zones in Tennessee.

Fair Housing

The City of Cleveland will be conducting an Analysis of Impediments to Fair Housing over the five year planning period. This study is a comprehensive review of housing market and mortgage lending data to determine any existing impediments to fair housing in the housing market and corrective actions to be taken to correct them. Strategies will be developed as a result of this study, and funds distributed accordingly in the annual Action Plans.

Obstacles

The major obstacle to providing the affordable housing needed in this strategic plan is funding. Data is readily available. The city has the capacity to provide the housing and services through various non-profit providers. Another obstacle to providing affordable housing is the lack of a strategic plan. There is no current coordination among the various providers. Each does their own thing. Hopefully, the CP will provide a framework for effective coordination of resources.

Strategies

Strategies to be undertaken to improve affordable housing opportunities in the City of Cleveland include the following:

C.1. Increase the supply of rental housing for large families.

C.2. Increase the supply of rental housing for the elderly.

C.3. Increase homeownership opportunities by promoting first-time homebuyer programs within the City, including down payment assistance programs, lot clearance and donation programs, and leveraging other funds.

C.4. Provide housing rehabilitation assistance to very low income households within the low moderate income target area. Housing rehabilitation will revolve around the availability of HOME funds from THDA. The availability of those funds will be at a maximum in year 2007. CDBG funds into housing rehabilitation should be planned to be maximum in that year to leverage the HOME grant and provide sufficient funds for a housing rehabilitation program.

C.5. Provide homeownership counseling to include basic life-skills and credit counseling.

Objectives

The objectives for affordable housing strategies are summarized on Table 2C, and as follows:

It is proposed that 50 units of rental housing for large families will be constructed over the planning period.

A total of 100 units of housing for the elderly will be constructed.

Fifty existing renters will become homeowners due to homebuyer programs, and a total of 100 households will receive homeownership counseling.

Fifty houses will be rehabilitated with assistance from CDBG and HOME funds.

Non-Housing Community Development

Inventory

This list is an inventory of organizations that provide area -based neighborhood community development activities:

- Blythe Avenue Neighborhood Weed and Seed Program
- Neighborhood Citizens Action Group. South Cleveland

Needs

Needs in non-housing community development issues were derived from the appropriate active providers of services and from the City of Cleveland Public Works and Recreation Departments. The City has a Capital Improvements Needs Inventory (CINI) for fiscal years 2005 through 2010. This planning document is based upon departmental evaluations of facilities and equipment and upon the demand for services. The CINI is a primary source of information in the capital budgeting process.

Many social service providers expressed the need in consultations for housing code enforcement, particularly in the LMI neighborhoods. Also, public transportation was an issue that repeatedly came to the surface.

Public service needs are basically addressed in the special needs populations. The City of Cleveland does not consider any public service needs that are not addressed by the special needs category to be of a high or even a medium priority.

Needs are summarized on Table 2B.

Obstacles

Adequate funding is the major obstacle to addressing non-housing community development needs. Another obstacle is the lack of neighborhood –based organizations that will promote community development activities within their neighborhoods.

Strategies

D.1. Concentrate housing code enforcement in the LMI target area.

D.2. Make sidewalk improvements in the LMI neighborhoods to improve safety and livability.

D.3. Improve drainage in critical areas within the LMI neighborhoods.

D.4. Expand recreational opportunities in LMI neighborhoods to improve the quality of life.

D.5. Assist in the establishment of a coordinated public transportation system that will serve the LMI target area.

Objectives

Objectives are summarized on Table 2C and as follows:

Housing code enforcement will result in actions taken on 100 additional houses in the LMI target area.

A total of \$200,000 will be budgeted for sidewalk improvements in the LMI target area. The improvements will be concentrated in areas with high pedestrian use and other areas of public safety concern.

A total of \$400,000 will be budgeted for drainage improvements in the LMI target area.

A total of \$200,000 will be budgeted for recreational improvements in the LMI target area. These improvements will take place according to the Capital Needs Inventory.

A public transportation system will be established and operated by a non-profit agency. The system will provide transportation in the LMI target area.

City of Cleveland Strategic Plan.....2004-2009

Anti-Poverty Strategy

The percent of families and individuals in the City of Cleveland that are in poverty are 11.3% and 16.1% respectively. The proportion of each is higher than the state of Tennessee's average.

Strategies in the CP that will result in reducing the poverty levels are the following:

- Targeting CDBG funds to the LMI neighborhoods. This results in a collective increase in property values and an improvement in net worth. The LMI neighborhoods are demonstrated on a map in Exhibit D.
- Increasing the supply of affordable housing for the elderly, physically handicapped, and large family households. These households are cost burdened and the result will be an increase in income to be used for personal needs.
- Providing housing rehabilitation assistance to poverty level households. This will result in less maintenance costs.
- Implementing homebuyer assistance programs. Converting renters into homeowners allows them to build equity in their homes.
- Increasing housing and treatment for substance abuse households will reduce the poverty rate by affecting the purchase of these substances and allowing the people to have more funds for living expenses.
- Providing transitional and permanent housing for the homeless reduces poverty by stabilizing these households.

The housing programs implemented by the City will be coordinated with existing social service agencies at the local and state level to insure a comprehensive assessment of an affected household's situation. The agencies will respond according to their capabilities and policies.

In summary, it is anticipated that this Strategic Plan will result in the reduction of persons and families in poverty an estimated 3-5%.

City of Cleveland 2004-2005

Action Plan

City of Cleveland 2004-2005 Action Plan

This plan describes the actions, projects, and programs that the City of Cleveland will implement to address priority needs and strategies identified by the Strategic Plan. Table 3 presents in a summary format the HUD required information on each project.

Sources of Funds

The funds that will be available for the program year 2004-2005 are CDBG funds in the amount of \$405,000.

Statement of Specific Annual Objectives

The strategies that are addressed in the Action Plan are identified by code in the appropriate Table 3 and include the following:

1. Drainage improvements to increase the safety of neighborhoods.
2. Sidewalk improvements to provide safe pedestrian transportation within neighborhoods.
3. Recreational public facility improvements to improve the quality of life in neighborhoods.
4. Homebuyer assistance to increase the homeownership rate in the City of Cleveland.
5. Code enforcement to improve the appearance of neighborhoods and provide economic stability.
6. Planning to provide improved coordination of resources and maximize efficiency.

Description of Projects

The description of projects can be seen on Table 3. There is a separate Table 3 for each project.

Geographic Distribution

All activities will take place in the LMI neighborhoods identified in Exhibit D.

Homeless and Other Special Population

The needs of the Homeless and other special populations will not be addressed in this action plan. More planning is required before the city is able to invest in a particular program.

Needs of Public Housing

The Cleveland Housing Authority expressed a need for sidewalk improvements adjacent to some of their developments. These requests will be considered when prioritizing locations of sidewalks that are to be constructed in the target area.

No other public housing needs were identified in the Strategic Plan.

Anti-Poverty Strategy

No reduction in the number of households at poverty level is anticipated in this Action Plan.

Lead-Based Paint Hazards

No actions will be taken this year that will reduce the number of dwelling units that contain lead-based paint. However, it is very likely that by participating in first-time homebuyer programs by donating building lots, renters will be moving out of units that contain lead-based paint.

Other Actions

It is expected as a result of the City becoming an entitlement and the community going through the Consolidated Planning Process the following will occur:

- The institutional structure by which housing and social service activities are provided will be enhanced.
- Better coordination between the City and various nonprofit providers will be achieved. The foundation of a permanent partnership between the city and nonprofit housing and social service providers has been created.

Monitoring

The City will have a minimal number of subrecipients as a result of this Action Plan. The City will hire a Community Development Coordinator to administer the CDBG program. The coordinator will be responsible for all monitoring action required by HUD.

Table 3
Consolidated Plan Listing of Projects

Applicant's Name City of Cleveland

Priority Need
General Administration

Project Title
Administration

Project Description

The project includes the general administration required for the implementation of this action plan. An Analysis of Impediments to Fair Housing will be conducted utilizing these funds.

Location
LMI target area

Objective Number NA	Project ID 07
HUD Matrix Code	CDBG Citation 570.206 (a) (c)
Type of Recipient City	CDBG National Objective
Start Date (mm/dd/yyyy) 7-1-04	Completion Date (mm/dd/yyyy) 6-30-05
Performance Indicator	Annual Units
Local ID	Units Upon Completion

Funding Sources:

CDBG	60,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	60,000

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name City of Cleveland

Priority Need
Lot Clearance

Project Title
Lot Clearance

Project Description

The project includes the clearance of real property within the LMI target area as a means to approve the appearance of these areas.

Location
LMI target area

Objective Number D.1.	Project ID 05
HUD Matrix Code	CDBG Citation 570.201 (d)
Type of Recipient City	CDBG National Objective Elimination of Slums/Blight
Start Date (mm/dd/yyyy) 7-1-04	Completion Date (mm/dd/yyyy) 6-30-05
Performance Indicator 10 lots	Annual Units 10 lots
Local ID	Units Upon Completion 10 lots

Funding Sources:

CDBG	5,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	5,000

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name City of Cleveland

Priority Need
Planning

Project Title
Planning

Project Description

The project includes planning required for the implementation of this action plan.

Location

LMI target area

Objective Number D.6.	Project ID 06
HUD Matrix Code	CDBG Citation 570.205 (a)
Type of Recipient City	CDBG National Objective LMI Benefit
Start Date (mm/dd/yyyy) 7-1-04	Completion Date (mm/dd/yyyy) 6-30-05
Performance Indicator	Annual Units
Local ID	Units Upon Completion

Funding Sources:

CDBG	20,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	20,000

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name City of Cleveland

Priority Need

Owner-Occupied Housing

Project Title

Property Acquisition for Affordable Housing

Project Description

The project includes the acquisition of real property within the LMI target area for use by various non-profit agencies to construct housing for purchase by LMI households.

Location

LMI target area

Objective Number C.3.	Project ID 04
HUD Matrix Code	CDBG Citation 570.201 (a)
Type of Recipient City	CDBG National Objective LMI benefit
Start Date (mm/dd/yyyy) 10-1-04	Completion Date (mm/dd/yyyy) 12-31-05
Performance Indicator 10 lots	Annual Units 10 lots
Local ID	Units Upon Completion 10 houses

Funding Sources:

CDBG	30,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	30,000

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Applicant's Name City of Cleveland

Priority Need

Public Facilities

Project Title

Recreation Improvements

Project Description

This project includes improvements to the public parks, recreation centers, and community centers in the LMI target area. Priorities would include playground and picnic area improvements at Mosby Park, Blythe Avenue Safe Haven, South Cleveland Community Center, and Blythe Bower Park. These improvements include various infrastructure and other improvements, including picnic tables, grills, trash receptacles, water fountains, playground equipment, fencing, sidewalks, etc. It is anticipated that efforts to enhance services at these facilities will continue to be enhanced through the Weed and Seed program to be expanded to include the Northeast Recreation Center and Mosby Park area.

Location: LMI Target Area

Objective Number D.4	Project ID 02
HUD Matrix Code	CDBG Citation 570.201 (c)
Type of Recipient City	CDBG National Objective LMI benefit
Start Date (mm/dd/yyyy) 7-1-04	Completion Date (mm/dd/yyyy) 12-31-05
Performance Indicator \$90,000	Annual Units \$90,000
Local ID	Units Upon Completion

Funding Sources:

CDBG	90,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	90,000

**Table 3
Consolidated Plan Listing of Projects**

Applicant's Name City of Cleveland

Priority Need
Infrastructure

Project Title
Sidewalk Improvements

Project Description

The project includes the construction of sidewalks and associated improvements (driveways, drainage, utility modifications, etc.). The emphasis is anticipated to be on Inman Street eastward to the city limits, and around public facilities (for example, Blythe Bower School and various parks). The exact location will be determined by the evidence of need and cost-benefit analysis.

Location: LMI Target Area

Objective Number D.2	Project ID 01
HUD Matrix Code	CDBG Citation 570.201 (c)
Type of Recipient City	CDBG National Objective LMI benefit
Start Date (mm/dd/yyyy) 7-1-04	Completion Date (mm/dd/yyyy) 12-31-05
Performance Indicator \$180,000	Annual Units \$180,000
Local ID	Units Upon Completion \$180,000

Funding Sources:

CDBG	180,000
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	
Total	180,000

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Exhibit A. Citizen Participation Plan

EXHIBIT A
COMMUNITY DEVELOPMENT BLOCK GRANT
CITIZEN PARTICIPATION PLAN
March 17, 2004

1.0 PURPOSE

The City of Cleveland Community Development Citizen Participation Plan represents a document and program designed to actively seek the advice and counsel of the citizens of Cleveland in the preparation, administration and implementation of the Community Development Program. It is the express purpose of this plan to develop mechanisms that will ensure that the citizens of the City of Cleveland have the opportunity for ongoing participation. It is also intended to establish procedures through which the City of Cleveland staff and officials may solicit and receive input from citizens, non-profit organizations, and other interested parties. The intent of the plan is to provide an adequate opportunity to review and comment on the Community Development program, goals, priorities and projects.

The City of Cleveland Public Information Officer will be responsible for the implementation and coordination of citizen participation activities, responses and comments.

2.0 METHOD OF APPROACH

Several approaches or techniques will be utilized to implement this plan. All retain the primary purpose of soliciting and receiving citizen input on the Community Development program, goals, priorities and projects.

3.0 PUBLIC HEARINGS

The City of Cleveland Public Information Officer will be responsible for conducting two public hearings each fiscal year. At each public hearing the citizens of Cleveland will be invited to participate for the purpose of obtaining their views as well as those of public agencies, and other interested parties. The public hearings will identify housing and Community Development needs of the community, review proposed uses of funds, and review program performance.

- One public hearing shall be conducted by the City of Cleveland Public Information Officer and City of Cleveland Community Development staff at 4:00 p.m. in the Council meeting room on the second floor of the City Municipal Building (City Hall) during the fourth quarter of each program year cycle (April, May or June). During the “start up” year a public hearing will be held during the month of March 2004.

- A second public hearing shall be conducted by the City of Cleveland Public Information Officer and Community Development staff during the second quarter of the regular program year cycle (October, November, or December) at a location in a neighborhood of a Community Development activity.

The citizens of Cleveland, public agencies, and other interested parties are invited to comment on the Community Development program, goals, priorities, and projects at the public hearings or within 30 days after the public hearings.

The Community Development staff will ensure that special procedures will be used to assist low- and moderate-income persons, elderly, persons with disabilities, and non-English speaking persons attending meetings have access to information and material.

The City of Cleveland encourages citizen participation in the Community Development program, emphasizing the involvement of low, very low, and poverty income residents where housing and Community Development funds may be spent. The City of Cleveland shall afford the citizens adequate and timely notification of all local meetings, public forums, and public hearings.

- Notice shall be placed in the local newspaper of general circulation no less than 15 days before the meeting, forum, and hearings.
- Notice will be provided to local agencies that provide services to low, very low and poverty income residents of Cleveland.

The Citizen Participation Plan guarantees the access of information for the citizens, public agencies, and other interested parties including those most affected to have the opportunity to review information, review and submit comments on any proposed submission concerning the amount of funds available, including the estimated amount proposed to benefit low, very low, and poverty income residents. Community Development information can be accessed at the Community Development office at 185 Second Street NE, Cleveland, Tennessee 37311 (Old Central Service Building) or at the Public Information Officer's Office at 160 Second Street NE (Old City Hall Building), Cleveland, Tennessee 37311, in the Planning Department or on the City of Cleveland Web site, <http://www.cityofclevelandtn.com>.

Plans to minimize displacement and assist those displaced as a result of these activities shall be made available to all citizens, public agencies, and other interested parties.

The Community Development staff shall provide technical assistance to low, very low, and poverty income groups that request assistance concerning the Community Development program, goals, priorities, and projects.

4.0 COMMUNITY-WIDE AND PROJECT AREA ACTIVITIES

To broaden public participation in the Consolidated Planning process, the City Public Information Officer and Community Development staff will make presentations within the community to explain the Community Development program and to solicit comments. Presentations will be made during the months of March and April 2004 to introduce the program to the community at-large, CDBG eligible neighborhoods, and agencies that provide services to low and moderate-income residents of Cleveland. Surveys will be distributed to those in attendance to solicit input and for distribution within the organizations. The Weed and Seed Steering Committee will be a target organization for participation since this group serves a low income target area of the community. In addition to the presentations made to interested groups and organizations, media coverage will be promoted and coordinated by the City Public Information Officer (PIO). A record will be kept of each presentation, media coverage and a final report will be prepared by the PIO on the level of participation, media coverage and comments received in this phase of the Citizen Participation Process

The City of Cleveland Planning Commission will comment on the Community Development program, goals, priorities, and projects in keeping with the scope of the Community Development Block Grant Program prior to the public hearings. The Planning Commission will be requested to identify housing and Community Development needs, review proposed use of funds, and review program performance. Planning Commission meetings are open to the public and conducted on a regular basis. The Community Development staff will ensure that special procedures will be used to assist low and moderate income persons, elderly, handicapped, and non-English speaking persons serving on or attending meetings have access to information and material.

5.0 PROGRAM CHANGES

Prior to the submission of any substantial change in the proposed use of Community Development funds, citizens shall have notice of, and an opportunity to comment on, the proposed amendment.

The Community Development staff shall contact other City departments, local agencies, and organizations to assist in the identification of housing and Community Development needs, review proposed use of funds, and review program performance. Public agencies and other interested parties shall include, but not be limited to: Cleveland Housing Authority for public housing residents,

Mainstreet Cleveland, Weed and Seed Steering Committee, and the Cleveland Municipal Planning Commission.

6.0 PLAN AMENDMENT

This plan may be amended from time to time in order to strengthen the process for encouraging constructive citizen participation in the Community Development program, goals, priorities, and projects. Prior to plan amendment the citizens of Cleveland, non-profit organizations, public agencies, and other interested parties shall be invited to comment on plan amendments by notification in the *Cleveland Daily Banner*, a newspaper of general circulation.

Exhibit B. List of Agencies

EXHIBIT B LIST OF AGENCIES

In accordance with HUD and other federal regulations and the City of Cleveland's Citizen Participation Plan, a prescribed method of soliciting citizen involvement and consultation was followed in preparing the 2004 Consolidated Plan. Public meetings/hearings and other comment opportunities were provided to the public and various agencies and organizations which are involved in community development in Cleveland.

Public Meetings

As prescribed by the Citizens Participation Plan and CDBG rules, two public hearings/meetings will be held for public comment and input. The first public meeting will be held in the City Council room of the Cleveland Municipal Building, 190 Church St. NE, on Monday, March 22, 2004, 4 p.m. The primary purpose of the meeting is to solicit comments and input from the public for consideration for the 2004 Consolidated Plan. After a presentation from Community Development staff, the floor will be opened for public comments/input.

Copies of the minutes of these meetings will be on file in the Community Development office for public review.

Consultation

As part of the Consolidated Planning process, the City Community Development Department consulted with various City departments, committees, public service organizations and others. From these consultations came identification of needs, funding proposals and recommendations. The following organizations were consulted and invited to provide assistance to the Community Development staff during the process:

Habitat for Humanity
243 Broad Street
P. O. Box 303
Cleveland, TN 37364-0303
Matt Carlson, Executive Director
(423) 432-0454

Cleveland Emergency Shelter
745 Wildwood Avenue
P. O. Box 3297
Cleveland, TN 37320-3297
Harry Johnson, Director Cleveland Community Services

(423) 478-1458
(423) 479-4113 fax

Cleveland Housing Authority
450 Walker Street NE
P. O. Box 2846
Cleveland, TN 37320-2846
Reba M. Powers, Director
(423) 479-9659
(423) 339-5984 fax

Cleveland Community Center
1334 South Church Street
Cleveland, TN 37311
Rita Hannah (South)
Tony Calvin (Northeast)
(423) 559-3322
(423) 559-3380 fax

Bradley County Health Department
201 Dooley Street SE
P. O. Box 1398
Cleveland, TN 37364-1398
Eloise Waters, Director

Bradley/Cleveland Community Services Agency
155 6th Street SE
P. O. Box 3297
Cleveland, TN 37320-3297
Harry Johnson, Director
(423) 479-4111
(423) 479-4113 fax

Bradley/Cleveland Developmental Services
764 Old Chattanooga Pike SW

P. O. Box 29
Cleveland, TN 37364
Walter Hunt, Director
(423) 479-5268
(423) 479-1492 fax

NAACP – Bradley County Branch
P. O. Box 4922
Cleveland, TN 37320-4922
Lawrence Armstrong, President
e-mail: la918@charter.net
(423) 614-6946 home
(423) 421-2937 cell
(423) 780-2008 work
(423) 780-2788 fax

Department of Children's Services (Bradley County)
950 Star Vue Drive SW, Suite 1
Cleveland, TN 37311
Alan Goldstein, Director
(423) 478-0300
(423) 559-4983 fax

Family Violence Program
Family Resource Agency
484 Second Street SE
Cleveland, TN 37311
Angie Faulkner, Director
(423) 479-9339, Ext. 25
(423) 472-4823 fax

Hiwassee Mental Health Center
Behavioral Health Services
1855 Executive Park Place
P. O. Box 1233
Cleveland, TN 37364-1233

David Franz, Executive Director
(423) 479-5454
(423) 479-0403 fax

Horizon Square Apartments
2324 Georgetown Road NW
Cleveland, TN 37311
Kathy Garner, Director
(423) 476-9393
(423) 476-5371 fax

Nancy's House
P. O. Box 5086
Cleveland, TN 37320
Director, Amy Fields, MPH
(423) 559-8592
(423) 559-8559 fax

Ocoee Outreach
1475 Norman Chapel Road
Cleveland, TN 37312
(423) 479-9587
(423) 479-9587 fax
(423) 284-6183 Denise

Priority One
1855 Executive Park Dr NW
Cleveland, TN 37312
Contact- Shelby Tullier
(423) 479-4170
(423) 479-0340 fax

Reality House/Halfway House
1855 Executive Park Dr NW

Cleveland, TN 37312
Faye Henry, Director
(423) 479-0353
(423) 479-0403 fax

United Way of Bradley County, Inc.
85 Ocoee Street SE
P. O. Box 193
Cleveland, TN 37364-0193
Brenda Abel, President and CEO
(423) 479-2020
(423) 339-1110 fax

SETHRA
1012 Resource Road
P. O. Box 909
Dunlap, TN 37327
Riley Anderson, Director
(423) 949-2191
(423) 949-4023 fax

River County Association of Realtors
2070 Candies Lane NW
Cleveland, TN 37312
Kathleen Duke, Executive Director
Alison Howell, President
(423) 476-5912
(423) 478-5964 fax

Drew Robinson, Esq.
100 Black Men
33 North Ocoee Street
Cleveland, TN 37312
(423) 476-5018
(423) 476-9364 fax

Bradley Initiative for Church and Community
1030 6th Street NE
Cleveland, TN 37311
Brenda Hughes
(423) 559-1112
(423) 559-1244 fax

Cleveland Weed and Seed
1075 Blythe Avenue
Cleveland, TN 37311
Dyan Hayes, Director
e-mail: dhayesws@bellsouth.net
(423) 472-3528

Christmas in April
1300 25th Street Plaza
Cleveland, TN 37311
Paul Renner, Director
(423) 476-4581
(423) 476-7782 fax

Exhibit C. HUD Tables

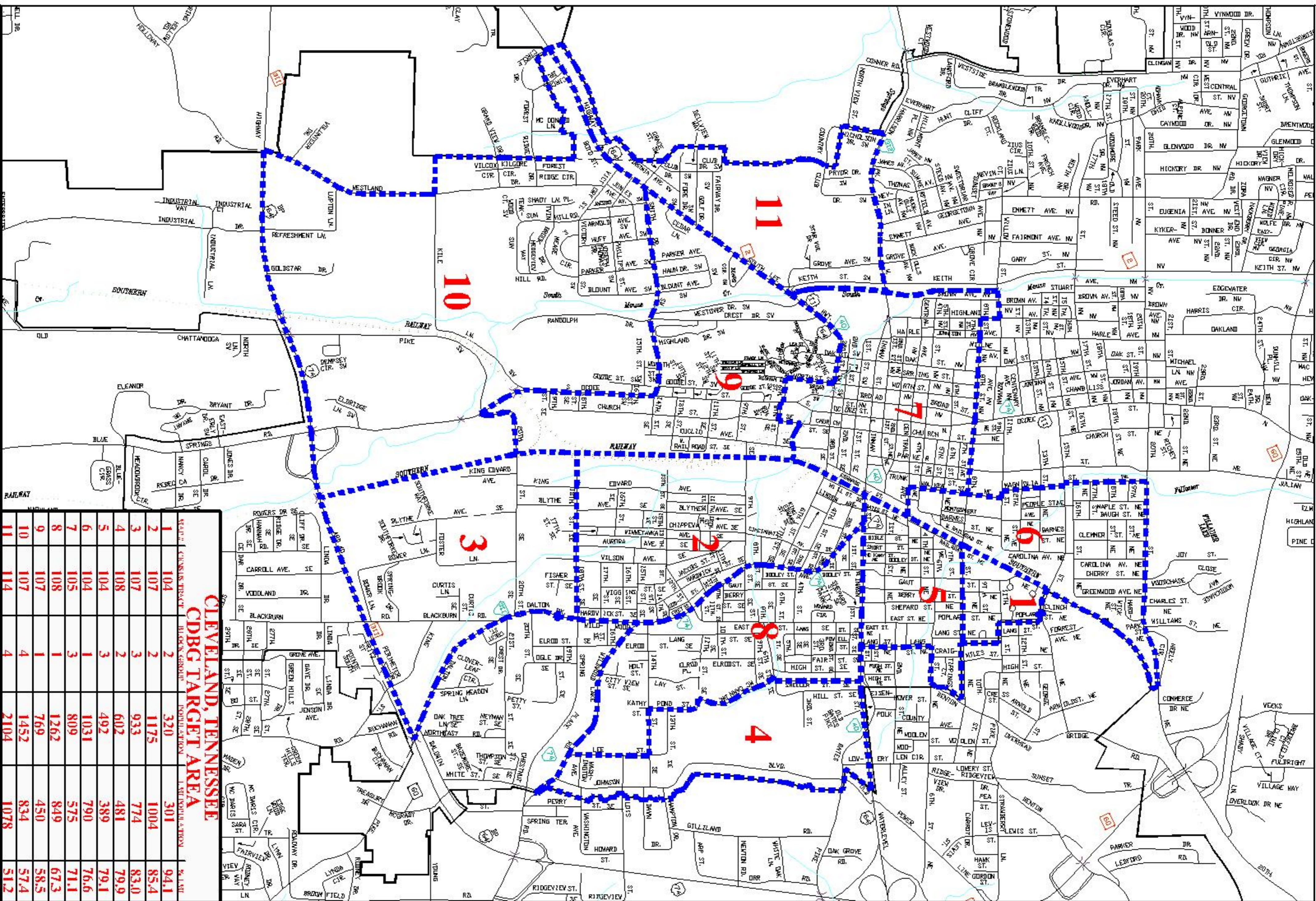
Table 1A
Homeless and Special Needs Population

		Estimated Need	Current Inventory	Unmet Need / Gap	Relative Priority
Individuals					
Example	Emergency Shelter	115	89	26	M
Beds / Units	Emergency Shelter	30	23	7	Low
	Transitional Housing	2	0	2	High
	Permanent Housing	2	0	2	High
	Total	34	23	11	--
Estimated Supportive Services Slots	Job Training	20	15	5	Medium
	Case Management	30	23	7	High
	Substance Abuse Treatment	12	9	3	Low
	Mental Health Care	9	7	2	Low
	Housing Placement	28	21	7	High
	Life Skills Training	30	23	7	High
	Other	--	--	--	--
Estimated Sub- populations	Chronic Substance Abusers	12	9	3	High
	Seriously Mentally Ill	5	4	1	Low
	Dually - Diagnosed	4	3	1	Low
	Veterans	8	6	2	High
	Persons with HIV/AIDS	3	2	1	Low
	Victims of Domestic Violence	3	2	1	Low
	Youth	0	0	0	Low
	Other	--	--	--	--

Persons in Families with Children

Example	Emergency Shelter	115	89	26	M
Beds / Units	Emergency Shelter	35	29	6	Medium
	Transitional Housing	8	0	8	High
	Permanent Housing	8	0	8	High
	Total	51	29	22	--
Estimated Supportive Services Slots	Job Training	23	19	4	Medium
	Case Management	35	29	6	High
	Substance Abuse Treatment	14	12	2	Low
	Mental Health Care	9	7	2	Low
	Housing Placement	33	27	6	High
	Life Skills Training	35	29	6	High
	Other	--	--	--	--
Estimated Sub- populations	Chronic Substance Abusers	14	11	3	High
	Seriously Mentally Ill	6	5	1	Low
	Dually - Diagnosed	5	4	1	Low
	Veterans	9	7	2	Medium
	Persons with HIV/AIDS	4	3	1	Low
	Victims of Domestic Violence	4	3	1	Low
	Youth	5	4	1	Low
	Other	--	--	--	--

Exhibit D. Maps



STREET	CHANGING TRACT	BLK. NO.	IND. LOT	% LOT
1	104	2	320	94.1
2	107	2	1175	85.4
3	107	3	933	83.0
4	108	2	602	79.9
5	104	3	492	79.1
6	104	1	1031	76.6
7	105	3	809	57.5
8	108	1	1262	67.3
9	107	1	769	58.5
10	107	4	1452	57.4
11	114	4	2104	107.8

CLEVELAND, TENNESSEE
CDBG TARGET AREA

TABLE 1B

SPECIAL NEEDS SUBPOPULATIONS	Priority Need Level High, Medium, Low, No Such Need	Unmet Need	Dollars to Address Unmet Need	Goals
Elderly	High	765	\$100,000	
Frail Elderly	High	985	\$150,000	
Severe Mental Illness	Low	475	\$27,500	
Developmentally Disabled	Low	250	\$25,000	
Physically Disabled	Medium	525	\$40,000	
Persons w/ Alcohol/Other Drug Addictions	Low	250	\$25,000	
Persons w/HIV/AIDS	Low	200	\$25,000	
Other				
TOTAL			\$392,500	

City of Cleveland Consolidated Plan.....2004-2009

Exhibit E. HUD Certifications

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the City of Cleveland, Tennessee certifies that:

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

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

Drug-Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under

subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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

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

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

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

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

Tom Rowland, Mayor

Date

Specific CDBG Certifications

The Entitlement Community certifies that:

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

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

Following a Plan -- It is following a current Consolidated Plan that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2001-2002, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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

Excessive Force – The City of Cleveland, Tennessee has adopted and is enforcing:

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

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

Lead-Based Paint – The City of Cleveland, Tennessee’s notification, inspection, testing and abatement procedures concerning lead-based paint will comply with the requirements of 24 CFR 570.608;

Compliance with Laws – The City of Cleveland, Tennessee will comply with applicable laws.

Tom Rowland, Mayor

Date

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

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

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously

identified the workplaces in question (see paragraph three).

6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

City of Cleveland Tennessee
185 2nd Street NE and 190 Church Street NE
Cleveland (Bradley County), Tennessee 37311

Check if there are workplaces on file that are not identified here.

The certification with regard to the drug-free workplace is required by 24 CFR Part 24, subpart F.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Exhibit F. Citizen Comments

TABLE 2A
Priority Needs Summary Table

PRIORITY HOUSING NEEDS (households)	Priority Need Level High, Medium, Low		Unmet Need	Goals	
Renter	Small Related	0-30%	Low	185	--
		31-50%	Low	50	--
		51-80%	Medium	124	50
	Large Related	0-30%	High	254	50
		31-50%	Low	169	--
		51-80%	Low	26	--
	Elderly	0-30%	High	83	30
		31-50%	Medium	55	20
		51-80%	Low	43	--
	All Other	0-30%	Medium	151	50
		31-50%	Low	48	--
		51-80%	Low	21	--
	Owner	0-30%	High	340	100
		31-50%	Medium	245	25
		51-80%	Medium	195	25
Special Needs	0-80%	Medium	182	50	
Total Goals				400	
Total 215 Goals				400	
Total 215 Renter Goals				250	
Total 215 Owner Goals				150	

**TABLE 2B
COMMUNITY DEVELOPMENT NEEDS**

PRIORITY COMMUNITY DEVELOPMENT NEEDS	Priority Need Level High, Medium, Low, No Such Need	Unmet Priority Need	Dollars to Address Unmet Priority Need	Goals
PUBLIC FACILITY NEEDS (projects)				
Senior Centers	Low			
Handicapped Centers	Low			
Homeless Facilities	medium		200,000	
Youth Centers	medium		200,000	
Child Care Centers	medium		200,000	
Health Facilities	low			
Neighborhood Facilities	high		200,000	
Parks and/or Recreation Facilities	high		500,000	
Parking Facilities	No such need			
Non-Residential Historic Preservation	Low			
Other Public Facility Needs	--			
INFRASTRUCTURE (projects)				
Water/Sewer Improvements	Low			
Street Improvements	Medium		500,000	
Sidewalks	High		500,000	
Solid Waste Disposal Improvements	No such need			
Flood Drain Improvements	High		1,000,000	
Other Infrastructure Needs	--			
PUBLIC SERVICE NEEDS (people)				
Senior Services	High		200,000	
Handicapped Services	High		150,000	
Youth Services	Medium		100,000	
Child Care Services	Low			
Transportation Services	High		250,000	
Substance Abuse Services	High		200,000	
Employment Training	Medium		200,000	
Health Services	Low			
Lead Hazard Screening	Low			
Crime Awareness	Low			
Other Public Service Needs	--			
ECONOMIC DEVELOPMENT				

**TABLE 2B
COMMUNITY DEVELOPMENT NEEDS**

ED Assistance to For-Profits(businesses)	Low			
ED Technical Assistance(businesses)	Low			
Micro-Enterprise Assistance(businesses)	Low			
Rehab; Publicly- or Privately-Owned Commercial/Industrial (projects)	Low			
C/I* Infrastructure Development (projects)	Low			
Other C/I* Improvements(projects)	Low			
PLANNING				
Planning	High		100,000	
TOTAL ESTIMATED DOLLARS NEEDED:				

* Commercial or Industrial Improvements by Grantee or Non-profit

Table 2C
Summary of Specific Housing/Community Development Objectives
(Table 2A/2B Continuation Sheet)

Obj #	Specific Objectives	Performance Measure	Expected Units	Actual Units
	Rental Housing Objectives			
C.1.	Increase the supply of housing for large families	Housing units	50	
C.2.	Increase the supply of housing for the elderly	Housing units	100	
	Owner Housing Objectives			
C.3.	Increase the homeownership rate by providing homebuyer assistance programs.	Housing units	100	
C.4.	Improve the quality of the housing stock by rehabilitating owner-occupied housing.	Housing units	50	
C.5.	Provide homeownership counseling	Households	100	
	Community Development Objectives			
D.1.	Concentrated Code Enforcement	Housing units	100	
	Infrastructure Objectives			
D.2.	Sidewalk improvements	Funds	\$200,000	
D.3.	Drainage Improvements	Funds	\$200,000	
	Public Facilities Objectives			
D.4.	Recreation improvements	Funds	\$200,000	
	Public Services Objectives			
D.5.	Public Transportation	Funds	\$200,000	
	Economic Development Objectives			
	Other Objectives			
D.6.	Planning	Funds	\$60,000	