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

1. Introduction

Woodbury became a Community Development Block Grant (CDBG) entitlement jurisdiction and a HOME Investment Partnerships Program (HOME) participating jurisdiction via the Dakota County HOME Consortium in Federal Fiscal Year 2010. Both sources of funding are programs of the US Department of Housing and Urban Development (HUD). Woodbury’s first program year (PY10) ran from July 1, 2010 to June 30, 2011. This 2020-2024 Consolidated Plan includes the 2020 Annual Action Plan (AAP) which governs Woodbury’s use of CDBG and HOME during Program Year 2020 (PY20). PY20 spans from July 1, 2020 to June 30, 2021.

In addition to the PY20 AAP, this 2020-2024 Consolidated Plan includes a market assessment and a needs analysis that helps Woodbury plan how it should invest the next five years’ worth of HUD funding. HUD provided data that was specific to the entire service area of the Dakota County HOME Consortium. This area includes Anoka County, Dakota County, suburban Ramsey County, Washington County exclusive of Woodbury and Woodbury. As such, due to the macro-level of the data, assumptions regarding the needs and investment of funds were made in large part using other data sources or subjective information. Woodbury’s 2040 Comprehensive Plan, for example, acknowledges the City’s share of the regional need for affordable housing is 1,043 units between 2021 and 2030. This acknowledgement of need on its own provides evidence and justification for Woodbury's continued approach to invest CDBG and HOME in affordable housing activities.

CDBG funds are allocated to the City directly by HUD. The City accesses HOME funds through its membership in the Dakota County HOME Consortium. Given the nature of HUD’s digital interface with grantees, this plan is specific to CDBG alone. Information herein about HOME is for reference purposes only as the plans submitted to HUD by Dakota County are the official planning documents for the use of HOME within Woodbury. (For purposes of clarity, Woodbury is subject to a joint powers agreement that establishes the Dakota County HOME Consortium as well as annual sub-recipient agreements that memorialize how HOME funds are used.) Consistent with previous consolidated plans, Woodbury’s HOME Affordability Periods and Resale-Recapture Policy (CD-COMDEV-3.14) is attached as an exhibit within module AD-25. Specific to the PY20 AAP, to meet the timelines established by HUD for accessing the funds on July 1, 2020, this AAP must be approved not later than May 15, 2020 with a public hearing held on March 18, 2020 and an additional community meeting held on April 9, 2020.

The amounts identified below constitute the potential sources of funds for the PY20 activities:

- $239,093 annual CDBG award;
- $50,000 in CDBG program income;
- $17,493 in unexpended prior year CDBG funds;
- $85,690 annual HOME award less $12,854 CHDO setaside;
- $27,108 in HOME program income; and
- $1,500 in unexpended prior year HOME funds.
Program income is projected based on the assumption that CDBG- and HOME-funded loans from past program years are repaid according to schedule.

The City does not anticipate the ability to use HOME funds on a project coordinated by a Community Housing Development Organization (CHDO) because there are no viable CHDOs currently active in Woodbury. As such, of the annual HOME award, only 85 percent will be able to be invested in HOME projects in Woodbury. However, other members of the Dakota County HOME Consortium may have projects eligible for the CHDO setaside ensuring that the funds will be invested in the region.

The City Council adopted a resolution on January 22, 2020 identifying parks and affordable housing as the high priorities for use of HUD funds.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

This Consolidated Plan identifies both the community development needs and the methods to address them as being focused around housing affordability and public facility improvements in areas that are home to higher proportions of low- and moderate-income households than other areas of the City. The map below shows the Census Tract Block Groups in which CDBG may be invested for park projects that are determined to benefit low- and moderate-income households on an area basis (LMA). A playground reconstruction project at Menomini Park, as depicted in the callout box within the map, is within such a Census Tract Block Group and will be recipient of PY20 CDBG funds. HUD has updated its methodology for determining which Census Tract Block Groups are eligible for these types of LMA investments and as such the map below reflects different eligible areas than in the 2015-2019 Consolidated Plan.

Specific to PY20, the AAP proposes to invest $34,286 of CDBG for program administration including but not limited to oversight, program audit, training, affirmatively furthering fair housing, small area studies, affordable housing research, coordination and monitoring of the program and coordination and oversight of HOME expenditures. Not more than the sum of twenty percent of the annual CDBG grant and twenty percent of program income earned during the year may be spent on program administration.

The 2020 AAP also proposes to pay $2,142 of HOME to the Dakota County Community Development Agency (CDA) for program administration given that Woodbury accesses HOME as a member of the Dakota County HOME Consortium. Separate from this administrative fee, the City proposes to invest $5,000 of HOME administrative dollars to procure HOME monitoring services from Affordable Housing Connections to facilitate income- and related-monitoring activities at the HOME-funded projects at The Glen at Valley Creek as well as Cobble Hill.

Separate from the use of CDBG and HOME administrative dollars referenced above, the City will invest $366,603 in projects funded by CDBG and HOME including:

- $204,300 of CDBG for a playground and basketball court reconstruction project in Menomini Park.
- $94,302 of HOME and $68,000 of CDBG to supplement the Woodbury Housing and Redevelopment Authority’s (HRA) levy as funding sources for the Woodbury First-Time
Homeownership Program. These loans are typically issued in $25,000 increments with a 6.3 percent administrative fee paid to NeighborWorks Home Partners.

As identified within the Dakota County HOME Consortium’s Citizen Participation Plan (attached within module AD-25), amendments to activities in an amount less than $100,000 are not considered to be substantial amendments and as such can be processed administratively according to local Woodbury policies and procedures.
3. Evaluation of past performance

Each year, not later than September 30th, the City submits to HUD a Consolidated Annual Performance and Evaluation Report (CAPER) which captures progress toward meeting needs and achieving strategies established in a Consolidated Plan and the Annual Action Plans. Each of the CAPERs that Woodbury has submitted to HUD since 2010 has been accepted and approved by HUD. Woodbury’s most recent CAPER, covering the activities of PY18, was approved by HUD on October 8, 2019.

In the past, Woodbury has been successful in achieving affordable housing goals as well as public facility improvements using CDBG and HOME. The following projects have been funded since 2010 using these HUD funds:

- 2010-present: 46 First-time Homeownership and Foreclosure Purchase Program loans
- 2010-present: fair housing investments via the Fair Housing Implementation Council
- 2010: Expansion of Cree Park
- 2010: Rehab project at Garbe Well Site Park
- 2011: Development subsidy to Twin Cities Habitat for Humanity’s affordable homeownership units constructed in Garden Gate 2nd Addition
- 2016: Rehab project at Carver Lake Park
- 2017: Rehab project at Evergreen West Park
- 2017-2019: Development subsidy to the Washington County CDA’s The Glen at Valley Creek redevelopment
- 2018: Rehab project at Windwood Passage Park
- 2019: Rehab project at Potawatomi Park (construction anticipated to conclude in calendar year 2020)
- 2020: External repairs to the Washington County CDA-owned Cobble Hill project, a 45-unit affordable senior building
- 2020: Rehab project at Ojibway Park

This 2020 AAP notes that due to the seasonality of construction in Minnesota, the projects at Cobble Hill and Ojibway Park, while funded with PY19 dollars will see construction activity within PY20 as well.

4. Summary of citizen participation process and consultation process

In addition to conversations with key housing stakeholders such as the Washington County CDA and a variety of realtors, loan officers and housing developers, formal meetings occurred on the following dates:

1. January 13, 2020 community meeting regarding 2020-2024 Consolidated Plan and 2020 AAP funding priorities;
2. January 22, 2020 Council meeting establishing parks and affordable housing as 2020-2024 Consolidated Plan and 2020 AAP high funding priorities;
3. March 18, 2020 public hearing on draft 2020-2024 Consolidated Plan and 2020 AAP;
4. May 13, 2020 adoption of 2020 AAP;
5. June 10, 2020 authorization of revisions to 2020 AAP transferring oversight and planning of CDBG-CV from the 2020 AAP to the 2019 AAP.
Meetings 1 and 3 were noticed within The Bulletin while meetings 2, 3 and 4 occurred during regularly scheduled City Council meetings.

Separate from the above, a legal notice was published on May 3, 2020 creating a public comment period from May 4, 2020 to May 9, 2020 regarding Woodbury’s allocation of CDBG-CV. This unique timeline is consistent with a waiver granted by HUD.

Additionally, the March 18, 2020 public hearing draft of this 2020-2024 Consolidated Plan referenced an intended community meeting to be held on April 9, 2020. Given the various federal, state and local states of emergency, this community meeting was cancelled with the consent of HUD.

Following the May 13, 2020 City Council action to adopt the 2020-2024 Consolidated Plan, HUD requested that Woodbury detach CDBG-CV funds from the 2020 AAP and rather plan for these dollars via an amendment to the 2019 AAP. Subsequently, a notice of public comment period was published in the St. Paul Pioneer Press on May 31, 2020 creating a public comment period from May 31, 2020 to June 5, 2020. The Woodbury City Council was asked to take formal action amending the 2019 AAP and the 2020 AAP with regard to the CDBG-CV funds at its June 10, 2020 meeting.

5. Summary of public comments

A comment letter was submitted on May 8, 2020 via e-mail from the Woodbury Community Foundation providing updates about the Foundation, and offering to assist the City in determining how best to support the local non-profit community with CDBG-CV funds.

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

N/A. The comment letter received from the Woodbury Community Foundation was generally supportive of the 2020-2024 Consolidated Plan and did not lead to any changes within the Plan.

7. Summary

All CDBG and HOME funds will be invested according to the terms of this 2020-2024 Consolidated Plan and its 2020 AAP with the two core programmatic areas of investment being public facility and affordable housing investments. CDBG-CV will be invested separately as part of an amendment to the 2019 AAP rather than through the 2020-2024 Consolidated Plan and its 2020 AAP.
The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG Administrator</td>
<td>WOODBURY</td>
<td>Community Development</td>
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<td></td>
<td></td>
<td>Department</td>
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</tbody>
</table>

Table 1– Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

The City of Woodbury’s Community Development Department is responsible for managing the CDBG and HOME programs as they are applied in Woodbury. Specifically, Karl Batalden, the City’s Community Development Coordinator has served as the project manager overseeing the development of this 2020-2024 Consolidated Plan and its 2020 Annual Action Plan. The City takes a collaborative approach; however, and has consulted closely with other members of the Dakota County Consortium to ensure consistency in the planning process. Janelle Schmitz, the City’s Community Development Director, as designated by Resolution Number 20-12 of the City Council, serves as the Certifying Officer for environmental reviews and other related matters.
1. Introduction

Please see below.

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

Woodbury’s outreach and consultation strategies include efforts to work both within and without the public sector resources available to the community. Formal and informal relationships exist with housing and service providers. Woodbury held a formally noticed community meeting to gather input on housing, health and services. Additionally, the City’s Community Development Coordinator has been designated as the City’s community affairs liaison to ensure that lines of communication are open and effective between the City and its non-profit and congregational stakeholders.

Woodbury staff meets and consults regularly with housing and social service agencies, private industry, businesses, developers and other entities to enhance coordination and leverage both public and private entities. Examples of these partnerships and consultations include organizations including but not limited to:

- Christian Cupboard Emergency Food Shelf
- CommonBond Communities
- Dominium
- Duffy Development Corporation
- Fair Housing Implementation Council
- HousingLink
- Metropolitan Council
- Minnesota Housing Finance Agency
- Twin Cities Habitat for Humanity
- Washington County CDA
- Woodbury Community Foundation

All of these partners have at some point played a specific role in the implementation of Consolidated Plan programs and activities. Many affordable housing development activities are carried out by non-profit agencies, for-profit developers, and the Washington County CDA. Along with developing and managing affordable housing, the Washington County CDA administers rental assistance programs, rental units, and housing counseling activities. This partnership and leveraging strategy has worked extremely well and has resulted in the provision of many housing and non-housing improvements in Woodbury.

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

Woodbury supports the efforts of and participated in the five metro county Continuum of Care (CoC). Suburban Metro Area Continuum of Care (SMAC) is comprised of; Washington County, Dakota County, Anoka County and Scott/Carver County. Three members of the local
Washington County Housing Collaborative sit on the SMAC Board and provide county specific input on local needs and priorities. The primary functions of SMAC are to provide a comprehensive response to homelessness, to evaluate and coordinate the homeless response system, and to prepare and submit the HUD CoC collaborative funding application on a regional level.

The Washington County Housing Collaborative was developed to address the needs of homeless and persons at risk of homelessness. The collaborative is made up of local non-profit agencies, County Services, CDA, faith community, State representatives, and interested community members. The Collaborative provides an avenue for providers to coordinate and learn of resources available in the community. The Collaborative is the local voice to the SMAC CoC.

To address the needs of homeless persons and most efficiently utilize the resources available in the community, a Coordinated Access system has been developed. The Washington County system has been designed to meet the specific needs of the county in coordination with SMAC and State to assure consistency across counties state wide. Washington County has three points of access for people experiencing homelessness (youth, singles, and families) to be assessed and placed on the waitlist for the appropriate housing to meet their needs. An initial assessment is conducted to determine if the person or family can be diverted from homelessness with connections to resources. If it is determined housing is needed, a full assessment is conducted to determine the type of housing needed: shelter, rapid rehousing, transitional housing, or permanent supportive housing.

The coordinated access system was developed in a collaborative effort with input from non-profit agencies, County Community Services, the CDA, faith community and interested community members.

An example of coordination is the 2013 development of the Views at City Walk. This project resulted from the City investing local funds to acquire property which was then transferred to CommonBond Communities for a dollar who developed a 45-unit tax credit apartment building with a focus on special needs households. As a partnership with the Metro HRA and the Washington County CDA, CommonBond’s social service programming within the apartment building helps those households who were formerly homeless as well as those who might be at risk of becoming homeless.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction’s area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Woodbury is not a recipient of ESG funds.
2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities.

<table>
<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Washington County Community Development Agency</th>
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<tbody>
<tr>
<td><strong>Agency/Group/Organization Type</strong></td>
<td>Housing</td>
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<td>PHA</td>
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<td>Services - Housing</td>
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<td>Services - Children</td>
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<td>Services - Elderly Persons</td>
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<td>Services - Persons with Disabilities</td>
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<td>Services - Persons with HIV/AIDS</td>
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<td>Services - Victims of Domestic Violence</td>
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<td>Services - Homeless</td>
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<td>Services - Health</td>
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<td>Services - Education</td>
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<td>Services - Employment</td>
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<td>Service - Fair Housing</td>
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<td>Services - Victims</td>
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<tr>
<td>Other government - County</td>
<td>Community Development Financial Institution</td>
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<tr>
<th>What section of the Plan was addressed by Consultation?</th>
<th>Housing Need Assessment</th>
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<td>Lead-based Paint Strategy</td>
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<td>Public Housing Needs</td>
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<td>Homelessness Strategy</td>
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<td>Homeless Needs - Chronically homeless</td>
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<td>Homeless Needs - Families with children</td>
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<td>Homelessness Needs - Veterans</td>
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<tr>
<td>Homelessness Needs - Unaccompanied youth</td>
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<tr>
<td>Non-Homeless Special Needs</td>
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<td>HOPWA Strategy</td>
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<td>Economic Development</td>
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<td>Market Analysis</td>
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<td>Anti-poverty Strategy</td>
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<p>| How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | While the WCCDA is not itself a CDFI, it contracts with MCCD for their Open to Business Program. Open to Business has access to CDFI funds via its parent non-profit, MCCD, and is able to provide non-bank capital, counseling and other economic development assistance to small business entrepreneurs which helps provide opportunity to households and job-seekers in the community. |</p>
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<tr>
<th></th>
<th>Agency/Group/Organization</th>
<th>Agency/Group/Organization Type</th>
<th>What section of the Plan was addressed by Consultation?</th>
<th>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</th>
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<tr>
<td>2</td>
<td>CommonBond Communities</td>
<td>Housing, Services - Housing, Services-Elderly Persons, Services-Persons with Disabilities</td>
<td>Housing Need Assessment, Non-Homeless Special Needs, Market Analysis</td>
<td>City staff and CommonBond staff met to discuss housing opportunities specific to rental needs of low- and moderate-income households in the community. CommonBond may be able to construct additional affordable housing using financial models that are different from the other competitive and over-subscribed sources available within the region.</td>
</tr>
<tr>
<td>3</td>
<td>Christian Cupboard Emergency Food Shelf</td>
<td>Services-Children, Services-Elderly Persons, Services-Persons with Disabilities, Services-Persons with HIV/AIDS, Services-Victims of Domestic Violence, Services-homeless, Services-Health</td>
<td>Non-Homeless Special Needs, Food Services</td>
<td>City staff met with the previous executive director several times to discuss who CCEFS serves the community and where the gaps in institutional structures exist.</td>
</tr>
<tr>
<td>4</td>
<td>Duffy Development Corporation</td>
<td>Housing, Services - Housing, Services-Children, Services-Persons with Disabilities</td>
<td>Housing Need Assessment, Market Analysis</td>
<td>City staff has meets frequently with representatives of Duffy Development not only in their capacity as an owner of three LIHTC projects in the community but also to learn best practices and innovative ideas about funding additional new construction of affordable housing.</td>
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<tr>
<td>5</td>
<td>HousingLink</td>
<td>Housing, Services - Housing, Service-Fair Housing</td>
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| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Market Analysis |
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<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>The City has procured services of HousingLink to present to local landlords to discuss fair housing. Woodbury has also evaluated using HousingLink’s rental revue tool to offer better ground-level data on housing choice in the community.</td>
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<tr>
<td><strong>6</strong> Agency/Group/Organization</td>
<td>Metropolitan Council - Metro HRA</td>
</tr>
</tbody>
</table>
| Agency/Group/Organization Type | Housing  
PHA  
Services - Housing  
Service-Fair Housing  
Other government - Local  
Regional organization  
Planning organization |
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Market Analysis |
| How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Woodbury staff meets frequently with a wide variety of Metropolitan Council staff regarding both planning and funding affordable housing. Woodbury values this relationship and has benefited in the past from the availability of project-based vouchers via Metro HRA. |
| **7** Agency/Group/Organization | MINNESOTA HOUSING FINANCE AGENCY |
| Agency/Group/Organization Type | Housing  
Services - Housing  
Services-homeless  
Other government - State |
| What section of the Plan was addressed by Consultation? | Housing Need Assessment  
Public Housing Needs  
Homelessness Strategy  
Homeless Needs - Chronically homeless  
Homeless Needs - Families with children  
Homelessness Needs - Veterans  
Homelessness Needs - Unaccompanied youth  
Market Analysis |
<p>| How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Woodbury staff meets frequently with a wide variety of MHFA staff regarding both planning and funding affordable housing. Woodbury values this relationship and has benefited in the past from the counsel of MHFA staff regarding how best to position applications for success. |</p>
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<thead>
<tr>
<th>Agency/Group/Organization</th>
<th>Agency/Group/Organization Type</th>
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<tbody>
<tr>
<td>Twin Cities Habitat for Humanity</td>
<td>Housing</td>
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<td>Services - Housing</td>
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<td>Civic Leaders</td>
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<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
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<tr>
<td></td>
<td>Market Analysis</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Woodbury is home to the most TCHFH-constructed homes in the metro outside of Minneapolis and St. Paul. City staff met with TCHFH staff to explore future builds and hopes to leverage local TCHFH volunteers for future projects.</td>
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<tr>
<th>Agency/Group/Organization</th>
<th>Agency/Group/Organization Type</th>
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<tbody>
<tr>
<td>Woodbury Community Foundation</td>
<td>Services-Health</td>
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<td>Services-Education</td>
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<td>Services-Employment</td>
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<td></td>
<td>Business Leaders</td>
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<td></td>
<td>Civic Leaders</td>
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<td></td>
<td>Business and Civic Leaders</td>
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<td></td>
<td>Foundation</td>
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<tr>
<td>What section of the Plan was addressed by Consultation?</td>
<td>Housing Need Assessment</td>
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<td></td>
<td>Economic Development</td>
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<td></td>
<td>Anti-poverty Strategy</td>
</tr>
<tr>
<td>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</td>
<td>Woodbury’s mayor and Community Development Coordinator both serve on the board of the Foundation. In the past, housing was one of four core areas of service for the Foundation. As the Foundation reinvigorates itself housing may again become a topic for engagement.</td>
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</tbody>
</table>

**Identify any Agency Types not consulted and provide rationale for not consulting**

All agency types were consulted. New to the 2020-2024 Consolidated Plan cycle is the requirement to plan for broadband internet service providers and to narrow the digital divide. As part of the Mayor’s Business Outreach Strategy, the mayor and city staff meet on an annual basis with Comcast and CenturyLink who provide these services to the Woodbury community. These annual meetings lead to effective planning and service delivery.

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

<table>
<thead>
<tr>
<th>Name of Plan</th>
<th>Lead Organization</th>
<th>How do the goals of your Strategic Plan overlap with the goals of each plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continuum of Care</td>
<td>Suburban Metro CoC</td>
<td>Counter and prevent homelessness</td>
</tr>
<tr>
<td>ThriveMSP 2040</td>
<td>Metropolitan Council</td>
<td>Increased supply of affordable housing</td>
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<tr>
<td>Regional AI</td>
<td>FHIC</td>
<td>Identify impediments to fair housing and corresponding mitigation strategies</td>
</tr>
<tr>
<td>Housing Policy Plan</td>
<td>Metropolitan Council</td>
<td>Increased supply of affordable housing</td>
</tr>
</tbody>
</table>

| Table 3– Other local / regional / federal planning efforts |
Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

See below.

**Narrative**

As the administrator of the CDBG and HOME, Woodbury has informal and formal partnerships with the Washington County CDA, the Metropolitan Council, Washington County government, local and regional non-profits, and the Minnesota Housing Finance Agency to provide and maintain housing, services and economic development activities which inform this Consolidated Plan and will be integral in its implementation. Additionally, the City has played an active role within the Fair Housing Implementation Council in their work on the 2020 regional analysis of impediments to fair housing. It is important when it comes to fair housing to recognize that this is a topic that crosses municipal boundaries and effective planning and communication with neighboring communities is a must.

At the time of the March 18, 2020 public hearing draft of this plan, in accordance with Minnesota State Statutes 331A.04, the *The Bulletin* (formerly known as *The Woodbury Bulletin*) was designated as Woodbury’s newspaper of record for all legal publications including but not limited to ordinances, ordinance summaries, notices of hearings, certain resolutions, notices of elections and other matters the City Council may deem advisable and in the public interest to be published. With the permanent closure of *The Bulletin*, the City has switched its newspaper of record to the *St. Paul Pioneer Press*. Consequently, the May 3, 2020 and May 31, 2020 notices of public comment period were published in the *St. Paul Pioneer Press*. 
PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

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

During the process of preparing this Consolidated Plan, the City of Woodbury held a community meeting on January 13, 2020 to gather input regarding the planning process and to determine priorities for funding. The City Council then took subsequent action at its January 22, 2020 meeting to designate funding priorities for both the 2020-2024 Consolidated Plan and its 2020 Annual Action Plan. On March 18, 2020, the City of Woodbury held a public hearing regarding the draft Consolidated Plan. Notices were published in *The Bulletin* prior to the above-referenced community meeting and the public hearing. These legal notices were published on January 1, 2020, and March 4, 2020.

The notices for the meetings provided the purpose and dates of the meeting and encouraged interested parties to submit input during the planning process. Each of the notices provided the locations of the meeting(s) and direct-dial as well as e-mail contact information. Contact information was provided as well as information on how to submit comments.

Following the March 18, 2020 public hearing, the City held a comment period opening on March 19, 2020 and closing on May 4, 2020. It was the intent of the City to hold a community meeting on April 9, 2020 to review the draft 2020-2024 Consolidated Plan. Given the COVID-19 pandemic, the various states of emergency and executive orders, and the City's commitment to safety, Woodbury received a waiver to cancel this meeting. Subsequently, with the passage of the CARES Act, the 2020-2024 Consolidated Plan was amended to address how the $140,672 of CDBG-CV would be invested in the community. Consistent with a waiver from HUD, a notice of public comment period was printed in the *St. Paul Pioneer Press* on May 3, 2020 creating a comment period running from May 4, 2020 through May 9, 2020. This process is consistent with the waiver processes identified by HUD related to COVID-19.

The 2020-2024 Consolidated Plan and its 2020 Annual Action Plan were approved by the City Council via resolution on May 13, 2020. Subsequently, HUD has requested that the City detach the CDBG-CV funds from the 2020 AAP and rather plan for these dollars within an amendment to the 2019 AAP.

HUD's IDIS system includes tables as part of its online review system that describe the mode of outreach for the above-referenced citizen participation events. HUD's system is problematic, because their web-based IDIS system only allows grantees to select one mode of outreach when, in fact, the City uses multiple methods of outreach.

The most current version of the Dakota County Consortium's Citizen Participation Plan is attached as an appendix within module AD-25. This appendix identifies the required number of public hearings, length of comment periods and more. It also identifies a substantial amendment to the plan as one that modifies an activity's budget by $100,000 or more at one time.
### Citizen Participation Outreach

#### Table 4– Citizen Participation Outreach

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Mode of Outreach</th>
<th>Target of Outreach</th>
<th>Summary of response/attendance</th>
<th>Summary of comments received</th>
<th>Summary of comments not accepted and reason</th>
<th>URL (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Public Meeting</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.rivertowns.net">www.rivertowns.net</a></td>
</tr>
<tr>
<td>2</td>
<td>City Council Meeting</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.woodburymn.gov">www.woodburymn.gov</a></td>
</tr>
<tr>
<td>3</td>
<td>Public Hearing</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.rivertowns.net">www.rivertowns.net</a></td>
</tr>
<tr>
<td>4</td>
<td>Newspaper Ad</td>
<td>Non-targeted/broad community</td>
<td>One comment letter was received from the Woodbury Community Foundation which was generally supportive of the City’s efforts.</td>
<td>See above</td>
<td>N/A.</td>
<td><a href="http://www.twincities.com">www.twincities.com</a></td>
</tr>
<tr>
<td>5</td>
<td>City Council Meeting</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.woodburymn.gov">www.woodburymn.gov</a></td>
</tr>
<tr>
<td>6</td>
<td>Newspaper Ad</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.twincities.com">www.twincities.com</a></td>
</tr>
<tr>
<td>7</td>
<td>City Council Meeting</td>
<td>Non-targeted/broad community</td>
<td>No responses were generated</td>
<td>No comments were received</td>
<td>N/A.</td>
<td><a href="http://www.woodburymn.gov">www.woodburymn.gov</a></td>
</tr>
</tbody>
</table>
Needs Assessment

NA-05 Overview

Needs Assessment Overview

A main component of any consolidated plan is a needs assessment. Due to the unfortunate reality of how HUD operates its online eConPlanning Suite in IDIS, and because Woodbury accesses HOME funds as a sub-recipient member of the Dakota County HOME Consortium, all of the tables and data for Woodbury’s consolidated plan that were pre-populated by HUD use data that is reflective of the entire Consortium’s geographic area which includes Anoka, Dakota, Ramsey and Washington Counties, with the exception of the City of St. Paul. Woodbury’s population represents roughly three percent of the Consortium’s population. As such, the pre-populated data is not able to be used to assess Woodbury’s needs at the municipal level. Additionally, the tables that are pre-populated by HUD use data that is significantly dated.

In December 2019, Woodbury contacted the Minneapolis HUD field office regarding this data anomaly but HUD was not able to provide assistance or enhanced data. In fact, HUD informed Woodbury staff that it need not attempt to break the regional CHAS data down to the local level. This statement is similar to statements made to Dakota County staff as well as the membership of NACCED.

While the information from HUD may not be as helpful as a grantee might wish for, Woodbury has a variety of data sources and planning documents that allow it to assess its need. For example, Woodbury’s 2040 Comprehensive Plan is less than a year old and its various chapters identify the need for more than 1,000 new units of affordable housing in the 2021 to 2030 decade. Additionally, the Washington County CDA commissioned a comprehensive housing needs assessment in 2017 that reflects the need for additional owner-occupied, rental and senior housing options in Woodbury, across all income levels.

While this Consolidated Plan does not have objective data regarding disproportionate needs regarding housing affordability and housing problems, this Consolidated Plan does put an emphasis on housing needs being high priorities for the investment of CDBG and HOME. Separate from the purview of this planning document, the City is in the process of updating its housing action plan in 2020 that will examine a broad range of housing topics as opposed to the narrow range of housing topics explored by this Consolidated Plan. For example, data from the Metropolitan Council from March 2018 identifies that 1,602 households in Woodbury in 2016 earned less than 50 percent of the area median income and were housing cost-burdened. Clearly these households would be potential beneficiaries of the Woodbury’s Neighborhood Reinvestment Fund; however, this program is not a federally-funded program.

With regard to the public housing and homelessness needs in Woodbury, the Washington County CDA serves as the PHA for Woodbury, and Washington County Community Services leads the efforts to combat as well as prevent homelessness. The City has been supportive of the Washington County CDA’s efforts to convert its public housing units to tenant-based rental assistance options which will hopefully make these scarce dollars more nimble in the community.

With regard to non-housing community development needs, the recent LMSID data available from HUD clearly identifies the census tract block groups in which greater proportions of low- and moderate-income households live in the community. This data, combined with the city
recently passing the milestone of fifty years of incorporation helps city planners to determine where investments in parks and public facilities need to be made to ensure that low- and moderate-income households have equitable access to public facilities.
1. **Describe the number and type of single person households in need of housing assistance.**

As part of the eConPlanning Suite process for the creation of consolidated plans, HUD has provided pre-populated data tables at the consortium level using data from the 2011-2015 ACS. Given that age of this data and the small portion of the overall Dakota County HOME Consortium that Woodbury constitutes, this question is challenging to answer. Additionally, the tables that are provided do not specifically address “single person households in need of housing assistance”.

As such, to answer this question, Woodbury has reviewed 2013-2017 ACS data made available via mncompass.org and notes that there are 5,067 householders living alone in Woodbury. The same data source reports projects that 21.4 percent of Woodbury households are housing cost-burdened. As such, this consolidated plan estimates that there are 1,084 single person households in need of housing assistance.

Woodbury is focusing on cost-burdened households to answer this question. Table DP-04 of the 2017 ACS suggests that there are zero households in Woodbury that are lacking complete plumbing facilities or complete kitchen facilities.

2. **Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Data from the Woodbury Public Safety Department reports that in calendar year 2017, Woodbury responded to calls for service regarding:

- Domestic Disturbances -- 378
- Domestic Assault -- 91
- Social Service Referrals -- 280
- Harassing Communications – 148 (not all are of a domestic nature)
- Violations of Orders – 56 (not all are of a domestic nature)

The City stresses; however, that there is no statistically valid causal link between these types of calls for service and needs for housing assistance.

3. **What are the most common housing problems?**

Table DP-04 of the 2017 ACS suggests that there are zero households in Woodbury that are lacking complete plumbing facilities or complete kitchen facilities.

Table DP-04 of the 2014-2018 ACS suggests that there are only 45 housing units in Woodbury out of 25,098 that have 1.51 or more occupants per room. As such, this consolidated plan does not suggest that over-crowding is a concern in Woodbury.
The pre-populated data tables from HUD do not provide the information about cost-burden or severe cost-burden at the Woodbury level. As such, this plan relies on information Table DP-04 of the 2014-2018 ACS which suggests that 19.5 percent of Woodbury homeowners with a mortgage pay more than 30 percent of their income for housing costs while 38.7 percent of Woodbury renters pay more than 30 percent of their income for housing costs.

This ACS data implies that renter households in Woodbury are more likely to be experiencing common housing problems, especially related to experiencing housing cost-burden.

4. Are any populations/household types more affected than others by these problems?

Information provided by HUD in the pre-populated tables for the Dakota County HOME Consortium notes that there is a much larger volume of households earning less than 30 percent of the area median income who are experiencing severe cost-burden than other income demographics. This data point is likely correct in Woodbury as well as the consortium as a whole.

5. Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.

The two of the best measures of households that have the potential to become homeless are income and housing costs. Renter households with extremely low incomes (less than 30% AMI) and high housing costs (50% or more of income) are at an imminent risk of homelessness. Also, subpopulations are vulnerable to homelessness and include people leaving institutions, victims of domestic violence, non‐elderly, low-income, single-person households and members of families living in overcrowded, unstable conditions. However, insufficient data is available to estimate the number of such subpopulations living in Woodbury.

To assist low income households at imminent risk of homelessness Woodbury collaborates with agencies to sponsor programs aimed at providing affordable housing, self-sufficiency training, employment, job training, emergency rental assistance, foreclosure counseling, and other supportive services. Washington County Community Services provides crisis assistance services to households facing the prospect of homelessness. The services include motel/hotel shelter, direct assistance to assist the household in obtaining housing like application fees or security deposits, and advisory services.

6. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates

Woodbury collaborates with and supports the Suburban Metro Area Collaborative (SMAC) for Continuum(s) of Care (CoC). Under the Coordinated Access program, rolled out in 2015, more information became available regarding at-risk populations. See Section NA 40 for the homeless population estimates and the description of the methodologies used.
7. Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Historically, two of the most accurate measures of households that have the potential to become homeless are income and housing costs. Renter households with extremely low incomes (less than 30% AMI) and high housing costs (50% or more of income) are at an imminent risk of homelessness.

8. Discussion

For the purpose of the planning document regarding the investment of CDBG and HOME, housing affordability appears to be a greater need than other housing needs in Woodbury. However, there are households who may have needs for energy-efficiency improvements, accessibility improvements, or assistance with fixing code-related housing safety items.
NA-15 Disproportionately Greater Need: Housing Problems – 92.205 (b)(2)

1. Discussion
Per HUD definitions, a disproportionate need exists when the members of any racial or ethnic group has a housing need that is 10% or higher than the total population. The four housing problems considered in this analysis include: lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding of more than one person per room, and housing cost burden greater than 30% of a household’s income.

The table above is a compilation of data using the 2011-2015 CHAS data provided to the Dakota County Consortium and is not specific to Woodbury alone. Based on this data, there are four population groups, as identified in red italics above that appear to be suffering a disproportionate need:

- African American households earning 30% - 50% of AMI;
- Asian households earning 30% - 50% of AMI;
- Pacific Islander households earning 0% - 30% of AMI
- Pacific Islander households earning 50% - 80% of AMI

Please note, from a data perspective, that the CHAS data provided by HUD reflects that there are only four Pacific Islander households earning between 50% and 80% of AMI in the entire Consortium’s geographic area. As such, the statistical significance of that group being seen as suffering from a disproportionate need solely in Woodbury is not robust.
1. Discussion

Per HUD definitions, a disproportionate need exists when the members of any racial or ethnic group has a housing need that is 10% or higher than the total population. The four housing problems considered in this analysis include: lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding of more than 1.5 persons per room, and housing cost burden greater than 50% of a household’s income.

The table above is a compilation of data using the 2011-2015 CHAS data provided to the Dakota County Consortium and is not specific to Woodbury alone. Based on this data, there are three population groups, as identified in red italics above that appear to be suffering a disproportionate need:

- Asian households earning 30% - 50% of AMI;
- Asian households earning 50% - 80% of AMI;
- Pacific Islander households earning 0% - 30% of AMI

Please note, from a data perspective, that the CHAS data provided by HUD reflects that there are only thirty Pacific Islander households earning between 0% and 30% of AMI in the entire Consortium’s geographic area. As such, the statistical significance of that group being seen as suffering from a disproportionate need solely in Woodbury is not robust.
NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

1. Discussion:

A disproportionately greater need exists when the members of racial or ethnic group, at a given income level, experience cost burden (30-50%) or severe cost burden (50% +) at a greater rate (10 percentage points or more) than the income level as a whole.

<table>
<thead>
<tr>
<th></th>
<th>Not Cost-Burdened</th>
<th>Cost-Burdened</th>
<th>Severely Cost-Burdened</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jurisdiction as a Whole</td>
<td>74%</td>
<td>15%</td>
<td>10%</td>
</tr>
<tr>
<td>White</td>
<td>76%</td>
<td>15%</td>
<td>9%</td>
</tr>
<tr>
<td>African Amer.</td>
<td>57%</td>
<td>23%</td>
<td>21%</td>
</tr>
<tr>
<td>Asian</td>
<td>73%</td>
<td>16%</td>
<td>11%</td>
</tr>
<tr>
<td>Amer. Indian</td>
<td>67%</td>
<td>19%</td>
<td>14%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>67%</td>
<td>4%</td>
<td>29%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>59%</td>
<td>22%</td>
<td>18%</td>
</tr>
</tbody>
</table>

The table above is a compilation of data using the 2011-2015 CHAS data provided to the Dakota County Consortium and is not specific to Woodbury alone. Based on this data, there are two population groups, as identified in red italics above that appear to be suffering a disproportionate need regarding housing cost burden:

- African American households experience severe cost-burden at a disproportionately high rate
- Pacific Islander households experience severe cost-burden at a disproportionately high rate

Please note, from a data perspective, that the CHAS data provided by HUD reflects that there are only thirty Pacific Islander households experiencing severe cost burden in the entire Consortium’s geographic area. As such, the statistical significance of that group being seen as suffering from a disproportionate need solely in Woodbury is not robust.
NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

1. Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

As discussed in Section NA-15, NA-20 and NA-25 above, it would appear that

- With regard to housing problems the following groups suffer most notably (NA-15):
  - African American households earning 30% - 50% of AMI;
  - Asian households earning 30% - 50% of AMI;
  - Pacific Islander households earning 0% - 30% of AMI
  - Pacific Islander households earning 50% - 80% of AMI
- With regard to severe housing problems the following groups suffer most notably (NA-20):
  - Asian households earning 30% - 50% of AMI;
  - Asian households earning 50% - 80% of AMI;
  - Pacific Islander households earning 0% - 30% of AMI
- With regard to housing cost burdens (NA-25) African American and Pacific Islander households appear to experience severe housing cost-burden disproportionately.

1. If they have needs not identified above, what are those needs? N/A.

2. Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Woodbury has not seen evidence that any of its neighborhoods are seeing concentrations of racial or ethnic groups. This plan stresses that neither racial nor ethnic identity is causal of housing need.

However, the map below as created using HUD’s CPDMaps tool in 2015 show that there may be more households of an African American background living in the westerly portions of Woodbury than other portions of the City. This map, while dated, is from approximately the same time as the 2011-2015 CHAS data that is used in the tables in the needs assessment section above.
1. Introduction

The City of Woodbury does not operate a public housing authority. Rather, Woodbury residents who require various forms of rental assistance are served by the Washington County Community Development Agency (WCCDA). The City of Woodbury in 2019 adopted a resolution in support of the WCCDA’s proposed public housing conversion program.

WCCDA also administers the Housing Choice Voucher program on behalf of all communities within the county. Washington County has an allocation of 145 vouchers. The WCCDA also administers, on average, 355 portable vouchers for a total of 500 vouchers. The large number of portable vouchers being used in Washington County demonstrates that Washington County is a good place to live for voucher holders and that the demand for vouchers far surpasses Washington County’s allocation. Via the Metro HRA, there are 15 project-based vouchers serving Woodbury households.

The City of Woodbury notes that the WCCDA has not received any official communication from HUD, or other unit of government, regarding the termination of any programs or assistance that finance the ongoing operations of any non-WCCDA owned affordable housing units in Woodbury (i.e. no documented expirations of Section 8 contracts). Nor does the WCCDA anticipate any additions of affordable housing units by other units of government.

As of January 2020, the waiting list for Washington County CDA public housing and Housing Choice voucher programs is 44 for the tenant-based voucher program, 36 for the property-based units at Raymie Johnson, 654 for the scatter site public units, and 401 at Whispering Pines. The lengthy wait lists for the public housing units and vouchers points to the unmet need for public housing and Housing Choice vouchers in Washington County.

The City of Woodbury notes that the data found in the tables in this document was presented to Woodbury via the e-Con Planning Suite initiative of HUD as accessed via the Integrated Disbursement and Information System (IDIS). The data is a broader geographic level than the Woodbury level and this plan notes that the WCCDA serves as the PHA for Woodbury’s residents and other stakeholders.

1. Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

As noted above, The City of Woodbury notes that the data found in these tables was presented to Woodbury via the e-Con Planning Suite initiative of HUD as accessed via the Integrated Disbursement and Information System (IDIS). The data is not at the Woodbury level which makes sense given that Woodbury does not serve as a PHA. The City of Woodbury fully supports the efforts and operations of WCCDA and aligns with the WCCDA position statements as follows in acknowledgement of the fact that Woodbury stakeholders may benefit from WCCDA operations and resources outside of the municipal boundaries of the city.

In Washington County, the need for accessible units is reflected by the percentage of households currently occupying available, accessible units. There are six accessible units at Raymie Johnson Estates, one unit in the scattered site public housing program and two units at
Whispering Pines for a total of nine accessible units. Of the nine accessible units, five are occupied by households who requested an accessible unit.

 Resident-interest applications (wait list applications) for Raymie Johnson and the Public Housing units’ requests information about disabilities. The form does not however, differentiate between physical disabilities that would necessitate an ADA unit or developmental or other disabilities that do not require and ADA unit. Because wait list requests for ADA units are not tracked, the need for accessible units can only be assessed by the current usage of ADA designated units. Based on current tenancy, the need for accessible units does not appear to be particularly high. Only 56% of the accessible units are occupied by households needing accessibility features.

The two ADA accessible units at Whispering Pines Apartments have roll in showers and front-facing appliance controls. The building and unit floor plan for the other units present few, if any, barriers for residents with physical disabilities with an entrance at grade, an elevator, hallways and units that are all on one level, and showers with low thresholds and seats. Other than two sets of stairwells that connect the floors, there are no stairs in the building making the build very accessible. Currently the two ADA units are occupied by households who requested an accessible unit. One of the MHOP scattered site units is ADA accessible. This home is currently not occupied by a household that requested an accessible unit.

The Raymie Johnson project-based development has a 96-unit high-rise building for seniors and those with disabilities that is set up much like Whispering Pines, with few, if any physical barriers. An elevator provides access to all floors and all parts of the building, low threshold showers, and no steps outside of those in the stairwells that connect floors. This building has four ADA accessible units with modifications similar to Whispering Pines. Currently two of the four units are occupied by residents who requested accessible units. Raymie Johnson also has 24 units of townhomes. Two of the units are accessible, on one floor, a roll-up kitchen counter, front-facing appliances, wheelchair accessible showers, roll-up bathroom sinks and other accessibility modifications. The other 22 units are two-story units. Currently one of the two ADA units is occupied by a household who requested an accessible unit.

2. What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

The City of Woodbury does not administer the section 8 program or public housing programs.

3. How do these needs compare to the housing needs of the population at large?

A survey of ADA units affordable rental housing owned by the Washington County CDA (non-public housing or Project Based Rental Assisted) show only 24 of 41, or 59% of the ADA units occupied by a resident requesting an accessible unit. This reflects similar overall use rates of 56% for ADA units in Washington County’s Public Housing and Project-Based Rental Assisted units.

According to Maxfield Research and Consulting’s 2017 Update of Comprehensive Housing Needs for Washington County, MN, employment growth in the Twin Cities and limited housing development has resulted in low vacancy rates and high demand for additional housing. There is
a need for 4,834 additional rental housing units between 2016 and 2030 and demand for 13,166 units of owner-occupied housing. “Although the median income in Washington County was $76,300 in 2016, the average wage was $39,800 for jobs located in the county. As a result, many Washington County workers cannot afford market rate housing in Washington County unless they have two or more incomes in the household.” According to the study, 44% of all renter households are cost burdened, paying more than 30% of their income on rent. For households with incomes at or below $35,000, 76% are cost burdened.

The “2017 Washington County Transit Needs Study” notes a concentration or population and employment opportunities in the western portion of the county, also a short commuting distance to Minneapolis and Saint Paul. “Woodbury, Cottage Grove and Oakdale are the three most populous cities. Combined, they account for 50% of the total countywide population. Overall, Washington County’s employment density (concentration of jobs in specific areas) is relatively low, which presents a challenge to planning adequate transportation access to worksites around Washington County.”

Existing fixed-route bus service is largely limited to commuter transit to St. Paul and Minneapolis. Regularly scheduled transit services are unavailable to meet transit demands in most of Washington County’s cities and towns.

4. Discussion

As of January 2020, the wait list for Washington County CDA public housing and Housing Choice voucher programs compared to the number of units/vouchers is 44/145 for the tenant-based voucher program, 36/120 for the property-based units at Raymie Johnson, 654/56 for the scattered site public units, and 401/40 at Whispering Pines.

Washington County has an allocation of 145 vouchers. The Washington County CDA also administers, on average, 355 portable vouchers for a total of 500 vouchers. The large number of portable vouchers being used in Washington County and the lengthy wait lists for the public housing units and vouchers illustrates the unmet need for public housing and Housing Choice vouchers in Washington County.
NA-40 Homeless Needs Assessment – 91.205(c)

1. Introduction:

Woodbury supports its public housing authority, the Washington County CDA when it comes to services and data connected to homeless needs. The data and analysis below is specific to Washington County, but given that about one in four Washington County residents are also Woodbury residents, the overlaps connect. All tables below regarding homelessness are using information at the county level and should not be construed as a statistically significant survey for the City of Woodbury.

This data is a glimpse into the need we have in Washington County, though the circumstances of the count can greatly influence the numbers recorded each year. The methodology of the count has varied in terms of whether schools were involved, whether the weather permitted easy access for street outreach workers to conduct their count, and whether the same number of surveyors were available and actively participating in the count each year. In 2016, a new definition of chronic homelessness went into effect and the count did not include those who were in shelter. In 2018, the schools were very involved in the collection of surveys to students and their families. In 2019, the schools at the state level were directed to change their privacy policy. Therefore, no schools were involved in the 2019 count.

| Table - Washington County Point-in-Time (PIT) Count¹ |
|---------------------------------|----------|----------|----------|----------|----------|
| Total Number of People counted  |
| 2015                            | 168      | 119      | 172      | 227      | 179      |

2. Homeless Needs Assessment

Washington County, via the Homeless Management Information System (HMIS), was able to calculate the number of persons who have become homeless and counted within its Coordinated Entry system (CE) as well as how long those who have entered CE were homeless prior to their assessment. 22.6% of those served in Washington County through the CoC CE system can be classified as those who are chronically homeless. This is a total of 936 households out of a total of 4,145 households who have been assessed into our CE system. 7% of those served in Washington County on average are veterans and 21% are fleeing domestic violence.²

It is challenging to estimate how many people will become homeless in a year. As stated previously, there are indicators that lead to homelessness but it is difficult to estimate who will actually become homeless. Households’ resiliency, access to services, etc. is too hard to predict.

¹ Source: Washington County Point-in-Time Count 2015-2019
² HMIS MN Core Report, pulled 2/18/2020
Table – Estimated # of Persons Experiencing Homelessness in Washington County

<table>
<thead>
<tr>
<th></th>
<th>Sheltered</th>
<th>Unsheltered</th>
<th>Estimate the # experiencing homelessness each year</th>
<th>Estimate the # becoming homeless each year</th>
<th>Estimate the # exiting homelessness each year</th>
<th>Estimate the # of days persons experience Homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Persons in Households with Adult(s) and child(ren)</td>
<td>40</td>
<td>20</td>
<td>240</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Persons in households with only Children</td>
<td>6</td>
<td>2</td>
<td>32</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Persons in households with only Adults</td>
<td>2</td>
<td>32</td>
<td>136</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Chronically Homeless Households</td>
<td>10</td>
<td>8</td>
<td>72</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Veterans</td>
<td>2</td>
<td>3</td>
<td>20</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

3. Nature and Extent of Homelessness: (Optional)

Table – Homeless Count by Race & Ethnicity, Washington County, 2019

<table>
<thead>
<tr>
<th>Race</th>
<th>Sheltered</th>
<th>Unsheltered</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>43</td>
<td>9</td>
<td>52</td>
</tr>
<tr>
<td>Black/African-American</td>
<td>32</td>
<td>7</td>
<td>39</td>
</tr>
<tr>
<td>Asian</td>
<td>8</td>
<td>3</td>
<td>11</td>
</tr>
<tr>
<td>American Indian/Native Alaskan</td>
<td>4</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Multiple Races</td>
<td>15</td>
<td>2</td>
<td>17</td>
</tr>
<tr>
<td>Don't Know/Refused</td>
<td>17</td>
<td>39</td>
<td>56</td>
</tr>
<tr>
<td>Total</td>
<td>119</td>
<td>60</td>
<td>179</td>
</tr>
</tbody>
</table>

Ethnicity

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Sheltered</th>
<th>Unsheltered</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Hispanic</td>
<td>98</td>
<td>19</td>
<td>117</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>4</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Don’t Know/Refused</td>
<td>17</td>
<td>39</td>
<td>56</td>
</tr>
<tr>
<td>Total</td>
<td>119</td>
<td>60</td>
<td>179</td>
</tr>
</tbody>
</table>

---

3 Source: Washington County Point-in-Time Count 2019

2020-2024 WOODBURY

Consolidated Plan

OMB Control No: 2506-0117 (exp. 06/30/2018)
4. Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

See the tables above.

5. Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The sheltered and unsheltered data above is derived from the 2019 Point-in-Time count. The estimated Number of People Experiencing Homelessness Each Year is the total number of sheltered and unsheltered multiplied by four. This assumes the average length of homelessness is 90 days so that the Point-In-Time count only captures one fourth of the annual total. Homeless households with children are more likely to be sheltered than those with only adults due to the supply of shelter in the community. Most shelters in the community are designated for families. The majority of unaccompanied youth were unsheltered, also pointing to the fact that the majority of the county’s shelters are for families rather than single adults or youth. The majority of chronic households were also found in shelter rather than unsheltered, indicating that the community’s shelters are targeting those with the highest need.

6. Discussion:

Based on the 2019 Point-in-Time Count, there are estimated to be 179 households experiencing homelessness on any given night in Washington County. Of these, 119 were sheltered with another 60 unsheltered. The majority of single adults surveyed in the 2019 Point-in-Time Count were unsheltered compared to the majority of families surveyed were sheltered. The general population data in Washington County does not mirror the demographic data captured in the 2019 Point-in-Time Count. This indicates that people of color are disproportionately represented in Washington County’s homeless population. Washington County noted in its Consolidated Plan that the consistent number in those who are homeless in the Point-in-Time Count from 2015-2019 shows that Washington County needs to continue to support services and outreach to those who are experiencing homelessness in the community.
### Table – Homeless Characteristics of 2019 Point-In-Time Count

<table>
<thead>
<tr>
<th></th>
<th>Households</th>
<th>People</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sheltered</td>
<td>57</td>
<td>119</td>
</tr>
<tr>
<td>Unsheltered</td>
<td>52</td>
<td>60</td>
</tr>
<tr>
<td>Chronic Homeless (1 year or more or 4 times in the past 3 years)</td>
<td>16</td>
<td></td>
</tr>
<tr>
<td>Family (an adult with at least one child under age 18)</td>
<td>36</td>
<td></td>
</tr>
<tr>
<td>Single</td>
<td>73</td>
<td></td>
</tr>
<tr>
<td>Victim of Domestic Violence</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>109</td>
<td>179</td>
</tr>
<tr>
<td>Sheltered</td>
<td></td>
<td>119</td>
</tr>
<tr>
<td>Unsheltered</td>
<td></td>
<td>60</td>
</tr>
<tr>
<td>Adults</td>
<td></td>
<td>62</td>
</tr>
<tr>
<td>Children (under age 18)</td>
<td></td>
<td>45</td>
</tr>
<tr>
<td>Served in Military</td>
<td></td>
<td>5</td>
</tr>
<tr>
<td>Employed Adults</td>
<td></td>
<td>17</td>
</tr>
<tr>
<td>Full time (7), Part time (10)</td>
<td></td>
<td>17</td>
</tr>
</tbody>
</table>
NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

1. Introduction:

Non-Homeless Special Needs are defined as housing and service needs for persons or households who are elderly, are frail elderly, have a mental, physical, and/or developmental disability, have alcohol or other drug addictions, have HIV/AIDS or are victims of domestic violence or stalking. Some data connected to these populations is available via the ACS at the Woodbury level. Other data, however, is county-wide data. Although Woodbury and Washington County are separate entitlement jurisdictions, many of the supportive services and housing are provided to all county residents by Washington County’s Community Services Department; therefore, using a variety of datasets is appropriate. Woodbury understands that CDBG funds cannot be used to provide housing or services for non-Woodbury residents.

2. Describe the characteristics of special needs populations in your community:

According to Table DP02 of the 2018 American Community Survey, 4,988 out of 71,116 the civilian noninstitutionalized population living in Woodbury have a disability. Of these 4,988 residents, 2,491 are older than 65 years old. While other tables of the American Community Survey such as S1810 provide information about types of special needs, the population numbers are small enough that the information is redacted by the Census Bureau to prevent observers of Census data from discovering private information.

3. What are the housing and supportive service needs of these populations and how are these needs determined?

Each of these groups has its own unique housing needs with varying degrees and types of supportive services.

Elders and Frail Elders
The housing needs of the elderly are projected to grow as the baby boomer generation ages and advances in medical technology extend the average lifespan. Elders and frail elders may face increasing housing cost burdens or may need home modifications and supportive services that allow them to age in place. In addition, access to transportation, health care, and other public and private resources, facilities, and services are considered when weighing housing options. The need for specialized or retrofitted housing and supportive services will continue to grow as elderly populations increase. Policies seeking to accommodate frail elders should incorporate affordability, accessible design in both residential and group homes, and increased supportive services to meet the needs of an aging population.

Persons with Disabilities
Persons with disabilities face a range of housing related issues. Many people with disabilities who rely on Supplemental Security Income payments fall into this category. The amount of benefit received as part of the Supplemental Security Income program places a person in the HUD “extremely low-income limit” group. Limited income may mean that persons with disabilities face severe cost burdens. Besides affordability, persons with disabilities also face issues related to accessibility in housing, aging caregivers, and housing discrimination. As with elders, access to transportation, health care, and other facilities and services are important factors when weighing various housing options. Financing for housing rehabilitation and modification to allow persons with disabilities to function independently or make homes
accessible will continue to be a critical need. Overall, the most common housing problems for persons with disabilities is affordable, accessible, safe housing that is integrated into their chosen community.

**Persons with substance use disorders**
Dependence on drugs and/or alcohol is one of the most significant risks that alcohol or drug user faces, as it can lead to health problems. Health problems resulting from substance abuse can cause a financial burden, lead to a physical or mental disability, and also an inability to work. In addition to health concerns and health care needs, addictive disorders disrupt relationships with family and friends and can cause people to lose their jobs. For those already struggling financially, a loss of income could also cause them to lose their housing. It is also important to note that substance abuse disorders can be a result of a loss of housing rather than a cause as substance use can be a coping mechanism for those in difficult situations.

**Victims of domestic violence, dating violence, sexual assault, and stalking**
Victims of domestic violence face a variety of economic barriers to self-sufficiency. They may lack access to financial resources due to the actions of their abuser. Residents of public or subsidized housing may face an added challenge as the abuser may be the one on the lease. A lack of affordable housing causes longer stays in shelters. This, in turn, causes shelters to be full which may lead to families being turned away.

4. **Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

Funding priorities are identified through the efforts of the Minnesota HIV/AIDS Housing Coalition, which convenes monthly for all stakeholders. The current needs are summarized by the Coalition in a Status Report distributed annually to identify the housing supply and the perceived demand by those within the HIV/AIDS community at risk of homelessness. It includes information about funding sources, housing inventory/availability and HIV/AIDS epidemiology trends. Woodbury is not a recipient of HOPWA and as such does not have a dedicated funding source from HUD to serve households with AIDS.

5. **Discussion:**

The special needs population in Woodbury is a substantial one that requires services tailored to the needs of each group. Non-homeless special needs populations encompass a wide variety of persons and households and cannot be easily categorized except in very general terms. Many are coping well with their situations and the need for public assistance. Some have needs that can only be met with help from outside their family. Some are on the verge of homelessness themselves and struggle from day to day. Some live independently, while others depend on family or caregivers to help them on a daily basis. Needs for these populations are as varied as the populations are themselves and depend on individual situations. The housing needs for this population are similar to other low-income individuals. However, because of their limited income, many of these individuals may live in either unsafe or substandard housing. These citizens benefit from case management, support services, and outpatient treatment services to monitor and treat their mental illness. Woodbury benefits from a strong non-profit sector in the east metro as well as the social work services offered by the Washington County Community Services staff.
Describe the jurisdiction’s need for Public Facilities:

In Woodbury, the need for public facilities is met through a combination of city and county services, supplemented by a vibrant non-profit sector. Most public improvements such as park and recreation facilities, public safety stations and libraries, are coordinated by the City with County and State financial assistance available from time to time depending on the nature of the project or size of the infrastructure. Woodbury’s Parks and Recreation Department offers programming for senior and youth services. Partnerships with the local school district and Washington County focus on educational opportunities and ECFE programs for parents of children. Non-profits such as Woodbury Lutheran Church and the Christian Cupboard work on essential services and are supported by the fundraising and advocacy work of the Woodbury Community Foundation.

The City utilizes a rolling five-year capital improvement plan to identify which facilities need to be upgraded, when and what potential costs will be. Separate from the five-year capital improvement plan, Parks and Recreation Department staff track the ages and conditions of public facilities and from time to time equipment replacement projects are undertaken using CDBG in LMA-eligible census tract block groups.

How were these needs determined?

Public facilities needs are primarily determined by city staff who are professionally certified in facility maintenance, planning and other relevant skillsets. The City recognizes that it has a large amount of park and recreation public facilities that are beginning to age and will need to be replaced over the coming years. As such, the City’s Parks and Recreation Department had begun to formalize a process that will identify what the roughly $70 million in needs are for Woodbury’s public facilities, when the replacements and repairs will need to be accomplished and how they will be funded. These needs are separate from transportation, sewer, and water infrastructure, which are determined and identified as part of the municipal comprehensive planning process.

Describe the jurisdiction’s need for Public Improvements:

In Woodbury, the need for public improvements is met through a combination of city and county services with occasional financial support from the State alongside of the Metropolitan Council’s ownership and management of the regional sewer system. In 2014, Woodbury adopted an updated ADA transition plan and as such accessibility to public facilities is in better shape than some other communities report. When it comes to street improvements, the City convened a citizen task force to determine how best to react to the maintenance needs of the local street network. The City is still largely a new developing community and brownfield sites requiring significant cleanup are not problematic in the community. Utilities, sidewalks, flood and drainage improvements and playgrounds are coordinated by city staff with participation by the development community. When it comes to playground facilities for special needs households, the East Ridge High School-HealthEast Sports Center campus currently offers a Miracle Field as well as a fully accessible playground and splash pad as coordinated by the Madison Claire Foundation.
How were these needs determined?

The need for public improvements is often determined by a combination of technical analyses, stakeholder input, and staff coordination. Public improvements tend to be linked to infrastructure components of the City, some of which have well-defined lifespans while others do not. At its core, the determination of public improvement needs is planned for by the 2040 Comprehensive Plan, the City’s various infrastructure plans and then by the City’s 5-year capital improvement plans. The 2040 Comprehensive Plan is the city’s principal land use and infrastructure planning tool and the creation of it was overseen by a resident task force appointed by the City Council.

Describe the jurisdiction’s need for Public Services:

Public services in Woodbury are offered by a combination of various public sector entities with support from the non-profit sector. Housing counseling and homelessness prevention services are coordinated by the Washington County CDA. Transportation services are coordinated by the Metropolitan Council. The planned METRO Gold Line along with the proposed additions of local circulator buses from the Metro Transit Service Improvement Plan may increase access to transit options in the coming years. Employment training is offered by the Washington County Workforce Development Center and is supplemented by the recent initiatives of the Woodbury Area Chamber of Commerce. A variety of senior services and other programming from the Woodbury Parks and Recreation Department offer discounted fees for households earning less than 80% of AMI as determined by HUD.

How were these needs determined?

Given that most public services eligible for CDBG funding are provided by Washington County Community Services, this consolidated plan focuses its priorities on affordable housing as well as improvement to public facilities in LMA-eligible census tract block groups.

Housing Market Analysis Overview:

The data provided by HUD for this plan is largely at the Dakota County HOME Consortium level. Based on HUD guidance, Woodbury has not disaggregated the CHAS data to the Woodbury level. Interested parties can contact Woodbury staff, review Woodbury’s 2040 Comprehensive Plan, information via mncopmass.org and so forth. Data from the 2017 comprehensive housing needs assessment commissioned by the Washington County CDA notes the following findings:

- Projected demand for 5,516 new housing units from 2016 to 2030
- This demand consists of 2,926 ownership units, 1,662 general-occupancy rental units and 928 senior housing units
- Of the demand for senior housing units 46 percent are active senior units
  - 35 percent are assisted living senior units
  - 13 percent are memory care senior units and
  - 6 percent are congregate senior care units
**Housing Market**

The 2013-2017 ACS (as presented via mncompass.org) suggests that 17 percent of owner households and 39 percent of renter households are cost-burdened in Woodbury. This indicates that the affordability of the current housing inventory in Woodbury is not sufficient to meet the needs of all Woodbury households. Low vacancy rates and high projected future demand for more rental units means that rents will likely rise in the future making housing more unaffordable for low income households. At the same time, incomes in the Twin Cities MSA have continued to rise which help households pay higher rents.

**Public and Assisted Housing**

The Washington County CDA administers all of the public housing units in Washington County. Of these units, only the scattered-site Holman units are located in Woodbury and the CDA is in the process of converting these units to tenant-based rental assistance units.

**Housing Stock Available to Serve Persons with Disabilities and Special Needs**

Several programs in Washington County serve Woodbury residents with disabilities and special needs yet there remains a gap for transitional and supportive housing serving these populations. The existing housing stock is generally provided by non-profit organizations with case management services provided by Washington County and rental assistance provided by the Washington County CDA.

**Homeless Facilities, Housing, and Services**

In Washington County, there are both permanently available beds at an emergency shelter as well as beds available on an overflow basis. In addition, there are 50 beds available at transitional housing facilities and an additional 35 beds available at permanent supportive housing facilities. Transitional housing facilities are meant to be temporary housing, usually with supportive services, to help stabilize a household moving to independent, permanent housing and are generally available for period up to 24 months.

**Regulatory Barriers**

Woodbury does not have regulatory barriers restricting affordable housing. Utilities are available in the city for future development and the city has a long history of facilitating affordable housing through tactical use of and leverage of LIHTCs, CDBG and HOME, and other sources. Woodbury has just completed its decennial update to its comprehensive plan which identified multiple sites guided for future development of high density or mixed use projects which could accommodate affordable housing developments.

**Economic Changes**

Woodbury’s 2018 Economic Development Strategic Plan includes two strategic goals:

1. Promote Woodbury as a Community of Choice
2. Optimize Development and Redevelopment Opportunities
1. Introduction

The Woodbury housing market is growing and diverse. The market has a wide range of housing options from subsidized apartments to executive homes.

As noted in the recently adopted 2040 Comprehensive Plan, the Metropolitan Council projects that Woodbury will add 2,700 households between 2021 and 2030, and the Metropolitan Council’s 2040 Housing Policy Plan has also forecasted that Woodbury would need to add 1,043 units of affordable housing as its fair share of the region’s affordable housing need. Adding this number of affordable housing units would mean that 39 percent of total projected household growth in Woodbury for the 2021-2030 decade would consist of affordable housing.

This allocation of affordable housing need is based on assumptions regarding the proportion of low-income households and the number of affordable housing units built by the private market. This analysis of need and local allocation are separate from how the housing and development industries function and are not supported by the free market.

From a pragmatic economic perspective, while the City recognizes and accepts its need to plan for 1,043 units of new affordable housing to be constructed in Woodbury between 2021 and 2030, the City believes it is unlikely that this quantity of new affordable units will actually be constructed during said timeframe. The current allocation of 39 percent (1,043 units) of all new households is a greater proportion than the 27 percent allocation (2,057 units) from 2011 to 2020.

2. Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

1. Seven low income housing tax credit housing developments in Woodbury serve 463 households below 60 percent of AMI.
   - Ashwood Ponds—39 units
   - The Glen at Valley Creek—42 units (age-restricted)
   - Lakeside—40 units
   - Legends of Woodbury—216 units (age-restricted)
   - Pondview—40 units
   - Sienna Ridge—41 units (note 5 units have supplementary funding from project-based Section 8 vouchers via the Metro HRA)
   - Views at City Walk—45 units (note 4 units have supplementary funding from project-based Section 8 vouchers via the Metro HRA)(also note that 15 percent of the units must be rented to special needs households)

2. A Brush With Kindness has performed emergency repair services for one general occupancy household below 80 percent of AMI financed in part by municipal HRA levy funds.

3. Stonecrest Senior Living serves 33 senior households below 50 percent of AMI financed by TIF.

4. Twin Cities Habitat for Humanity has sold homes to 73 general occupancy partner families below 50 percent of AMI using CDBG and HOME.

5. Two Rivers CLT serves one general occupancy household below 80 percent of AMI using CDBG and HOME.
6. Washington County CDA operates 42 scattered site general occupancy public housing units that are marketed as MHOP. These are in the process of conversion.
7. Washington County CDA serves 45 senior households below 60 percent of AMI financed by tax exempt bonds with a levy debt service guarantee at Cobble Hill.
8. Woodbury HRA has issued loans to 242 general occupancy households via the First-Time Homeownership Program and the Neighborhood Reinvestment Fund using HRA levy funds, CDBG and HOME (note that when CDBG and HOME funds were used the CDBG and HOME income requirements were met).

The state housing finance agency has and continues to operate a variety of home purchase and home rehab programs that some owners in Woodbury can benefit from. Specific data on this state-level program is not available.

3. Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

It is not anticipated that any of the affordable housing inventory as detailed above will be at risk of being lost from the inventory during the 2020-2024 timeframe governing this Plan. Beyond the expiration of this Consolidated Plan, there are affordable rental units funded by the low income housing tax credit that will reach the end of their Extended Use period of rent affordability and income restrictions required by the IRS. These are financial and housing policy concerns that will become significant areas of focus in a subsequent Consolidated Plan.

4. Does the availability of housing units meet the needs of the population?

Woodbury is within the seven-county Twin Cities metropolitan area. As such, our decennial comprehensive plans includes the guidance of acreage for the potential for future affordable housing. As described in the land use and housing chapters of Woodbury’s 2040 Comprehensive Plan, the estimated need for affordable housing units determined by the Metropolitan Council is not a pragmatic need number based on traditional supply-and-demand or other market analyses, but rather a proportional share of the regional need for affordable housing. Woodbury continues to be among the top five communities in the metro for new units of housing constructed on an annual basis. The City has a historic commitment to housing choice and part of this commitment has been to achieve a 50-50 balance between multi-family and single-family housing stock.

5. Describe the need for specific types of housing:

As noted in Woodbury’s 2040 Comprehensive Plan, the WCCDA commissioned a comprehensive housing needs assessment in 2017 that projects a demand for 5,516 new housing units between 2016 and 2030. This demand can be broken into 2,926 ownership units, 1,662 general-occupancy rental units, and 928 senior housing units. For more information on this topic, readers are encouraged to review Woodbury’s 2040 Comprehensive Plan.

6. Discussion

Woodbury is a desirable place to live with a strong and growing housing market. The presence of households with housing cost-burden; however, indicates that although housing may be available it is not always affordable to low income households. This is particularly true for workers whose average income is not sufficient to afford Woodbury median rents.
MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

1. Introduction

The cost of housing impacts every household’s budget in a manner unique to that household. From a data perspective, the impact of the cost of housing changes dynamically as the costs of housing change while the amount of wages and other households budget factors change as well. According the Metropolitan Council’s March 2018 “existing housing assessment” available via https://metrocouncil.org/Handbook/Files/Existing-Housing-Assessment/02397369_Woodbury_ExistingHsg.aspx, there were 11,081 housing units affordable to residents earning less than 80 percent of the area median income. Given that this assessment assumed there were 25,187 households in Woodbury at the time, one can impute these data points to suggest that 44 percent of Woodbury’s housing stock is affordable to households earning less than 80 percent of the area median income.

The same analysis from the Metropolitan Council suggests that 2,734 households earning less than 80 percent of the area median income are housing cost-burdened. The data from the Metropolitan Council does not discuss households earning more than 80 percent of the area median income who may be housing-cost-burdened. Simple division suggests that 24.7 percent of households in Woodbury who earn less than 80 percent of the area median income are housing cost-burdened.

2. Is there sufficient housing for households at all income levels?

The City of Woodbury has long planned for housing choice and its aspirational commitment to a 50-50 mix of single-family vs. multi-family housing units helps the City to achieve housing diversity. A diverse housing stock in and of itself does not ensure that there is sufficient housing for households at all income levels. However, Woodbury notes that it was one of only six cities to meet the Metropolitan Council’s Livable Communities affordable housing goals during the 1996-2010 time period. Information regarding the next fourteen year time period is not yet available.

This question regarding “all income levels” is subjective in nature. Data from the Metropolitan Council referenced above suggests that there are only 282 housing units in Woodbury that are affordable to households earning below 30 percent of the area median income. Missing from this analysis; however, is information about the demand for such units.

3. How is affordability of housing likely to change considering changes to home values and/or rents?

Home values continue to increase in Woodbury both in terms of new construction housing as well as resale housing. Given the increasing land costs, the increased construction costs due to implementing the new State building code changes, and the general increase in labor and materials costs, this plan does not project that homeownership mortgage or rental lease rates will decline in the near or medium term. In the long-term, if construction of more moderately priced townhomes were to return to the builder portfolio in the region, this might change. A brighter side of the equation might be connected to wages. In fiscal year 2019, for example, the area median income according to HUD reached an all-time high of $100,000. As the economy improves, the number or proportion of households suffering from cost burden may improve as well.
4. How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The latest HOME-funded rental project in Woodbury, the rehab of Cobble Hill, will result in the preservation of existing affordable housing units. The High HOME contract rents less utility allowances will result in one-bedroom units with $837 rents and two-bedroom units with $1,056 rents. These amounts are significantly less than the rents that market-rate rental complexes in Woodbury are receiving. And, the market-rate rental complexes are close to fully leased. As such, the HOME tool is likely only going to be helpful as gap funding for projects that are going to otherwise be funded as affordable housing or as funding for the preservation of existing affordable housing.

While HOME funds are helpful to the community, they are not a main driver of affordable housing. The Low Income Housing Tax Credit tool is far and away the main driver of investment in affordable housing. Specific to Minnesota, there is discussion at the Capitol of greater utilization of housing infrastructure bonds which may prove helpful for the creation of additional affordable housing units. This Consolidated Plan in and of itself represents only a small portion of planning surrounding affordable housing and ought not to be seen as Woodbury’s main affordable housing planning document.

5. Discussion

See above.
1. Introduction

In Woodbury, more than nine out of ten housing units have been constructed since 1980. As such, the community does not face some of the age-based housing repair and improvement needs that some older housing stock in the rest of the county or the urban core areas to our west experience. Woodbury’s municipal HRA offers the Neighborhood Reinvestment Fund which provides three percent interest-bearing loans to low- and moderate-income homeowners funded with the local HRA levy with an interest rate that declines to 2.75 percent for senior and/or veterans.

The data supplied by HUD for this plan regarding selected housing conditions is at a broad consortium-wide level and as such does not provide insight regarding conditions at the Woodbury level. Subjectively, however, as the city is now more than 50 years old, the need for reinvestment in the community’s housing stock is beginning to grow.

1. Describe the jurisdiction’s definition for “substandard condition” and “substandard condition but suitable for rehabilitation”

With regard to use of federal funds, it is important to define standard conditions and substandard conditions but suitable for rehabilitation. Woodbury does not typically use HOME or CDBG in remodel or repair scenarios that trigger these analyses but are aware of the recent shift in the HOME rules requiring the City to use the Uniform Physical Condition Standards (UPCS) which has three levels of violations that can be reported. Inspectable items within each inspectable area are evaluated for possible deficiencies. A deficiency is an observable defect of the inspectable item. Inspectors make observations about the condition of inspectable items and record the condition using the UPCS software in one of three possible ways.

1. No Observed Deficiency (NOD) - The inspectable item has no observed defects.
2. Observed Deficiency (OD) - The inspectable item has one or more observed defects.
3. Not Applicable (NA) - The inspectable item is not applicable for the inspection area. In other words, the item is not present and was not intended to be present.

The inspector must rate each observed deficiency as Level 1, Level 2, or Level 3 according to the definition in the UPCS Dictionary of Deficiency Definitions.

2. Describe the need for Owner and Rental Rehabilitation based on the condition of the jurisdiction’s housing

While the majority of Woodbury’s housing stock is relatively new in comparison to the rest of the Twin Cities metro, there are more than 3,000 housing units that were constructed prior to 1980. This relative youth of the housing stock, combined with the multiple-year trend of decreases in foreclosures leads the City to conclude that its housing stock is in good condition. However, as the community’s housing stock and demographic profile both get older with passing years, the City’s municipal HRA decided to restructure its loan programs and the locally-funded Neighborhood Reinvestment Fund was successful in 2019, its first year. With regard to rental rehabilitation, the community’s property managers continue to both invest and reinvest in the community. Most of these transactions do not require CDBG or HOME with the exception of the Program Year 2019 HOME and CDBG investment into the rehab of Cobble Hill.
which both preserves existing affordable housing and saw UPCS-triggered accessibility improvements.

3. Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

In June of 2004, the State of Minnesota released a plan entitled “2010 Childhood Lead Poisoning Elimination Plan” (State Plan). The State Plan assessed lead risks in Minnesota and set broad goals for eliminating childhood lead poisoning. In general, children less than 6 years of age are perceived to be at a higher risk for lead poisoning. According to the State Plan, there are two risk factors that increase the chance of children being exposed to lead: living in an old home and living in poverty. According to the Minnesota Department of Health, houses built in 1978 or before may have used lead paint on the interior and/or exterior of the house. The State Plan put an emphasis on housing built before 1960.

The State of Minnesota already has a protocol in place for blood level testing. Minnesota Statute (MS 144.9504) and the MDH Childhood Lead Case Management Guidelines for Minnesota dictate responses to different blood lead levels:

- If levels are less than 10ug/dL, information is entered into the surveillance database, and no additional follow-up is pursued.
- If levels 10ug/dL or greater, educational intervention is called for. This includes giving the children’s caretakers a letter and information on how to reduce and/or avoid exposure to lead in the environment.
- If levels 20ug/dL or greater (or 15ug/dL for more than 90 days), environmental follow-up is necessary. This includes assessment of walls, windows, etc.; abatement or hazard reduction; and follow-up sampling.
- Levels of 60ug/dL or greater indicate a medical emergency, and immediate action is taken.

The City of Woodbury follows these state guidelines and will continue to do so.

In 2008, the State Plan reported that 939 of the 96,000 children (less than 6 years of age) receiving blood tests had elevated levels of lead in their blood (10ug/dL). This is slightly less than one percent of all children tested. In the same year of the 3,175 children (less than 6 years of age) tested in Washington County, only eleven had levels between 10ug/dL and 14.9ug/dL. So in Washington County, roughly 0.3 percent of children tested had elevated blood levels that would warrant action. This rate is significantly less than the State average of about one percent. Data is lacking at the municipal level and Woodbury accepts that lead exposure data for the County in this case is likely similar to the exposure risks in Woodbury.

Due to the lack of data, the best way to estimate the number of housing units with possible lead based risks is to estimate the number of housing units constructed in or prior to 1978. Approximately 2,271 housing units were built in or prior to 1978. This represents roughly ten percent of Woodbury’s housing stock. Of these 2,271 identified buildings that were constructed when lead-based paint was commercially available, some may have already been made lead-safe, but these numbers are not available.

Overall, Woodbury has a very low poverty rate of 3.1 percent according to the 2017 ACS. Additionally, when it comes to lead-based paint, it would be statistically inappropriate to assume that a correlation exists between households living in poverty and households living in structures that were constructed in or prior to 1978. As a result, although the City of Woodbury acknowledges
that a lack of data exists, this Consolidated Plan does not identify exposure to lead-based paint hazards as a significant concern either to the LMI households in Woodbury or to the population as a whole.

Using the poverty rate as measure of LMI households, the poverty rate of 3.1 percent (2017 ACS, Table DP03) can be applied to the number of housing units built in or prior to 1978 to estimate the number of LMI households living in housing units with potential exposure to lead-based paint hazards. Using this method, there may be some seventy LMI households living in housing units with a possible lead-based hazard, although, again, this number is not statistically reliable.

4. Discussion

There are needs for housing rehabilitation in Woodbury given that the housing stock is beginning to age. In general, over the next two to three decades, the most common type of residential development in the City will be new development; however, the City is aware that with the progression of time reinvestment and redevelopment will grow in their frequency. A large part of this reinvestment and redevelopment will take place in the shape of home remodeling and rehabilitation.

It is safe to assume that many of the 2,404 owner-occupied units and 814 renter-occupied units that were constructed prior to 1980 will be among the first units to see such reinvestment and redevelopment, although some of these units have already seen considerable remodeling activity.
1. Introduction

The Washington County CDA operated the public housing units throughout the County including 42 scattered site units in Woodbury. They are maintained according to a capital improvement program which incorporates regular inspections to determine future needs as well as an annual capital improvement plan that identifies projects and estimated costs over the next five years to keep the properties in good condition.

Describe the supply of public housing developments:

While there are other public housing developments in the County that have the potential to serve Woodbury residents, there are 42 scattered site units in Woodbury. In addition to these scattered site units, Metro HRA will from time-to-time offer project-based vouchers to affordable housing projects.

2. Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The CDA plans to convert all 105 public housing units to Section 8 rental assistance in 2020 and 2021. Conversion will maintain affordability at the current level for income-qualifying residents. HUD Housing Quality Standard (HQS) inspections will replace REAC inspections for all units. Capital improvements will continue to be funded by the CDA annual capital improvement plan for CDA-owned properties. The nine privately owned units will continue to be privately maintained.

Public Housing Condition

<table>
<thead>
<tr>
<th>Public Housing Development</th>
<th>Average Inspection Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scattered Site</td>
<td>86</td>
</tr>
</tbody>
</table>

Table 5 - Public Housing Condition

3. Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The scattered site properties have all passed the regular REAC inspections, indicating minimal rehabilitation needs. The WCCDA’s capital improvement plan identifies future needs and cost estimates; however, the units in question are in the process of being converted to tenant-based rental assistance projects.

4. Describe the public housing agency’s strategy for improving the living environment of low- and moderate-income families residing in public housing:

The WCCDA’s capital improvement plan identifies future needs and cost estimates on a replacement reserve schedule to ensure a good living environment for the residents. This, along with regular REAC inspections and property management inspections, ensures that rehabilitation needs get identified and addressed as needed.
Discussion:

The Public Housing units in Washington County are well maintained. Deliberate systems improvement projects are scheduled on the WCCDA’s capital improvement plan. For the scattered site units in Woodbury, the reinvestment needs tend to be on a small scale since they are single family units. Such reinvestments tend to focus on maintenance connected to roofing, siding replacement, and driveway repaving.

For the scattered site units in Woodbury, the reinvestment needs tend to be on a small scale since they are single family units. Such reinvestments tend to focus on maintenance connected to roofing, siding replacement, and driveway repaving.

1. Introduction

In Woodbury, homeless facilities and services are coordinated by Washington County and the beds that are available are in neighboring communities within the county with the exception of the month of March when Woodbury Lutheran Church serves as the overflow facility for the St. Paul Area Council of Churches’ “Project Home”.

In Washington County, there are 19 beds between two emergency shelters that are available all year specifically for families. In addition, there are 20 beds available at transitional housing facilities and an additional 35 beds available at permanent supportive housing facilities. Transitional housing facilities are meant to be temporary housing, usually with supportive services, to help stabilize a household moving to independent, permanent housing and are generally available for period up to 24 months.
2. Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Facilities and Housing Targeted to Homeless Households

<table>
<thead>
<tr>
<th></th>
<th>Emergency Shelter Beds</th>
<th>Transitional Housing Beds</th>
<th>Permanent Supportive Housing Beds</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year Round Beds (Current &amp; New)</td>
<td>Voucher / Seasonal / Overflow Beds</td>
<td>Current &amp; New</td>
</tr>
<tr>
<td>Households with Adult(s) and Child(ren)</td>
<td>19</td>
<td>8</td>
<td>20</td>
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<tr>
<td>Households with Only Adults</td>
<td>2</td>
<td>20</td>
<td>10</td>
</tr>
<tr>
<td>Chronically Homeless Households</td>
<td>2</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Veterans</td>
<td></td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>Unaccompanied Youth</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 6 - Facilities and Housing Targeted to Homeless Households

Data Source

Comments:

Washington County’s homeless response system is the result of strong collaboration between homeless providers, citizens and stakeholders in Washington County and throughout the Continuum of Care. Heading Home Washington is the first point of contact of the homeless response system locally and strives to coordinate a wide variety of resources and programs including but not limited to:

- Motel/hotel vouchers for emergency shelter
- Emergency shelter for victims of domestic violence
- Outreach worker and case management to assist homeless youth
- Direct payment assistance to prevent homelessness including food, utilities, medical etc.
- Emergency assistance
- Utility payments
- Rent payment assistance/transitional housing for families, youth and singles (FHPAP, mental health program, Group Residential Housing (GRH), St. Paul Foundation)
- After-hours crisis response team to work with law enforcement regarding children at risk
- Housing case management staff
- Permanent supportive housing—especially for persons with mental illness or chemical dependency issues
• Permanent supportive housing for Veterans and Chronically homeless individuals and families
• Food shelves throughout Washington County (including the Christian Cupboard located in Oakdale)

3. List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

<table>
<thead>
<tr>
<th><strong>Washington County Hired (for MFIP clients)</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td>Job search, counseling and referral for psychological assess., resume writing, mentoring, budgeting, SSI Advocate and housing referral, housing, transportation, childcare, clothing, job training</td>
<td></td>
<td></td>
<td>x</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Family Means</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental Health Counseling, financial counseling, debt repayment, senior support, caregiver support, prevention programs with schools</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>United Way 211 Referral Service</strong></th>
<th>youth</th>
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<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>x</td>
<td>x</td>
<td>x</td>
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</tbody>
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<table>
<thead>
<tr>
<th><strong>Community Action Partnership with Ramsey and Washington Counties</strong></th>
<th>youth</th>
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<th>family</th>
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<tbody>
<tr>
<td>Energy Assistance</td>
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<td>x</td>
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</tr>
<tr>
<td>Employment Services</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Car Ownership</td>
<td>x</td>
<td>x</td>
<td>x</td>
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<tr>
<td>Self-Sufficiency</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Head Start</td>
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<table>
<thead>
<tr>
<th><strong>Senior Linkage Line</strong></th>
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<th>family</th>
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<tr>
<td></td>
<td>x</td>
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<table>
<thead>
<tr>
<th><strong>St. Croix Family Resource Center</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drop-In Center</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Fare for All</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
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<tr>
<td>Bulk food purchase program</td>
<td>x</td>
<td>x</td>
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<table>
<thead>
<tr>
<th><strong>Ascend</strong></th>
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<td>Case Management</td>
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<table>
<thead>
<tr>
<th><strong>Homeline</strong></th>
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</thead>
<tbody>
<tr>
<td>Legal support for renters</td>
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<td>x</td>
<td>x</td>
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<table>
<thead>
<tr>
<th><strong>Housing Link</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td>online rental housing referral and information</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th><strong>Veterans Service Office</strong></th>
<th>youth</th>
<th>single</th>
<th>family</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>x</td>
<td></td>
<td>x</td>
</tr>
</tbody>
</table>

Source: Washington County CDA
MA-35 Special Needs Facilities and Services – 91.210(d)

1. Introduction

There is a larger need for special needs facilities and services in Woodbury than available resources. However, given the effectiveness of the Washington County community’s non-profit sector, this Plan notes the facilities and services available throughout the County in recognition of the fact that residents often live in Woodbury but secure services in neighboring municipalities. There are several programs in Washington County currently available yet there remains a gap for non-homeless special populations.

**Elderly/Frail Elderly**

Elderly and Frail Elderly populations highest need is for health services. The Elderly Waiver and Alternative Care Waiver programs assist elderly and frail elderly residents with supportive services. Persons participating in waiver services must also qualify by income. Once a person is income qualified, they will be eligible and will not have to wait to access supportive services.

Washington County provides case management and other services to elderly and frail elderly. There are 616 assisted living beds, 324 beds for memory care, 231 nursing home beds, and 606 people on the Elderly Waiver Program. Based on the number of elderly/frail elderly population and facilities available, there is a gap for affordable senior housing needs with services.

**Persons with Physical, Mental and Developmental Disabilities**

Services supportive to persons with disabilities are offered through Washington County and non-profit organizations. The Washington County Adult Mental Health Unit is comprised of 16 case managers (social workers) and nurses whose primary function is to provide mental health case management services. Mental health case managers can provide assistance to individuals with a Serious and Persistent Mental Illness (SPMI) by providing resources and referrals which may include housing, transportation, vocational, applying for benefits, social rehabilitation, outpatient individual or group therapy, nursing services, chemical health services, or psychiatric services. Case managers also provide ongoing mental health support through telephone contacts and face to face visits in the community. Most mental health case management services are provided on a voluntary basis.

The Washington County Community Service Department provides case management services for children and adults with developmental disabilities to gain access to needed supports and services. The case manager works on behalf of the person to identify their unique needs and to minimize the impact of the disability on the person's life while assuring continuity of quality services and supports for the person. Case management also includes the coordination and evaluation of services, negotiating and actively promoting access to ordinary and specialized community resources.

Washington County contracts with Canvas Health to provide transitional housing services and a shallow subsidy to individuals who need housing but are not homeless. The individuals who are referred are triaged based on need with transitioning from an institution is the top priority. Washington County Case Workers also work with Phoenix who provides supportive services to individuals who manage their own leases for market rate apartments. As of January 2015, there were 32 persons with mental health concerns who were waiting for supportive and/or transitional housing.
Chemical Dependency
Washington County assists residents through an alcohol/drug abuse health assessment process (also known as Rule 25). In 2013, 420 individuals were assessed and determined to be in need of chemical dependency/drug treatment. According to a 2014 report from the Minnesota Department of Human Services, the total count of people seeking chemical dependency services in Washington County was 1,638 persons. In addition, 579 adults were admitted into detoxification in 2013.

HIV/AIDS
Hope House, located in the city of Stillwater, provides housing and supportive services to persons living with HIV and AIDS. Hope House does not currently have a waiting list for housing and is able to coordinate with other housing providers to provide housing as needed.

2. Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Housing Programs and Facilities for Elderly
According to the WCCDA’s Comprehensive Housing Needs Assessment, as of 2017 Washington County had about 4,140 senior housing units. Roughly one third (1,363) of these are affordable units.

Assisted Living
Within all of Washington County has 838 assisted living units which offer individual apartments with kitchens and a variety of services which include meals, housekeeping, transportation, recreation, and 24-hour supportive personal care services. This Plan specifically notes all of the facilities available in Washington County. The waiting lists are extremely long at these facilities and from time to time a resident who wishes to reside in Woodbury may choose a location in a neighboring community that while not in Woodbury is at least relatively close.

Assisted Living with Memory Care
Washington County has senior facilities that offer units with specialized care for persons with memory care needs including those associated with Dementia and Alzheimer’s disease. This Plan specifically notes all of the facilities available in Washington County. The waiting lists are extremely long at these facilities and from time to time a resident who wishes to reside in Woodbury may choose a location in a neighboring community that while not in Woodbury is at least relatively close.

Housing Facilities for Disabled Persons
The housing needs of persons with disabilities include a need for supportive services ranging from minimal services to robust 24 hour care, all of which can be at an in home setting or at a separate facility. In addition, there is also a need for the housing to be affordable, such as for persons who can live semi-independently with minimal supports, but cannot afford market based rents. People needing this range of housing types include single individuals with disabilities and families consisting of parents with disabilities and their children. The Minnesota Department of Human Services licenses the providers of many of these types of services. For instance, Adult Day Services are non-residential programs that provide individualized and coordinated services aimed at maintaining or improving an individual’s self-care capabilities. Another example is Adult Foster Care programs which provide 24 hour services with lodging, food, supervision and household services. Services may also include living skills or medication...
assistance. The Minnesota Department of Human Services Licensing Information Lookup webpage allows for searches by county for service providers by license type. Currently there are 31 active licensed Adult Foster Care and three active licensed Adult Day Services facilities listed for Washington County. Specific to Woodbury, the municipal HRA partnered with CommonBond Communities and secure Low Income Housing Tax Credits to finance the 45-unit apartment building known as the Views at City Walk using the special needs setaside. As such, at least 15 percent of these units must house households with special needs.

**Housing Programs for Mental Health**

According to Washington County, approximately 25% of persons requesting adult mental health case management services are in need of housing. There are only 89 beds available through 13 programs for permanent supportive housing between Scott, Carver and Washington counties. All of the beds are at 100% capacity with five programs over capacity. As a result, there is a housing gap for adults with mental illness. There are 54 permanent supportive housing units in Washington County. According to Washington County Community Services, there are 32 people with mental health concerns who are waiting for housing.

**Housing Programs for Chemical Dependency**

Washington County assists residents through an alcohol/drug abuse health assessment process. If the assessment recommends chemical dependency treatment, funding through the Consolidated Chemical Dependency Treatment Fund (CCDTF) may be available to pay for the treatment services. CCDTF is a funding source of last resort, and other options for payment must first be explored. There may be a funding gap for persons who are low income but do not qualify for funding through the CCDTF. Housing for persons with chemical dependency issues, on the other hand, is not always readily available once a person has successfully completed treatment. The Washington County CDA provides tenant-based rental assistance through the Shelter Plus Care and state Bridges programs targeted to persons with addition issues.

**Housing Programs for HIV/AIDS**

Supportive housing needs for persons living with HIV and/or AIDS include health care. Hope House provides four units of assisted care for people living with HIV/AIDS who are no longer able to live independently. Licensed under Minnesota rules as Adult Foster Care, Hope House is one of five co-housing facilities in the State and the only one outside the urban core cities of St. Paul and Minneapolis. Residents of Hope House receive: assistance with daily living activities - personal care, cooking, mobility, transportation; food, lodging, protection, household services; social and recreational activities; 24-hour care-partnering services supervised by a care director; and holistic care, providing for the physical, psycho-social, and spiritual needs of each individual, including medication supervision and cash management.

3. **Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Four types of institutional release are described below. They include aging out of foster care, discharges from mental health facilities, discharges from correctional facilities and discharges from hospitals. Protocol is in place in Washington County and in the state of Minnesota that no one is discharged from foster care without a stable home. Washington County has a discharge plan with all foster care youth at age 16 to assure that youth receive notice regarding their rights. They may stay in foster care until age 21 or choose to live independently and work with their case manager to identify and secure a permanent housing option. Discharge plans include housing and employment options.
Protocol is in place so that no one is discharged from a mental health facility without a stable home in which to live. Per state mandate, all persons committed to any of the state regional treatment facilities are assigned a mental health case manager through the county of the person discharged. Discharge planning begins while the individual is committed and before the person is discharged. Housing remains a part of the treatment plan after discharge to ensure housing is maintained/sustained. The plans includes case management services, housing, employment, medical and psychiatric treatment, and aid in the readjustment to the community. In addition, the CoC has received a special allocation of state-funded rental assistance resources designed to facilitate smooth and stable transitions from state psychiatric hospitals to community-based living.

On a statewide level, the current discharge policy reflects policy enacted by the Minnesota Department of Corrections with statutory authority granted by the MN Legislature. MN Department of Corrections (DOC) provides a case manager to offenders and discusses the role of a case manager. In situations where an individual has no placement options or would be homeless follow release, the case manager assists with identifying and connecting the client with appropriate resources. DOC Adult Offender Reentry Services and Programming provides reentry services to offenders in collaboration with case management services. This includes the Presidential Prisoner Reentry Initiative (PRI), transition fairs, administering offender housing contracts, providing referrals, and offering a pre-release class to offenders. DOC provides payment for adult halfway house and emergency housing placement for eligible offenders that are on supervised release and conditional release.

The CoC has been actively engaging representatives from local hospitals and health care providers in 10-year plans to end homelessness. Committees work with hospitals to plan services and referral processes to assist persons being discharged. Releasing medically fragile people who do not have housing is a growing problem. There are medical respite beds available in the metro area and the CoC continues to work with other providers to establish a program that will house persons being released from hospitals without housing to go to. They will be able to stay in this housing until their medical needs are met or permanent housing with needed services is found.

4. **Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

As part of its housing action plan update, the City of Woodbury will examine which types of housing needs should be prioritized for use of CDBG and HOME as well as other sources of revenue.

5. **For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

The City of Woodbury, through its municipal HRA, is actively pursuing an opportunity to create new units of affordable housing within the Urban Village located generally south of Bailey Road and west of Radio Drive. Given the complexities of the timing to secure the private activity bonds needed to leverage the four percent low income housing tax credits necessary for the
project, these units will not likely come on line in the next year but may come on line within the context of the 2020-2024 timeframe of this Plan. The exact number of units and services provided will be determined in the near future.
MA-40 Barriers to Affordable Housing – 91.210(e)

1. Negative Effects of Public Policies on Affordable Housing and Residential Investment

Woodbury rejects the notion that its public policies lead to negative effects on affordable housing and residential development. A Guiding Principle of the 2040 Comprehensive Plan which serves as the primary planning document for the city states that “the City of Woodbury should encourage the development of a diversity of housing to accommodate people of all ages, income levels and family status. The City will identify areas for residential growth in a range of types, styles and affordability while maintaining high quality building standards and amenities.”

Beyond the realm of planning documents, Woodbury’s past performance in affordable housing also is worth noting. At the regional level in the Twin Cities, the Metropolitan Council assigns communities an allocation of affordable housing need and a subsequent Livable Communities affordable housing goal. For the period from 1996-2010, Woodbury met both its affordable ownership and affordable rental goal. Woodbury was one of only six cities in the seven-county area to meet these goals.

From an operational perspective moving forward, Woodbury updated its density policy on September 25, 2019 via Council Resolution 19-146 authorizing Council Directive CD-COMDEV-3.23. This density policy specifically provides the City Council with a tool to offer density bonuses to development projects when affordable housing or assisted living units are the focus of the development. Additionally, the City continues to use the power of its municipal HRA levy to finance affordable housing initiatives.
Introduction

Woodbury hosts a vibrant economy at the municipal level. According Minnesota’s Department of Employment and Economic Development (DEED), our unemployment rate was 2.4 percent in December 2019. Given that most economists consider four percent unemployment to be full employment, Woodbury residents seem to be able to find work. On the other side of the data equation is the number of jobs in Woodbury. Also according to DEED, the third quarter of 2019 saw 1,588 business establishments employ 25,350 workers. The City notes that these numbers are different from the ACS and other data pre-populated by the eConPlanning Suite in IDIS as depicted below. This is likely due to some data sources counting all jobs while others focus on prime jobs.

Economic Development Market Analysis

Business Activity

<table>
<thead>
<tr>
<th>Business by Sector</th>
<th>Number of Workers</th>
<th>Number of Jobs</th>
<th>Share of Workers %</th>
<th>Share of Jobs %</th>
<th>Jobs less workers %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture, Mining, Oil &amp; Gas Extraction</td>
<td>77</td>
<td>43</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Arts, Entertainment, Accommodations</td>
<td>3,052</td>
<td>2,998</td>
<td>10</td>
<td>16</td>
<td>6</td>
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<tr>
<td>Construction</td>
<td>894</td>
<td>264</td>
<td>3</td>
<td>1</td>
<td>-2</td>
</tr>
<tr>
<td>Education and Health Care Services</td>
<td>5,923</td>
<td>5,130</td>
<td>20</td>
<td>27</td>
<td>7</td>
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<tr>
<td>Finance, Insurance, and Real Estate</td>
<td>3,329</td>
<td>1,955</td>
<td>11</td>
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<tr>
<td>Information</td>
<td>1,036</td>
<td>297</td>
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<tr>
<td>Manufacturing</td>
<td>2,492</td>
<td>443</td>
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<td>Other Services</td>
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<td>Professional, Scientific, Management Services</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Retail Trade</td>
<td>3,193</td>
<td>4,819</td>
<td>11</td>
<td>26</td>
<td>15</td>
</tr>
<tr>
<td>Transportation and Warehousing</td>
<td>689</td>
<td>214</td>
<td>2</td>
<td>1</td>
<td>-1</td>
</tr>
<tr>
<td>Wholesale Trade</td>
<td>1,639</td>
<td>384</td>
<td>6</td>
<td>2</td>
<td>-4</td>
</tr>
<tr>
<td>Total</td>
<td>29,234</td>
<td>18,827</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

Table 7 - Business Activity

Data Source: 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

| Total Population in the Civilian Labor Force | 36,690 |
| Civilian Employed Population 16 years and over | 35,185 |
| Unemployment Rate                          | 4.06   |
| Unemployment Rate for Ages 16-24            | 17.17  |
| Unemployment Rate for Ages 25-65             | 2.45   |

Table 8 - Labor Force

Data Source: 2011-2015 ACS
### Occupations by Sector

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number of People</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management, business and financial</td>
<td>13,630</td>
</tr>
<tr>
<td>Farming, fisheries and forestry occupations</td>
<td>1,185</td>
</tr>
<tr>
<td>Service</td>
<td>2,645</td>
</tr>
<tr>
<td>Sales and office</td>
<td>7,860</td>
</tr>
<tr>
<td>Construction, extraction, maintenance and repair</td>
<td>1,050</td>
</tr>
<tr>
<td>Production, transportation and material moving</td>
<td>860</td>
</tr>
</tbody>
</table>

**Table 9 – Occupations by Sector**

**Data Source:** 2011-2015 ACS

### Travel Time

<table>
<thead>
<tr>
<th>Travel Time</th>
<th>Number</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 30 Minutes</td>
<td>21,090</td>
<td>64%</td>
</tr>
<tr>
<td>30-59 Minutes</td>
<td>10,420</td>
<td>32%</td>
</tr>
<tr>
<td>60 or More Minutes</td>
<td>1,420</td>
<td>4%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>32,930</td>
<td>100%</td>
</tr>
</tbody>
</table>

**Table 10 - Travel Time**

**Data Source:** 2011-2015 ACS

### Education:

Educational Attainment by Employment Status (Population 16 and Older)

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>In Labor Force</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Civilian Employed</td>
<td>Unemployed</td>
</tr>
<tr>
<td>Less than high school graduate</td>
<td>395</td>
<td>20</td>
</tr>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>3,190</td>
<td>90</td>
</tr>
<tr>
<td>Some college or Associate's degree</td>
<td>7,510</td>
<td>250</td>
</tr>
<tr>
<td>Bachelor's degree or higher</td>
<td>19,170</td>
<td>540</td>
</tr>
</tbody>
</table>

**Table 11 - Educational Attainment by Employment Status**

**Data Source:** 2011-2015 ACS
Educational Attainment by Age

<table>
<thead>
<tr>
<th>Age</th>
<th>18–24 yrs</th>
<th>25–34 yrs</th>
<th>35–44 yrs</th>
<th>45–65 yrs</th>
<th>65+ yrs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 9th grade</td>
<td>0</td>
<td>15</td>
<td>65</td>
<td>60</td>
<td>310</td>
</tr>
<tr>
<td>9th to 12th grade, no diploma</td>
<td>390</td>
<td>95</td>
<td>115</td>
<td>230</td>
<td>240</td>
</tr>
<tr>
<td>High school graduate, GED, or alternative</td>
<td>975</td>
<td>730</td>
<td>725</td>
<td>2,645</td>
<td>1,955</td>
</tr>
<tr>
<td>Some college, no degree</td>
<td>1,890</td>
<td>1,130</td>
<td>1,310</td>
<td>2,840</td>
<td>1,455</td>
</tr>
<tr>
<td>Associate's degree</td>
<td>215</td>
<td>1,140</td>
<td>905</td>
<td>1,835</td>
<td>275</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>705</td>
<td>3,950</td>
<td>3,980</td>
<td>6,185</td>
<td>1,325</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>45</td>
<td>1,435</td>
<td>2,745</td>
<td>4,230</td>
<td>1,030</td>
</tr>
</tbody>
</table>

Table 12 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Median Earnings in the Past 12 Months</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than high school graduate</td>
<td>25,956</td>
</tr>
<tr>
<td>High school graduate (includes equivalency)</td>
<td>36,965</td>
</tr>
<tr>
<td>Some college or Associate's degree</td>
<td>43,449</td>
</tr>
<tr>
<td>Bachelor's degree</td>
<td>62,742</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>85,751</td>
</tr>
</tbody>
</table>

Table 13 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the data above as well as review of data from DEED and the city’s 2018 Economic Development Strategic Plan, the largest employment sector in Woodbury continues to be education and health services. Woodbury is home to the Woodwinds Hospital and has created a medical campus district within its zoning structure. As such, Woodbury has been increasingly successful in branding itself as a medical destination.

In addition to education and health services, Woodbury’s location at the intersection of I-94, I-494 and I-694 have led to strong retail and finance sectors. All in all, employment within Woodbury is very diverse which leads to a strong sense of economic competitiveness.

Describe the workforce and infrastructure needs of the business community:

The residents of Woodbury have high educational attainment, with the 2018 ACS reporting that 60.9% of residents 25 or older hold a bachelor’s or higher degree. This educational attainment is critical to the industry sectors such as education and health services which—according to MN DEED—constitute 27 percent of the workforce in Woodbury.

For the future workforce in the community, Woodbury is happy to recognize that it hosts numerous public and private sector educational institutions. Additionally, the Woodbury Area
Chamber of Commerce hosts a business education partnership to help grow the future workforce.

From an infrastructure perspective, many residents commute to work outside of Woodbury which requires a strong transit and transportation network. This is seen in the fact that according to the 2011-2015 ACS data noted above there are about 10,000 more workers than jobs in the community and that 36 percent of workers have a travel time that exceeds 30 minutes.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The METRO Gold Line is a planned bus rapid transitway in the engineering phase which could begin service as soon as 2024. The corridor would link St. Paul to Woodbury along interstate 94. This improvement may spur additional new development in Woodbury.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

While the data above is admittedly out of date and impacted by the recession, the concept that Woodbury hosts less jobs than workers in not a new one. The Job Less Worker figure reflects the high proportion of commuters who work outside Woodbury, and not necessarily an over-supply of labor that cannot find work. This is supported by the very low unemployment rate for those ages 25-65 of 2.45 percent. In general, workers are able to find work; but, the job locations may not be in Woodbury. Of the industry sectors noted above, only retail trade hosts more jobs than resident workers.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction’s Consolidated Plan.**

Woodbury staff interact with and in the past have long sat on the Board of the local Workforce Development Board. The main focus of the Board’s efforts is to coordinate workforce training initiatives through Washington County Workforce Centers. In particular, the Skill Match Initiative surveys businesses to identify skills that are in high demand by employers and works with training programs to help provide them. In this way the training programs are providing workers with the skills that employers need. Another organization that works to provide job training is Century College. Its curriculum is geared towards developing student skills and abilities to allow them to enter into or progress within the work force or transfer to a four years school. One Workforce Center funded program at the college provides short term training in basic administrative skills, such as computer word processing, to allow them to obtain an entry level job while also providing a platform to continue their education.

Washington County CDA which is based in Woodbury, administers the federally funded Family Self Sufficiency program. This program works with families to develop personalized financial goals around the idea of self-sufficiency and then develop a plan to help achieve them. WCCDA staff assists in the process by helping to connect families with available resources.
This Plan supports these job training and Family Self-Sufficiency programs by preserving and promoting the new development of affordable workforce housing. A stable and affordable housing situation can greatly facilitate educational attainment. In addition, it is also needed so that newly employed residents are able to remain in the community.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

No. However, the City adopted its 2018 Economic Development Strategic Plan March 14, 2018 and it is expected to have a length of three to four years.

**Discussion**

The low unemployment rate, relatively diverse job base, and high educational attainment rate all indicate a strong and healthy economy for Woodbury.

Woodbury’s close proximity to the interstate system has proven highly desirable for those seeking a suburban setting that is accessible to urban core job centers and amenities as well as the MSP International Airport. The city’s geographic setting also provides local businesses with an excellent means of distributing goods and services, as well as access to both customers and employees.

Woodbury has experienced significant growth since its incorporation in 1967. With roughly 75,000 residents, Woodbury is the eighth largest city in Minnesota. The City of Woodbury has been very successful in developing a strong commercial tax base and has a sound history of financial management including a AAA bond rating since 2009 while providing an exceptional level of municipal services to a growing population. Woodbury has an enviable array of restaurants, destination retail, and professional services which serve not only city residents and employees, but attract diners, consumers and clients from a broader regional market. However, there has been a long-term and consistent desire to increase the level of non-retail development in our community, to ensure that our residents have quality “places to work” and to balance, strengthen and diversify our property tax base. Additionally, a key component to Woodbury’s quality of life is our strong education system which is critical to the long-term success of the community.

Looking ahead, Woodbury’s economic development strategy will focus on two goals:

1. Promote Woodbury as a Community of Choice; and
2. Optimize Development and Redevelopment Opportunities.
MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

No.

There are different definitions of the term concentration. While not always synonymous, this plan refers to the HUD definition of disproportionate need, which exists when the members of any racial or ethnic group have a housing need that is 10% or higher than the total population. The four housing problems considered in this analysis include: lack of complete kitchen facilities, lack of complete plumbing facilities, overcrowding of more than one person per room, and housing cost burden greater than 30% of a households income.

According to the 2018 ACS, no households in Woodbury suffer from lack of complete kitchen facilities or lack of complete plumbing facilities. With regard to housing cost burden, this economic condition does not appear to be concentrated in a particular geographic area. Woodbury does review the LMISD data from HUD to determine which Census Tract Block Groups have the highest proportion of low- and moderate-income households. But, just because a household income is of a low- or moderate-income does not mean that the same households is cost-burdened.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Racial or ethnic minorities
For the purposes of this section, a concentration is defined as any census tract or sub-tract where 50 percent or more of the population is a racial or ethnic minority. There are no census tracts or sub-tracts in Woodbury that have a concentration of an ethic or minority population.

Low-income families
For the purposes of this section, a concentration of low income households is defined as any census tract or sub-tract where 50 percent or more of the households have income at or below 50% of HUD Area Median Family Income (HAMFI). Woodbury’s median household income according to the 2018 ACS was $103,547, which is one of the highest in the state. There are no census tracts or sub-tracts in Woodbury that have a concentration of low income households.

What are the characteristics of the market in these areas/neighborhoods?
NA

Are there any community assets in these areas/neighborhoods?
NA

Are there other strategic opportunities in any of these areas?
NA
MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

As part of the Mayor's Business Outreach Strategy, the City of Woodbury meets on an annual basis with Comcast and CenturyLink, the two main providers of cable and high-speed internet in the community. In Woodbury's neighborhoods, access is available via the private market. Comcast has shared with the City that they have programs available to assist low-income households gain access to affordable high speed internet.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

A healthy competition currently existing in Woodbury. Both Comcast and CenturyLink offer services and there are also a wide variety of cellular providers who offer service in the community.
MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction’s increased natural hazard risks associated with climate change.

The Natural Resources Chapter of Woodbury’s 2040 Comprehensive Plan is the best planning document to review this question at a macro-level. In addition to the Minnesota climate trends from the Department of Natural Resources (DNR) State Climatology Office, the National Oceanic and Atmospheric Administration (NOAA) reported in 2013 that precipitation amounts and storm intensities in the Great Lakes Region are trending upward. The City has responded to changes and analyzed the surface water system using these larger rain events to evaluate system capacity. Proper floodplain management and shoreland overlay zones also provide resilience for flooding and promote public health and safety for residents.

Woodbury is striving to provide resilience against other potential climate related impacts including extreme heat, diminished air quality, drought, and the spread of invasive species. The City is addressing these issues in a variety of ways including increasing tree canopy coverage; restoring native vegetation and controlling invasive species throughout the City; utilizing alternative energy sources such as geothermal and solar; incorporating energy efficiency best practices in buildings; requiring recycling and promoting composting; implementing water efficiency initiatives; and providing environmental education.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

In the event the temperatures continue to rise, there may be a greater need for residents to use air conditioning, fans and other cooling devices. If low- and moderate-income households are already experiencing constraints on their budgets, this may lead to economic challenges. Luckily for the City, Woodbury is within the service area of the Community Action Partnership of Ramsey and Washington Counties (CAPRW). CAPRW administers energy assistance programs and will be able to assist income-eligible households.
SP-05 Overview

Strategic Plan

Woodbury will allocate and invest the limited resources of the CDBG and HOME programs throughout the community whenever possible rather than identify one particular neighborhood or area on which to focus these resources. This flexibility allows Woodbury to address areas of need throughout the city as long as the project meets a priority need, is eligible under either the CDBG or HOME programs, funding is available and other resources have been identified.

Through the research and public process prior to the adoption of this Plan, the city identified that affordable housing needs have a high priority. Public facility projects in the City's parks system also have a high priority, with the caveat that these projects can only be funded when they are consistent with HUD's LMA process which illustrates how park projects in areas with higher concentrations of low- and moderate-income households meet the CDBG national objective of assisting low- and moderate-income households. All projects and/or programs that receive a “high” ranking must also be economically feasible to be eligible for HUD funding via CDBG and/or HOME. Investment of CDBG funds into park and public facility improvements will not limit the ability of the City to invest in affordable housing; but rather further improve the environmental justice for some of the medium- and high-density residential stock that abuts many of the community’s park and recreation facilities.
SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 14 - Geographic Priority Areas

<table>
<thead>
<tr>
<th>#</th>
<th>Area Name:</th>
<th>City of Woodbury</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Area Type:</td>
<td>Municipality</td>
</tr>
<tr>
<td></td>
<td>Other Target Area Description:</td>
<td>Municipality</td>
</tr>
<tr>
<td></td>
<td>HUD Approval Date:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>% of Low/ Mod:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Revital Type:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other Revital Description:</td>
<td></td>
</tr>
</tbody>
</table>

|   | Identify the neighborhood boundaries for this target area. |
|   | Include specific housing and commercial characteristics of this target area. |
|   | How did your consultation and citizen participation process help you to identify this neighborhood as a target area? |
|   | Identify the needs in this target area. |
|   | What are the opportunities for improvement in this target area? |
|   | Are there barriers to improvement in this target area? |

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

Geographic Area

The City of Woodbury is located to the east of St. Paul and with a 2020 population of roughly 75,000. As such, Woodbury is the eighth most populous city in Minnesota. The City is also home to a dynamic mixture of businesses and has increasingly become a health care destination. The city is roughly a six mile by six mile square of which about three-quarters are developed and the remaining undeveloped area consists mostly of agricultural and open space.

Much of this agricultural and open space will develop prior to 2040 or 2050 when the City should reach its population capacity.

General Allocation Priorities

Woodbury will allocate and invest the limited resources of the CDBG and HOME program throughout the city whenever possible. No geographic targeting is needed within Woodbury because the funds are used primarily for affordable housing projects that include a significant amount of context-specific land use and planning review. As long as a project meets a priority need, it would then be eligible under either the CDBG and HOME program, as long as funding is available and other programmatic requirements are met.

The City of Woodbury, often in partnership with its municipal HRA is actively attempting to facilitate the development of additional new construction affordable housing units. Unfortunately in Woodbury, as with the rest of the State of Minnesota, the private-activity bonds needed to leverage the four percent low income housing tax credit are over-subscribed
and the financial realities of developing affordable housing prove the main obstacle to developing additional new affordable housing. This plan rejects the notion that local land-use planning, zoning, or NIMBYism are hindering the development of new affordable housing. In addition to housing projects, there are a number of potential park and public facility rehabilitation projects that could occur in LMA areas in the community. Specifically, because none of Woodbury’s Census tract block groups include a 50 percent or larger proportion of low- and moderate-income households, Woodbury is considered to be an “exception grantee”. Rather than list the specific census tract block groups where CDBG can be invested in LMA areas, this Plan notes that the City of Woodbury follows the guidance in CPD Notice 19-02 that defines how and when the LMA tool can be used. It is expected that within the 2020-2024 Consolidated Plan, the LMSID data from HUD will likely be modified/updated and Woodbury will adjust to those modifications accordingly.
### Priority Needs

#### Table 15 – Priority Needs Summary

<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Low-income small-related rental and ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority Level</td>
<td>High</td>
</tr>
<tr>
<td>Population</td>
<td>Low Families with Children</td>
</tr>
<tr>
<td>Geographic Areas Affected</td>
<td>Municipality</td>
</tr>
<tr>
<td>Associated Goals</td>
<td>Affordable Homeownership</td>
</tr>
<tr>
<td>Description</td>
<td>Low-income small-related rental and ownership households.</td>
</tr>
<tr>
<td>Basis for Relative Priority</td>
<td>These needs were identified as high priority needs by the City Council via Council Resolution on January 22, 2020. These priorities affirm the City’s approach to use CDBG and HOME funds to develop new and/or redevelop existing affordable housing to households earning between 30% and 80% of AMI. The citizen engagement process connected to these meeting and input that was received is summarized above in Section PR-15.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Low-income large-related rental and ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority Level</td>
<td>High</td>
</tr>
<tr>
<td>Population</td>
<td>Low Large Families</td>
</tr>
<tr>
<td>Geographic Areas Affected</td>
<td>Municipality</td>
</tr>
<tr>
<td>Associated Goals</td>
<td>Affordable Homeownership</td>
</tr>
<tr>
<td>Description</td>
<td>Low-income large-related rental and ownership households.</td>
</tr>
<tr>
<td>Basis for Relative Priority</td>
<td>These needs were identified as high priority needs by the City Council via Council Resolution on January 22, 2020. These priorities affirm the City’s approach to use CDBG and HOME funds to develop new and/or redevelop existing affordable housing to households earning between 30% and 80% of AMI. The citizen engagement process connected to these meeting and input that was received is summarized above in Section PR-15.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Priority Need Name</th>
<th>Moderate-income small-related rental and ownership</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority Level</td>
<td>High</td>
</tr>
<tr>
<td>Population</td>
<td>Moderate Families with Children</td>
</tr>
<tr>
<td>Geographic Areas Affected</td>
<td>Municipality</td>
</tr>
<tr>
<td>Associated Goals</td>
<td>Moderate</td>
</tr>
<tr>
<td>Description</td>
<td>Moderate-income small-related rental and ownership households.</td>
</tr>
<tr>
<td>Basis for Relative Priority</td>
<td>These needs were identified as high priority needs by the City Council via Council Resolution on January 22, 2020. These priorities affirm the City’s approach to use CDBG and HOME funds to develop new and/or redevelop existing affordable housing to households earning between 30% and 80% of AMI. The citizen engagement process connected to these meeting and input that was received is summarized above in Section PR-15.</td>
</tr>
<tr>
<td>Priority Need Name</td>
<td>Description</td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>4</td>
<td>Moderate-income large-related rental and ownership households</td>
</tr>
<tr>
<td>5</td>
<td>Park and Public Facility Improvements</td>
</tr>
</tbody>
</table>
### Basis for Relative Priority

This need was identified as a high priority by the City Council via Council Resolution on January 22, 2020. Improvements to parks and public facilities in LMA exception areas will provide appropriate infrastructure and amenities to low- and moderate-income households. Investments in parks and public facilities near affordable housing helps the City to meet the requirements of the environmental justice executive order.

### Priority Need Name
CDBG Program Administration

### Priority Level
High

### Population
Other

### Geographic Areas Affected
Municipality

### Associated Goals
Affordable Homeownership
Affordable Rental
City of Woodbury CDBG Program Administration

### Description
CDBG Program Administration

### Basis for Relative Priority
City staff received a recommendation that CDBG program administration be added as a priority and as a goal so that the activity could be funded and the CDBG program be appropriately managed throughout the 5-year course of the Consolidated Plan.

### Priority Need Name
Combatting and Preventing COVID-19

### Priority Level
High

### Population
All income levels
Large Families
Families with Children
Elderly
Public Housing Residents
All potential homeless classifications except for rural homeless
Non-homeless special needs populations

### Geographic Areas Affected
City of Woodbury

### Associated Goals
Use of CDBG-CV

### Description
As part of the CARES Act, a separate CDBG-CV revenue stream was created which will lead to Woodbury receiving a CDBG-CV grant from HUD in the amount of $140,672. While initially attached to the 2020 AAP, at the recommendation of HUD, to accommodate the structure of IDIS, Woodbury is rather planning for CDBG-CV via an amendment to its 2019 AAP. Given the pandemic nature of COVID-19, these CDBG-CV dollars have the potential to positively impact any and all residents of the City.

### Basis for Relative Priority
Given that CDBG-CV is its own source of revenue that must be spent to prepare for and prevent COVID-19, its use is a high priority and the CDBG-CV is separate from the other projects and activities discussed by this plan.
Narrative

The following needs were identified as high priority needs by the City Council per Council Resolution on January 22, 2020. These priorities affirm the City’s approach to use CDBG and HOME funds to develop new and/or redevelop existing affordable housing to households earning between 30% and 80% of AMI. An additional high priority not bulleted below is program administration. These needs were identified based on previous consolidated plan and annual action plan projects as well as a community meeting held at Woodbury City Hall on January 13, 2020.

30% to 50% of AMI
- Low-income small-related rental households
- Low-income large-related rental households
- Low-income small-related ownership households
- Low-income large-related ownership households

50% to 80% of AMI
- Moderate-income small-related rental households
- Moderate-income large-related rental households
- Moderate-income small-related ownership households
- Moderate-income large-related ownership households

Park and public facility improvements

The eight needs listed above as high priorities are the only high priority needs. Woodbury recognizes that there are significant needs in the community related to homelessness, households who are at risk of becoming homeless, special needs households, and non-housing community development needs. The majority of these needs, however, are coordinated through Washington County Community Services and the Washington County CDA. As such, given the extremely limited amount of available funds, these needs are considered to be low priorities. In summary, the Needs Assessment and Market Analysis sections seen above highlight Woodbury’s clear and detailed need for investment in affordable housing.

Please note that CDBG Program Administration was added as a high need given that it will be an activity in IDIS in each program year governed by this 2020-2024 Consolidated Plan.

The need connected to Combatting and Preventing COVID-19 was identified by the Woodbury City Council as a high priority level on May 13, 2020.
**Influence of Market Conditions**

<table>
<thead>
<tr>
<th>Affordable Housing Type</th>
<th>Market Characteristics that will influence the use of funds available for housing type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
<td>Severe cost burden among renter households in a market with modest rents is the greatest predictor of a successful TBRA program. Due to the high rents seen in Woodbury, a TBRA program would not adequately or efficiently reduce rental cost burdens.</td>
</tr>
<tr>
<td>TBRA for Non-Homeless Special Needs</td>
<td>A high level of cost burden among non-homeless special needs households and waiting lists at existing rental facilities are the best indicators of need for a targeted TBRA program. Woodbury households benefit from access to Washington County HRA rental assistance programs for special needs households.</td>
</tr>
<tr>
<td>New Unit Production</td>
<td>Low vacancy rates, high rents and high housing cost burdens demonstrate a need for additional affordable housing in Woodbury. As such new production of affordable housing units is a high priority for Woodbury’s investment of CDBG and HOME resources.</td>
</tr>
<tr>
<td>Rehabilitation</td>
<td>Older housing, prevalence of housing problems and high cost burdens demonstrate a need for CDBG- or HOME-funded rehabilitation programs. For this plan, this need is not a high priority but moving forward in time future Consolidated Plans will likely see this affordable housing type or project as a high priority.</td>
</tr>
<tr>
<td>Acquisition, including preservation</td>
<td>High occurrences of tax delinquent or foreclosed properties are strong indicators of need for acquisition of properties for redevelopment and/or preservation. These occurrences are not currently high in Woodbury; however, property transactions are always context-specific and strategic acquisition can be a very effective tool to help facilitate affordable housing development.</td>
</tr>
</tbody>
</table>

**Table 16 – Influence of Market Conditions**
SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

Woodbury expects to receive CDBG and HOME funds, available from HUD, during the five year period of this Consolidated Plan. These anticipated resource projections are made for FFY 2020 and the remaining four years of the Consolidated Plan. The projected future funding includes a slight increase each year based on recent funding history. Woodbury's growth rate tends to exceed that of the nation which leads to slight increases in funding. That said, however, the recommended budgets from White House for the past several years have suggested cuts to the program. As such, budgeting for CDBG and HOME beyond one year at a time is difficult. Woodbury receives CDBG directly but accesses HOME as a subrecipient member of the Dakota County HOME Consortium. As such, most tables in this plan are specific to CDBG rather than HOME.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Expected Amount Available Remainder of ConPlan</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Annual Allocation:</td>
<td>Program Income:</td>
</tr>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition, Planning, Economic Development, Housing, Public Improvements, Public Services</td>
<td>$239,093</td>
<td>$50,000</td>
</tr>
</tbody>
</table>

Program income is estimated from past years given amount of outstanding loans issued. Prior year resources is an estimate for reprogrammed funds and is subject to flux.

Table 17 - Anticipated Resources
Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

While these federal funds are limited in their amount, they do help to leverage local HRA funds as well as future project-based LIHTC, Metropolitan Council LCDA, and Minnesota Housing funds. These funds also help leverage future projects that help meet the required 25% match for HOME funds.

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

The City does not currently own land that can be used to address the needs identified in this plan.

Discussion

The City of Woodbury continues its commitment to using federal funds in a cost-effective and streamlined manner. One example of this commitment is the practice of issuing low-interest loans that both assist households in need and provide future program income thereby growing the pool of resources available to meet community needs.
SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

<table>
<thead>
<tr>
<th>Responsible Entity Type</th>
<th>Responsible Entity</th>
<th>Role</th>
<th>Geographic Area Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government</td>
<td>WOODBURY</td>
<td>Economic Development Ownership Planning neighborhood improvements public facilities</td>
<td>Jurisdiction</td>
</tr>
<tr>
<td>PHA</td>
<td>Washington County Housing and Redevelopment Authority</td>
<td>Ownership Public Housing Rental</td>
<td>Region</td>
</tr>
<tr>
<td></td>
<td>WASHINGTON COUNTY</td>
<td>Homelessness Non-homeless special needs public services</td>
<td>Region</td>
</tr>
</tbody>
</table>

Table 18 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Between the combined efforts of the City, Washington County and its CDA, the institutional delivery system functions effectively given the leverage and partnerships with local non-profit and faith-based communities.

There exists a gap in qualified Community Housing Development Organizations in Woodbury. Due to restructuring of the Two Rivers CLT, the organization no longer qualifies for CHDO status. Twin Cities Habitat for Humanity is also currently restructuring its CHDO operations and may no longer qualify as a CHDO in the future.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

<table>
<thead>
<tr>
<th>Homelessness Prevention Services</th>
<th>Available in the Community</th>
<th>Targeted to Homeless</th>
<th>Targeted to People with HIV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Counseling/Advocacy</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Legal Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mortgage Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rental Assistance</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Utilities Assistance</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Street Outreach Services

| Law Enforcement | X |
| Mobile Clinics  | X |
| Other Street Outreach Services | X | X |
Supportive Services

<table>
<thead>
<tr>
<th>Service</th>
<th>X</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Alcohol &amp; Drug Abuse</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Child Care</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Employment and Employment Training</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Healthcare</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HIV/AIDS</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Life Skills</td>
<td>X</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Mental Health Counseling</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other

Table 19 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The community’s strength of the service delivery system to homeless persons and special needs population is the result of strong collaboration between Washington County, homeless service providers, mainstream service providers, citizens and stakeholders. The Housing Collaborative facilitates the connections between providers to meet the needs of these populations. The collaborative meets on a regular basis with the purpose of sharing resources, building strong relationships among providers and looking at gaps in the system. When a gap is recognized, the collaborative strategize ways to address the need. An example of when this happened was when it was recognized Washington County had a growing homeless youth population. Members of the collaborative came together to address the need by applying for and receiving funding for outreach, case management and rental assistance dollars to serve youth.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The new Coordinated Access system has been developed to more accurately determine the level of need and directing homeless persons or persons at risk for homelessness to the appropriate services. Persons presenting as homeless will have an initial assessment to determine level of need; if diversion resources such as one time rental assistance, help connecting to alternative housing options or other financial help that can prevent or solve housing crisis will be used. People that are diverted will be connected to community resources such as employment services, legal assistance, and supportive services.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Woodbury will provide support and encourage CHDOs and other developers in the Twin Cities area to develop affordable housing in our community. Additionally, the position duties of the City's Community Development Coordinator have been redefined to include the role of community affairs liaison. Through this new endeavor, the City hopes to be more intentional in
learning about the non-profit and faith organizations that serve the community. This will help identify potential gaps in institutional structure and what, if any, steps the City will take to address such potential gaps.
### SP-45 Goals - 91.415, 91.215(a)(4)
#### Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Affordable Homeownership</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>City of Woodbury</td>
<td>CDBG Program Administration&lt;br&gt;Low-income large-related rental and ownership&lt;br&gt;Low-income small-related rental and ownership&lt;br&gt;Moderate-income large-related rental and ownership&lt;br&gt;Moderate-income small-related rental and ownership</td>
<td>CDBG: $531,500</td>
<td>Direct Financial Assistance to Homebuyers: 20 Households Assisted</td>
</tr>
<tr>
<td>2</td>
<td>Affordable Rental</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>City of Woodbury</td>
<td>CDBG Program Administration&lt;br&gt;Low-income large-related rental and ownership&lt;br&gt;Low-income small-related rental and ownership&lt;br&gt;Moderate-income large-related rental and ownership&lt;br&gt;Moderate-income small-related rental and ownership</td>
<td>CDBG: $270,000</td>
<td>Rental units constructed: 40 Household Housing Units</td>
</tr>
<tr>
<td>3</td>
<td>Park and Public Facility Improvements</td>
<td>2020</td>
<td>2024</td>
<td>Non-Housing Community Development</td>
<td>City of Woodbury</td>
<td>CDBG Program Administration&lt;br&gt;Low-income large-related rental and ownership&lt;br&gt;Low-income small-related rental and ownership&lt;br&gt;Moderate-income large-related rental and ownership&lt;br&gt;Moderate-income small-related rental and ownership</td>
<td>CDBG: $318,244</td>
<td>Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1320 Persons Assisted</td>
</tr>
<tr>
<td>4</td>
<td>Affordable Housing</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>City of Woodbury</td>
<td>CDBG Program Administration&lt;br&gt;Low-income large-related rental and ownership&lt;br&gt;Low-income small-related rental and ownership&lt;br&gt;Moderate-income large-related rental and ownership&lt;br&gt;Moderate-income small-related rental and ownership</td>
<td>CDBG: $146,878</td>
<td>Other: 75,000 residents</td>
</tr>
</tbody>
</table>

#### Table 20 – Goals Summary

### Goal Descriptions
Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The estimated number is 52 based on 40 rental units and 12 ownership units.

The fluctuating federal budget process makes it very difficult to project future resources that will be available. However, based on past performance, HOME resources should be available to fund about three loans per year using the first-time homeownership program. It is the anticipation that within the purview of this Consolidated Plan there will be an opportunity to fund one LIHTC project that will add about 40 units of affordable rental to the community’s housing stock. During the program year that the LIHTC project is funded, resources would likely be focused on that and not on the ownership programs. As such, the five-year plan anticipated four years of focus on ownership with one year of focus on rental.

These are very context-specific goals and should the opportunity arise to have more than one LIHTC project within the five years of this plan, resources would likely be reallocated through an amendment to the plan.

For purposes of clarity, this Consolidated Plan notes that additional CDBG as well as local resources will be available during the purview of the 2020-2024 Consolidated Plan to provide additional resources to additional income-qualified households.
SP-50 Public Housing Accessibility and Involvement – 91.215(c)

1. Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A.

2. Activities to Increase Resident Involvements

The Washington County CDA serves as the PHA for our community. The Washington County CDA has shared with Woodbury that resident involvement in policy and decision making is very important in Washington County. Each rental property has a resident council to plan social and philanthropic activities. There are two Resident Advisory Boards with representation by public housing residents and Housing Choice Voucher participants. The Resident Advisory Boards participate in policy and decision making related to those programs. The Resident Advisory Board also recommends a resident or participant to be involved at higher level policy making with a commissioner seat on the Washington County CDA Board.

3. Is the public housing agency designated as troubled under 24 CFR part 902?

No.

4. Plan to remove the ‘troubled’ designation

N/A.
1. Barriers to Affordable Housing

The largest barrier to affordable housing in Woodbury is the high cost of land and increasing cost of construction and infrastructure. These costs lead to expensive pro formas, which in turn limit the ability to add new units of affordable housing to the community. The other corresponding barrier is a lack of resources. As a sub-allocator, the Washington County CDA tends to have only enough nine percent credits to finance 45 units every other two years. On the four percent side, there is access to credit, but access to the needed private activity bonds are far over-subscribed. (As a financing source, the LIHTC program is the dominant revenue stream for production of new affordable housing in the country representing a shift from HUD to the Treasury Department in terms of resources for housing.)

2. Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Woodbury rejects the notion that its public policies lead to negative effects on affordable housing and residential development. A Guiding Principle of the 2040 Comprehensive Plan which serves as the primary planning document for the city states that “the City of Woodbury should encourage the development of a diversity of housing to accommodate people of all ages, income levels and family status. The City will identify areas for residential growth in a range of types, styles and affordability while maintaining high quality building standards and amenities.”

Beyond the realm of planning documents, Woodbury’s past performance in affordable housing also is worth noting. At the regional level in the Twin Cities, the Metropolitan Council assigns communities an allocation of affordable housing need and a subsequent Livable Communities affordable housing goal. For the period from 1996-2010, Woodbury met both its affordable ownership and affordable rental goal. Woodbury was one of only six cities in the seven-county area to meet these goals.

From an operational perspective moving forward, Woodbury updated its density policy on September 25, 2019 via Council Resolution 19-146 authorizing Council Directive CD-COMDEV-3.23. This density policy specifically provides the City Council with a tool to offer density bonuses to development projects when affordable housing or assisted living units are the focus of the development. Additionally, the City continues to use the power of its municipal HRA levy to finance affordable housing initiatives.

Separate from this HUD process, the City of Woodbury will be focusing on housing policy in 2020 in an effort to update its Housing Action Plan.
1. Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Providers in Washington County have developed outreach plans to special populations. From 2009 to present, the following outreach efforts were developed in Washington County:

- St. Croix Family Resource Center opened 2 youth drop-in centers, one in Stillwater and one in Cottage Grove in 2018 and 2019.
- StreetWorks has continued to provide youth outreach part-time through their CoC funded programs.
- Washington County expanded their PATH program to conduct outreach to homeless households with mental health issues and added additional staff dedicated to homeless outreach.
- St. Andrew’s Lutheran Church Community Resource Center operates as a drop-in center for homeless with onsite case management staff and resources.
- Washington County Community Services developed a Crisis Response Unit (CRU) with 10 social work staff who work closely with County Police and Sheriff's Departments and provide 24-hour availability to those in need of crisis services. Police and Sheriff Departments assist after-hours providers to place homeless families into hotels and make the proper referral to ensure rapid follow-up with the household the next morning.
- The CoC has adopted discharge policies for foster care, health care, mental health and corrections to ensure homeless households identified before leaving institutions are not discharged into homelessness.

2. Addressing the emergency and transitional housing needs of homeless persons

Washington County Community Services coordinates crisis assistance to families at risk for homelessness or currently homeless. Support services provide approximately 500 households annually with stabilizing assistance. The program provides direct financial resources including emergency shelter, rent deposit and rent payment assistance.

To address the needs of homeless persons and most efficiently utilize the resources, a Coordinated Access system has been developed. The system has been designed to meet the specific needs of Washington County with coordination with SMAC and the state to assure consistency across counties statewide. Washington County has three points of access for people experiencing homelessness: Canvas Health for youth, St. Andrew’s Community Resource Center for families, and Washington County Community Services for singles. An initial assessment is conducted to determine if the person or family can be diverted from homelessness with connections to resources. If it is determined housing is needed, a full assessment is conducted to determine the type of housing needed: shelter, rapid rehousing, transitional housing or permanent supportive housing.

Coordinated Access uses a tested assessment form to determine the level of need; assuring people are receiving the appropriate services to meet their housing needs. Once assessed, the homeless person will be referred to the following options:

- Prevention/Diversion: State and private funding provide a number of prevention and diversion programs for homeless households including direct financial assistance,
support services, housing search assistance and other options to resolve housing emergencies. Washington County’s Emergency Assistance Program and Washington County’s CDBG public services program also provide prevention/diversion services.

- **Shelter:**
  - Washington County hotel/motel shelter paid for by Washington County Community Services department (CDBG and Emergency Assistance)
  - St. Andrews Church hotel/motel shelter paid for by St. Andrews Church in Mahtomedi
  - Hope for the Journey Home Shelter (eight units for families)
  - Tubman Shelter for households experiencing domestic violence (located in Ramsey County but has designated beds for Washington County residents)

- **Rapid Rehousing (RRH):** Short term assistance to move people into permanent housing. Short term supportive services may be available to assist with stability and prevent people becoming homeless again.

- **Transitional Housing:** Washington County has a limited number of transitional housing units for families and singles who need more support and assistance than can be provided through a rapid rehousing model.

- **Permanent Supportive Housing:** Provides ongoing support financial and supportive services.

To address homelessness for individuals and families, federal, state and private funding will continue to be solicited to support the development of permanent and permanent supportive housing.

Additionally, within and specific to Woodbury, every March Woodbury Lutheran Church participates in the St. Paul Area Council of Churches (SPACC) Project Home. Project Home serves as Ramsey County’s overflow family shelter coordinating congregations to provide emergency overnight shelter in their facilities. Each month, two different area churches, synagogues or schools host Project Home, providing a safe, clean space for homeless families. Participating congregations gather volunteers to help at a Project Home host site. Volunteers greet families as they arrive for the evening, play with children, assist with homework, serve snacks or stay overnight and serve breakfast. According to SPACC, most Project Home guests find housing within one month of their stay.

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

**Veterans**
Washington County has two main programs to serve veterans including 1) Washington County Community Services which includes the Veterans Service Office and Housing Unit and 2) Minnesota Assistance Council for Veterans. Washington County Community Services provides primary access to veterans for mainstream resources and veterans benefits. Emergency shelter through hotel/motel vouchers is also provided as needed.

Homeless or near homeless veterans are also referred to the Minnesota Assistance Council for Veterans (MACV) which serves homeless veterans with other needs. MACV is a statewide non-profit organization.
A profit organization which focuses on housing, employment, and legal assistance for veterans and their families. They have been operating within Washington County for 25 years, and have established strong partnerships and linkages within the community. MACV has a variety of programs and grants that support their mission, including grants from the Veterans Administration (VA) such as Supportive Services for Veteran Families (SSVF) that provides both Prevention and Rapid Re-housing of homeless veterans into Washington County communities. MACV also provides transitional housing options for homeless veterans, operating sites that provide scattered site and residential housing options, to include their first transitional home for women veterans. MACV’s Department of Labor grant, Homeless Veterans Reintegration Program (HVRP), assists homeless veterans into employment. MACV also coordinates the metro-wide homeless veteran annual StandDown event, which serves over 900 veterans within a two-day period. MACV leverages other State, Veteran Service Organization, and Foundation grants to provide direct assistance to homeless and at-risk veterans to insure housing stability.

MACV has a very close relationship with VA Hospital and Homeless Program in Minneapolis which covers Washington County, as well as with the Washington County Veteran Service Office. MACV works closely with the VA Homeless Program to fill gaps in services for veterans receiving HUD-VASH vouchers (such as security deposits, utility assistance, moving costs, etc.) and to connect homeless veterans to VA services. MACV maintains and cultivates a collaborative effort with the other homeless service providers in the community, and local government agencies, by serving on the CoC and FHPAP committees.

Unaccompanied Youth
The following homeless youth activities will be conducted in Washington County:
- Canvas Health will use Family Homeless Prevention and Assistance Program (FHPAP) funds to support staff that will conduct outreach and support services to youth. A Host Home program is in the process of being developed which will allow for additional youth housing.
- Salvation Army will use FHPAP funds to provide short term rental assistance to youth.
- Solid Ground will use FHPAP funds for two youth to receive Rapid Rehousing.

Families with children
- Washington County’s mainstream homeless services collaborate closely with non-homeless services to provide the resources needed for families to prevent homelessness or shorten the length of homelessness. They include:
  - Provide prevention funding through Family Homeless Prevention and Assistance, County Emergency Assistance, Federal Emergency Management Agency, Salvation Army funding, and faith-based programs, and private sources.
  - Prepare households with skills and resources to maintain housing stability upon exit, connect to employment service, benefits, lifeskills training, and other community supports systems.

Chronically homeless
The Housing Collaborative is the primary entity which oversees the response to chronic homelessness. The Collaborative has membership from non-profits, local government, homeless advocate organizations, formerly homeless persons and citizens. The Collaborative is a member of SMAC and provides the local voice to the planning and implementation of services, discusses the needs and strategies for chronically homeless citizens, and oversees use of Continuum of Care funding.
4. Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

With regard to shortening the period of homelessness for all households, in order to evaluate success of programs in moving persons from transitional and emergency shelter to permanent housing, we need to have a data system that reliably collects and reports data. The Housing Collaborative currently measures how long it takes from a household’s FHPAP “date of contact” to the date the household obtains housing. Information is also pulled from the Homeless Management Information System (HMIS) able to track the number of days in emergency shelter. This data is shared regularly at Housing Collaborative meetings so providers can evaluate their own programs and make improvements.
Actions to address LBP hazards and increase access to housing without LBP hazards

Woodbury has not used CDBG or HOME to finance home rehabilitation efforts that could lead to the disturbance of LBP which is a typical trigger for the toxic material. However, in the event that CDBG or HOME funds were to be used for purchases of existing housing units constructed prior to 1978, the units will be evaluated for lead. Mitigation efforts will be utilized as needed. These actions will be pursued to evaluate and reduce lead-based paint hazards in Woodbury’s housing stock.

How are the actions listed above integrated into housing policies and procedures?

The Minnesota Department of Health provides an annual "Blood Lead Surveillance Report". This 2018 report, as published in 2019, does not identify specific risks or problems in Woodbury.

The State of Minnesota also offers a defined protocol for blood level testing. Minnesota Statutes (MS 144.9504) and the MDH Childhood Lead Case Management Guidelines for Minnesota dictate responses to different blood lead levels. The City of Woodbury follows these state guidelines and will continue to do so.

In 2008, the Minnesota Department of Health reported that 939 of the 96,000 children (less than 6 years of age) receiving blood tests had elevated levels of lead in their blood (10ug/dL). This is slightly less than one percent of all children tested. In the same year of the 3,175 children (less than 6 years of age) tested in Washington County, only eleven had levels between 10ug/dL and 14.9ug/dL. So in Washington County, roughly 0.3 percent of children tested had elevated blood levels that would warrant action. This rate is significantly less than the State average of about one percent. Data is lacking at the municipal level and Woodbury accepts that lead exposure data for the County in this case is likely similar to the exposure risks in Woodbury.

Due to the lack of data, the best way to estimate the number of housing units with possible lead based risks is to estimate the number of housing units constructed in or prior to 1978. Approximately 2,271 housing units were built in or prior to 1978. This represents roughly nine percent of Woodbury’s housing stock. Of these 2,271 identified buildings that were constructed when lead-based paint was commercially available, some may have already been made lead-safe, but these numbers are not available.

Table DP-03 of the 2017 ACS data estimates that 3.6 percent of individuals in Woodbury experience poverty. When it comes to lead-based paint, it would be statistically inappropriate to assume that a correlation exists between households living in poverty and households living in structures that were constructed in or prior to 1978. As a result, although the City of Woodbury acknowledges that a lack of data exists, this Consolidated Plan does not identify exposure to lead-based paint hazards as a significant concern either to the LMI households in Woodbury or to the population as a whole.

Using the poverty rate as measure of LMI households, the poverty rate of 3.6 percent can be applied to the number of housing units built in or prior to 1978 to estimate the number of LMI households living in housing units with potential exposure to lead-based paint hazards. Using
this method, there may be less than 90 LMI households living in housing units with a possible lead-based hazard, although, again, this number is not statistically reliable.
SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The City of Woodbury does not have a specific program or policy for reducing poverty-level families. However, through its Critical Success Factor performance measurement system, the City does evaluate the economic health of the community. Woodbury desires to continue adding jobs to the community. Not only will this help eliminate any potential barriers to employment, but as Woodbury households are able to work in the community in which they live, the has the potential to reduce commute-driven transportation costs thereby helping households budgets.

Woodbury is supportive of the proposed METRO Gold Line bus rapid transit system that will help link residents with employment opportunities thus alleviating the effects of poverty.

Within the public services arena, Woodbury focuses on maximizing the available resources for support services for its customers. This is achieved by maintaining connections and partnerships with Washington County as well as with local non-profits and service organizations. Some of these connections are Valley Outreach (faith based services and food shelf), Second Harvest, Salvation Army, Goodwill Industries, Family Means (financial and mental health counseling), Food Shelves, Metro Transit and Transit Link, Community Thread (volunteer services), local churches, the Community Action Partnership of Ramsey and Washington Counties and East Suburban Resources (services for persons with disabilities) to name a few.

One of the key elements of this has been education of both staff and customers as to what is available and how customers can get access to these available resources. In addition, Washington County staff is actively involved in the Housing Collaborative (which manages the Continuum of Care process) and Family Homelessness Prevention and Assistance Program (FHPAP) Advisory Committee. Many of the aforementioned agencies, and interested citizens, participate on these committees. Both committees are focused on maintaining an effective homeless response system which includes prevention services and transitional and permanent housing options. The Housing Coordinator staff, which provides the CDBG funded public services, facilitated the strong partnerships that continue to exist between members of these two groups. Washington County also supports and works closely with the WCCDA which promotes community and economic development, and provides and maintains affordable, decent and safe housing opportunities in Washington County. Clients of Washington County often rely on WCCDA programs such as rent payment assistance and mortgage foreclosure assistance.

Also specific to Woodbury, the Parks and Recreation Department has had a longstanding policy (CDPKREC-7.2) offering reduced fees to households earning less than 80 percent of AMI as determined by HUD. Woodbury has a long history of guiding land for medium- and high-density development proximate to our natural resources. While this does not combat poverty directly, from an environmental justice perspective, it provides low- and moderate-income households with direct access to park and recreation programming opportunities.
How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

In the event that Woodbury households have more secure economic conditions due to positive employment outcomes, the poverty rate in Woodbury may decline. Given the cyclical nature of the economy, however, Woodbury recognizes that investments in housing are needed in addition to new jobs to create a balanced approach towards combatting poverty. The ability for households to lock-in stable rents or mortgages that are affordable to them will help provide overall stability in their budgets and will likely help low- and/or moderate-income households experience greater safety within their budgets. Beyond investments in new construction of housing, rental assistance programs, public housing efforts and anti-homelessness efforts as coordinated by the county remain critical.
Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Woodbury will monitor its recipients of HUD funds closely. This monitoring process does not stop upon the execution of the written agreement or the entry of data into IDIS. Long-term commitments will be entered into regarding income verification, compliance with Section 3, labor standards, record keeping, financial management and more.

Woodbury is responsible for ensuring that the management and use of federal funds are in accordance with regulatory requirements. For this purpose, the Woodbury City Council has adopted a wide range of policies regarding HUD funds in the shape of Council Directives.

In addition to Woodbury’s city-specific monitoring efforts, there are a wide variety of quarterly, semi-annual and annual reports that Woodbury submits to HUD regarding various components of the program. These standardized reports culminate with the annual Consolidated Annual Performance and Evaluation Report (CAPER) that the City submits to HUD prior to September 30 of every year. HUD has approved each CAPER submitted by the City.

HUD investments are monitored with the level of monitoring ranging from desk reviews to onsite visits and follow-ups.

Desk Reviews focus on the following:
- The project budget should cover the length of the contract and identify the use of all funds by line item and eligible expense.
- Proof of compliance with national objectives with special emphasis on income verification.
- Documentation of all expenses as they relate to the use of HUD funds is required. This documentation is submitted along with the all payment requests. With regard to direct homebuyer assistance funded through loans programs, a thorough review of mortgages, notes, riders and closing disclosures is a critical and immediate monitoring step.

The above list is not all-inclusive; however, it provides examples of the types of information that staff is responsible for monitoring on a regular basis during the annual agreement period.

Tracking System. City staff monitors the HRA Loan Administrator off-site on an at-least annual basis to ensure that they are following the HUD rules accordingly. In addition to this annual monitoring, loan specific documents are monitored by city staff both prior to and following the loan closing and city staff monitors HUD-funded investments closely to ensure that the long-term affordability requirements are being met. These loans are tracked to ensure affordability periods are met and other long-term compliance requirements are satisfied.

Monitoring Approach. Woodbury views monitoring as an on-going process that involves continuous communication and evaluation of projects and investments. This process involves teleconferences, written communication, analysis of reports, technical assistance, and periodic meetings. Woodbury utilizes this all-encompassing approach to be fully informed concerning issues of compliance with federal regulations and evaluate if technical assistance is needed by the agency and its administration to execute its objectives efficiently.
Woodbury conducts on-site monitoring visits of those agencies that have been funded with HUD funds. Visits to sites are conducted by city staff although such visits can be in coordination with third-party groups.

Third Party Roles. As a sub-recipient member of the Dakota County HOME Consortium, Woodbury’s HOME program may be monitored by the Dakota County CDA at their discretion. Beginning in PY20, Woodbury will contract with Affordable Housing Connections to monitor HOME-funded rental projects, pending completion of procurement.
Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

Woodbury expects to receive CDBG and HOME funds, available from HUD, during the five year period of this Consolidated Plan. These anticipated resource projections are made for FFY 2020 and the remaining four years of the Consolidated Plan. The projected future funding includes a slight increase each year based on recent funding history. Woodbury's growth rate tends to exceed that of the nation which leads to slight increases in funding. That said, however, the recommended budgets from White House for the past several years have suggested cuts to the program. As such, budgeting for CDBG and HOME beyond one year at a time is difficult. Woodbury receives CDBG directly but accesses HOME as a subrecipient member of the Dakota County HOME Consortium. As such, most tables in this plan are specific to CDBG rather than HOME.

Anticipated Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Source of Funds</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 1</th>
<th>Narrative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CDBG</td>
<td>public - federal</td>
<td>Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services</td>
<td>Annual Allocation: $239,093, Program Income: $50,000, Prior Year Resources: $17,493, Total: $306,586</td>
<td>Program income is estimated from past years given amount of outstanding loans issued. Prior year resources is an estimate for reprogrammed funds and is subject to flux.</td>
</tr>
</tbody>
</table>

Table 21 - Expected Resources – Priority Table

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

While these federal funds are limited in their amount, they do help to leverage local HRA funds as well as future project-based LIHTC, Metropolitan Council LCDA, and Minnesota Housing funds. These funds also help leverage future projects that help meet the required 25% match for HOME funds.

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

The City does not currently own land that can be used to address the needs identified in this plan.

**Discussion**

The City of Woodbury continues its commitment to using federal funds in a cost-effective and streamlined manner. One example of this commitment is the practice of issuing low-interest loans that both assist households in need and provide future program income thereby growing the pool of resources available to meet community needs.
Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

<table>
<thead>
<tr>
<th>Sort Order</th>
<th>Goal Name</th>
<th>Start Year</th>
<th>End Year</th>
<th>Category</th>
<th>Geographic Area</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Goal Outcome Indicator</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Affordable Homeownership</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>City of Woodbury</td>
<td>Low-income large-related rental and ownership Low-income small-related rental...</td>
<td>CDBG: $68,000</td>
<td>Direct Financial Assistance to Homebuyers: 3 Households Assisted</td>
</tr>
<tr>
<td>2</td>
<td>Park and Public Facility Improvements</td>
<td>2020</td>
<td>2024</td>
<td>Non-Housing Community Development</td>
<td>City of Woodbury</td>
<td>Park and Public Facility Improvements</td>
<td>CDBG: $204,300</td>
<td>Public Facility or Infrastructure Activities Other than Low/Moderate Income Housing Benefit: 1395 Persons Assisted</td>
</tr>
<tr>
<td>3</td>
<td>City of Woodbury CDBG Program Administration</td>
<td>2020</td>
<td>2024</td>
<td>Affordable Housing</td>
<td>City of Woodbury</td>
<td>CDBG Program Administration</td>
<td>CDBG: $34,286</td>
<td>Other: 75,000 Other</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Non-Housing Community Development</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Program administration</td>
<td></td>
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</tr>
</tbody>
</table>

Table 22 – Goals Summary

Goal Descriptions

1. **Goal Name**: Affordable Homeownership  
   **Goal Description**: Woodbury expects to fund three loans using CDBG and three loans using HOME via the First-Time Homeownership Program. Additional loans will be funded by local resources. Dollar amounts are based on $25,000 loans with a 6.3 percent administrative fee. Actual dollar amounts of the loans may fluctuate and the administrative fee is subject to future contract negotiations with the Loan Administrator. Specific to this Annual Action Plan, there is $68,000 of CDBG identified for this project with additional resources in the shape of HOME and local dollars.

2. **Goal Name**: Park and Public Facility Improvements  
   **Goal Description**: The Menomini Park activity will include the replacement of aging play equipment, replacement of the adjacent basketball court, and replacements/updates to various table, bench, trail and other ancillary components of the park.
<table>
<thead>
<tr>
<th>3</th>
<th><strong>Goal Name</strong></th>
<th>City of Woodbury CDBG Program Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Goal Description</strong></td>
<td>Woodbury will use CDBG administrative funds for uses such as but not limited to oversight, program audit, training, affirmatively furthering fair housing, small area studies, affordable housing research, coordination and monitoring of the program and coordination and oversight of HOME expenditures. PY20 may see CDBG administrative expenses invested in the regional analysis of impediments to fair housing choice process which is a required process that occurs every five years. Not more than the sum of twenty percent of the annual CDBG grant and twenty percent of program income earned during the year may be spent on program administration.</td>
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</tbody>
</table>
AP-35 Projects - 91.420, 91.220(d)

Introduction

Woodbury has selected three projects to receive CDBG funds as part of its 2020 Annual Action Plan using program year 2020 dollars, program income and unexpended funds from previous program years. The three projects include $204,300 for public facilities project in Menomini Park, $68,000 to supplement the Woodbury HRA levy as a funding source of the First-Time Homeownership Program and $34,286 for program administration. A portion of the CDBG program administration funds will be used to administer the HOME program.

HOME funds are governed by the Dakota County Annual Action Plan. But, for purposes of reference, Woodbury anticipates expending $94,302 in HOME to supplement the Woodbury HRA levy as a funding source of the First-Time Homeownership Program, $5,000 for monitoring of HOME-funded rental projects in Woodbury, and a $2,142 fee to the Dakota County CDA.

In the event that 1) unanticipated program income is receipted during the program year and 2) applications for loans are received that exceed the budgeted amount, then the unanticipated program income may be used in PY20 to fund said loan applications. This shall apply to both CDBG and HOME.

The federal CARES Act allocated $140,672 of CDBG-CV to the City of Woodbury. These funds were originally planned for within the parameters of the 2020-2024 Consolidated Plan and its 2020 AAP. Subsequent to the May 13, 2020 City Council action to adopt the 2020-2024 Consolidated Plan and its 2020 AAP, HUD has requested that the City plan for CDBG-CV as part of the 2019 AAP instead.

<table>
<thead>
<tr>
<th>#</th>
<th>Project Name</th>
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<tbody>
<tr>
<td>1</td>
<td>PY20 HRA Loans--CDBG--Woodbury</td>
</tr>
<tr>
<td>2</td>
<td>PY20 CDBG Admin--Woodbury</td>
</tr>
<tr>
<td>3</td>
<td>PY20 CDBG--Menomini Park</td>
</tr>
</tbody>
</table>

Table 23 – Project Information

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

As noted in Section MA-05 and elsewhere in the 2020-2024 Consolidated Plan, the significant number of households in Woodbury with cost burden indicates that the affordability of the current housing inventory in Woodbury may not be sufficient to meet the needs of all Woodbury households and that there is a need for more affordable housing. Current low vacancy rates and high projected future demand for more rental units means that rents will likely rise in the future making housing more unaffordable for low income households. Strong future demand for high value for-sale housing may also push already high home values upwards making homeownership opportunities more unaffordable as well.

Woodbury will continue to carry out the CDBG and HOME programs to ensure the greatest benefit to its stakeholders. Through the completion of the Needs Assessment and the Market Analysis sections of the Consolidated Plan Woodbury staff was able to identify strategies and
projects to meet the needs and market. Through the public consultation process, Woodbury identified affordable housing as the principal need that will receive funding throughout this period and serve as the basis for the objectives developed in the Consolidated Plan.
### AP-38 Project Summary
#### Project Summary Information

<table>
<thead>
<tr>
<th></th>
<th>Project Name</th>
<th>Target Area</th>
<th>Goals Supported</th>
<th>Needs Addressed</th>
<th>Funding</th>
<th>Description</th>
<th>Target Date</th>
<th>Estimate the number and type of families that will benefit from the proposed activities</th>
<th>Location Description</th>
<th>Planned Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>PY20 HRA Loans--CDBG--Woodbury</td>
<td>City of Woodbury</td>
<td>Affordable Homeownership</td>
<td>Low-income small-related rental and ownership</td>
<td>CDBG: $68,000</td>
<td>CDBG is used a funding source to assist income-qualified buyers with the purchase of their first home.</td>
<td>6/30/2021</td>
<td>CDBG funds will likely be available to assist three income-qualified households in PY20.</td>
<td>N/A. The loan program is not neighborhood or area specific.</td>
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<td>Low-income large-related rental and ownership</td>
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<td>Moderate-income small-related rental and ownership</td>
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<td>Moderate-income large-related rental and ownership</td>
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<td>2</td>
<td>PY20 CDBG Admin--Woodbury</td>
<td>City of Woodbury</td>
<td>Affordable Homeownership</td>
<td>CDBG Program Administration</td>
<td>CDBG: $34,286</td>
<td>Woodbury will use CDBG administrative funds for uses such as but not limited to oversight, program audit, training, affirmatively furthering fair housing, small area studies, affordable housing research, coordination and monitoring of the program and coordination and oversight of HOME expenditures. PY20 may see CDBG administrative expenses invested in the regional analysis of impediments to fair housing choice process which is a required process that occurs every five years. Not more than the sum of twenty percent of the annual CDBG grant and twenty percent of program income earned during the year may be spent on program administration.</td>
<td>6/30/2021</td>
<td>CDBG is a program that benefits the entire community of roughly 75,000 residents. The most directly impacted residents will be those who use Menomini Park as well as those who benefit from Woodbury's affordable housing programs.</td>
<td>N/A.</td>
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<tr>
<td>3</td>
<td>PY20 CDBG--Menomini Park</td>
<td></td>
<td>Park and Public Facility Improvements</td>
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<tr>
<td><strong>Needs Addressed</strong></td>
<td>Park and Public Facility Improvements</td>
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<tr>
<td><strong>Funding</strong></td>
<td>CDBG: $204,300</td>
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<tr>
<td><strong>Description</strong></td>
<td>CDBG funds will be used to reinvest in Menomini Park. This LMA activity will demolish and replace an existing playground and basketball court along with ancillary repairs/replacements of park tables/benches, trail, landscaping and the correction of damage caused during construction.</td>
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<td><strong>Target Date</strong></td>
<td>November 30, 2021</td>
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<tr>
<td><strong>Estimate the number and type of families that will benefit from the proposed activities</strong></td>
<td>1,395 individuals are estimated based on LMISD data from HUD.</td>
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<tr>
<td><strong>Location Description</strong></td>
<td>Menomini Park is located on the west side of Battle Creek Lake. The actual improvements will be made on an area centered on roughly 100 feet to the east of the rear lot line of 307 Sherrie Lane.</td>
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<tr>
<td><strong>Planned Activities</strong></td>
<td>See above.</td>
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</tbody>
</table>
AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Funds may be directed anywhere within the boundaries of the City of Woodbury, MN. In various sections of the 2020-2024 Consolidated Plan and its 2020 Annual Action, including both sections AP-25 and AP-35, references are made to CDBG program administration serving 75,000 residents in the "other" category. Program administration is deemed to serve the entire community of 75,000 as opposed to one neighborhood or another. As Woodbury’s populations grows, the number of residents who benefit from the funding will grow as well.

Geographic Distribution

<table>
<thead>
<tr>
<th>Target Area</th>
<th>Percentage of Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Woodbury</td>
<td>100</td>
</tr>
</tbody>
</table>

Table 24 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

NA.

Discussion

Woodbury invests its funds in all neighborhoods of the City and does not restrict its operations on a geographic basis. Specific to this 2020 Annual Action Plan, the Menomini Park activity is an LMA-eligible activity that is specific to a specific census tract block group. Separately, the loan program does not have a geographic limitation.
Affordable Housing

AP-55 Affordable Housing – 91.220(g)

1. Introduction

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households to be Supported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless</td>
</tr>
<tr>
<td>Non-Homeless</td>
</tr>
<tr>
<td>Special-Needs</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 25 - One Year Goals for Affordable Housing by Support Requirement

<table>
<thead>
<tr>
<th>One Year Goals for the Number of Households Supported Through</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rental Assistance</td>
</tr>
<tr>
<td>The Production of New Units</td>
</tr>
<tr>
<td>Rehab of Existing Units</td>
</tr>
<tr>
<td>Acquisition of Existing Units</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Table 26 - One Year Goals for Affordable Housing by Support Type

Discussion
Woodbury anticipates that its investment of $132,875 of CDBG and HOME will assist five income-qualified households from acquiring existing housing units via the Woodbury First-Time Homeownership Program. This amount includes five loan in the amount of $25,000 apiece plus a 6.3 percent administrative fee to NeighborWorks Home Partners, the Woodbury HRA’s Loan Administrator.
1. **Introduction**

The Washington County CDA (WCCDA) administers all of the public housing units in Washington County including the City of Woodbury. According to the WCCDA, of the 105 public housing units, 42 are located in Woodbury and are scattered site detached single family home or townhome units.

2. **Actions planned during the next year to address the needs to public housing**

The WCCDA utilizes a capital improvement plan to identify future maintenance and repair needs and cost estimates in order to most effectively program its replacement reserve schedule. In addition to this financial planning tool, the WCCDA is in the process of converting all 42 public housing units in Woodbury to a tenant-based rental assistance program. The Woodbury City Council endorsed this conversion plan via resolution at its September 25, 2019 Council Meeting.

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

The WCCDA has a number of avenues for public housing residents to become involved in the management of public housing units. One way is through Resident Councils. There a Resident Council that represents those in the WCCDA’s scattered site public units as well as those in its Housing Choice Voucher program. Each Resident Council elects a board that plans events and provides educational opportunities to enhance resident quality of life. Resident Council meetings are held on a regular monthly basis.

Another way for a resident to become involved is to participate on the Resident Advisory Board. This board is made up of each Resident Council elected board (Chair, Vice-Chair, and Secretary), in addition to the Resident Commissioner that serves on the WCCDA Board of Commissioners. The Resident Advisory Board provides strategic direction by reviewing and assisting in the development of the WCCDA’s short and long term housing plans.

The Resident Commissioner serves on the WCCDA Board of Commissioners and is another potential way for a resident to become involved in management. This board is made up of seven members and makes decisions regarding the WCCDA’s programs and funding. The Board actions are accountable to Washington County.

Homeownership is encouraged through the WCCDA’s Public Housing Family Self Sufficiency Program (FSS). FSS enables public housing residents to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so they can obtain skills necessary to achieve self-sufficiency. This would include encouragement to participate in homeownership. In 2019, the WCCDA has 22 participants in the FSS program.
4. If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A.

5. Discussion

The public housing units in Washington County are in good physical condition. The WCCDA provides on-going maintenance and capital improvement projects to ensure the safety and quality in public housing. WCCDA values its residents and encourages their participation and involvement in policy and decision making.

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

Introduction

Washington County’s Housing Collaborative acts as the local Continuum of Care committee for this part of the metropolitan region in partnership with the Suburban Metropolitan Area Continuum of Care (SMAC). Organizations within the Continuum provide a number of homeless services and resources. The prevention end of the Continuum is largely made up of Washington County’s Housing Unit and Emergency Assistance Unit, nonprofits and faith-based organizations.

1. Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Continuum of Care Committee (CoC) uses the following approaches to reduce the length of time homeless and end long term homelessness.

- Outreach: Street outreach, teams that have developed partnerships with police, mental health crisis teams, and school liaisons to help identify households who have become homeless as early as possible.
- Coordinated Assessment: Through this program, SMAC has improved mapping of resources and our ability to accurately refer people to the right models. Assessments will be conducted within 10-14 days of shelter entry, referrals and placement within 21 days.
- Prevention/Diversion: State and private funding provide a number of prevention and diversion programs for homeless households including direct financial assistance, support services, housing search assistance and other options to resolve housing emergencies. Washington County’s Emergency Assistance Program and Washington County’s CDBG public services program also provide prevention/diversion services.

To address homelessness for individuals and families, federal, state and private funding will continue to be solicited to support the development of permanent and permanent supportive housing. Being a member in the CoC helps transitional housing and emergency shelter providers connect with affordable housing providers throughout our region to ensure that people exiting move to permanent housing.
Addressing the emergency shelter and transitional housing needs of homeless persons

The WCCDA maximizes its CDBG public services cap for crisis assistance to families at risk for homelessness or currently homeless. Support services provide approximately 500 households annually with stabilizing assistance. The program provides direct financial resources including emergency shelter, rent deposit and rent payment assistance.

To address the needs of homeless persons and most efficiently utilize the resources, a Coordinated Access system has been developed. The system has been designed to meet the specific needs of Washington County with coordination with SMAC and the state to assure consistency across counties state wide. Washington County has three points of access for people experiencing homelessness: Canvas Health for youth, St. Andrew’s Community Resource Center for families, and Washington County Community Services for singles. An initial assessment is conducted to determine if the person or family can be diverted from homelessness with connections to resources. If it is determined housing is needed, a full assessment is conducted to determine the type of housing needed; shelter, rapid rehousing, transitional housing or permanent supportive housing.

The SMAC region has several shelter options if emergency shelter is needed. In Washington County, the shelter options include: Washington County hotel/motel shelter paid for by Washington County Community Services department (CDBG and Emergency Assistance), St. Andrews Church hotel/motel shelter paid for by St. Andrews Church in Mahtomedi, Hope for the Journey Home Shelter (eight units for families), and Tubman Shelter for households experiencing domestic violence (located in Ramsey County but has designated beds for Washington County residents).

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

SMAC will provide Rapid Rehousing (RRH), primarily through State funding. All SMAC RRH projects are evaluated based on two measures: a) minimize the length of time homeless and b) limit repeat episodes of homelessness. SMAC promotes Housing First for all supportive housing, which helps to minimize barriers and delays to accessing housing.

3. Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

There are four key institutional releases about which Washington County is most concerned. They include aging out of foster care, discharges from mental health facilities, discharges from correctional facilities and discharges from hospitals. Protocol is in place in Washington County
and in the state of Minnesota that no one is discharged from foster care without a stable home. Washington County has a discharge plan with all foster care youth at age 16 to assure that youth receive notice regarding their rights. They may stay in foster care until age 21 or choose to live independently and work with their case manager to identify and secure a permanent housing option. Discharge plans include housing and employment options.

Protocol is in place so that no one is discharged from a mental health facility without a stable home in which to live. Per state mandate, all persons committed to any of the state regional treatment facilities are assigned a mental health case manager through the county of the person discharged. Discharge planning begins while the individual is committed and before the person is discharged. Housing remains a part of the treatment plan after discharge to ensure housing is maintained/sustained. The plans include case management services, housing, employment, medical and psychiatric treatment, and aid in the readjustment to the community. In addition, the CoC has received a special allocation of state-funded rental assistance resources designed to facilitate smooth and stable transitions from state psychiatric hospitals to community-based living.

On a statewide level, the current discharge policy reflects policy enacted by the Minnesota Department of Corrections (DOC) with statutory authority granted by the MN Legislature. DOC provides a case manager to offenders and discusses the role of a case manager. In situations where an individual has no placement options or would be homeless follow release, the case manager assists with identifying and connecting the client with appropriate resources. DOC Adult Offender Reentry Services and Programming provides reentry services to offenders in collaboration with case management services. This includes the Presidential Prisoner Reentry Initiative (PRI), transition fairs, administering offender housing contracts, providing referrals, and offering a pre-release class to offenders. DOC provides payment for adult halfway house and emergency housing placement for eligible offenders that are on supervised release and conditional release.

The CoC has been actively engaging representatives from local hospitals and health care providers in 10-year plans to end homelessness. Committees work with hospitals to plan services and referral processes to assist persons being discharged. Releasing medically fragile people who do not have housing is a growing problem. There are medical respite beds available in the metro area and the CoC continues to work with other providers to establish a program that will house persons being released from hospitals without housing to go to. They will be able to stay in this housing until their medical needs are met or permanent housing with needed services is found.

4. Discussion

Washington County’s Housing Collaborative acts as the local Continuum of Care committee for this part of the SMAC region. Organizations within the continuum provide a number of homeless services and resources. The “prevention” end of the Continuum is largely made up of Washington County’s Housing Unit and Emergency Assistance Unit, nonprofits and faith based organizations.

Clients accessing assistance from public and private agencies enter the system through multiple doors. The Housing Collaborative, in conjunction with SMAC, is working to create a more coordinated assessment system for those that enter these multiple doors so that they can access appropriate resources quickly. Washington County is currently piloting a tool to help determine which households need prevention, which households need diversion assistance and which
households need shelter.
AP-75 Barriers to affordable housing – 91.220(j)

1. Introduction:

As noted above in the 2020-2024 Consolidated Plan, home values continue to increase in Woodbury both in terms of new construction housing as well as resale housing. Given the increasing land costs, the increased construction costs due to implementing the new State building code changes, and the general increase in labor and materials costs, this plan does not project that homeownership mortgage or rental lease rates will decline in the near or medium term. In the long-term, if construction of more moderately priced townhomes were to return to the builder portfolio in the region, this might change. A brighter side of the equation might be connected to wages. In fiscal year 2019, for example, the area median income according to HUD reached an all-time high of $100,000. As the economy improves, the number or proportion of households suffering from cost burden may improve as well.

2. Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City of Woodbury completed its decennial comprehensive plan update in August of 2019. This core planning document of the City guides land for the future construction of high density residential as well as mixed use areas that are potential sites for the future development of affordable housing. The City does not believe that its policies negatively affect or limit the ability to construction affordable housing. However, as an implementation step to the 2040 Comprehensive Plan, the City of Woodbury does intend to update its housing action plan in the near term.

3. Discussion:

Woodbury rejects the notion that its public policies lead to negative effects on affordable housing and residential development. A Guiding Principle of the 2040 Comprehensive Plan which serves as the primary planning document for the city states that “the City of Woodbury should encourage the development of a diversity of housing to accommodate people of all ages, income levels and family status. The City will identify areas for residential growth in a range of types, styles and affordability while maintaining high quality building standards and amenities.”

Beyond the realm of planning documents, Woodbury’s past performance in affordable housing also is worth noting. At the regional level in the Twin Cities, the Metropolitan Council assigns communities an allocation of affordable housing need and a subsequent Livable Communities affordable housing goal. For the period from 1996-2010, Woodbury met both its affordable ownership and affordable rental goal. Woodbury was one of only six cities in the seven-county area to meet these goals.

From an operational perspective moving forward, Woodbury updated its density policy on September 25, 2019 via Council Resolution 19-146 authorizing Council Directive CD-COMDEV-3.23. This density policy specifically provides the City Council with a tool to offer density bonuses to development projects when affordable housing or assisted living units are the focus of the development. Additionally, the City continues to use the power of its municipal HRA levy to finance affordable housing initiatives.
AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

Within the purview of this Plan, the greatest need in Woodbury is the creation of affordable housing. While Woodbury has a good rapport with a wide variety and number of affordable housing developers, there is a lack of developers qualified as Community Housing Development Organizations (CHDO). A lack of CHDO developers may ultimately lead to a reduction in the amount of available HOME funds that could be used to address high priority needs.

Actions planned to foster and maintain affordable housing

In addition to the planned use of CDBG and HOME funds, the municipal HRA continues to invest its levy funds in two municipal loan programs offering both homebuyer as well as home improvement options to low- and moderate-income households.

Actions planned to reduce lead-based paint hazards

Woodbury does not currently have a specific plan to combat lead-based paint hazards given the relatively small number of homes that may contain lead-based paint hazards. However, remediation of these hazards is an eligible expense of the locally funded Neighborhood Reinvestment Fund. Section SP-65 of the 2020-2024 Consolidated Plan estimates that fewer than 90 low- or moderate-income households in Woodbury are exposed to lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

According to Table DP03 of the 2017 ACS, 3.6 percent of people in Woodbury had income that was below the poverty level in the past twelve months of the survey. Much of the efforts in Woodbury that target the reduction or elimination of poverty are initiatives of the County or the state. The City endorses these initiatives and supports them in ways such as promoting the work of the Workforce Development Board. Below, please see some of the County anti-poverty programs that benefit Woodbury.

The Washington County CDA administers the Housing Choice Voucher Family Self Sufficiency Program (FSS). In 2019 the CDA program had 22 participants. The Family Self-Sufficiency (FSS) program enables families assisted through the Housing Choice Voucher (HCV) program and Public Housing (PH) residents to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so they can obtain skills necessary to achieve self-sufficiency.

Washington County will work closely with the Minnesota Department of Human Services in state planning and intervention related to reducing family poverty. One is an anti-racism initiative that is intended to promote diversity in operations and to improve cultural competency in service delivery. Another is a disparity in outcomes initiative which specifically relates to improving success in helping poor families from racial and ethnic minorities to achieve self-sufficiency. Finally, an integrated services project within the Workforce Center seeks to improve
services and outcomes by improving communications and strengthening collaboration within Washington County and the larger service community.

**Actions planned to develop institutional structure**

Between the combined efforts of the City, Washington County and its CDA, the institutional delivery system functions effectively given the leverage and partnerships with local non-profit and faith-based communities.

There exists a gap in qualified Community Housing Development Organizations (CHDO) in Woodbury. Due to restructuring of the Two Rivers CLT, the organization no longer qualifies for CHDO status. Twin Cities Habitat for Humanity is also currently restructuring its CHDO operations and may no longer qualify as a CHDO in the future.

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

The agencies which comprise the Housing Collaborative and SMAC work very closely with each other, fostering coordination of efforts and services. SMAC has developed a coordinated access program for persons to access their homeless prevention, supportive services and transitional housing through three access points.

**Discussion**

These supporting actions are necessary for the success of the Annual Action Plan and strategic plan of the Consolidated Plan.
Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

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

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

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

Total Program Income: 0

Other CDBG Requirements

1. The amount of urgent need activities 0

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

Discussion

With regard to program income and question 1 above, the City of Woodbury typically receives program income in small increments that are repurposed almost instantly in the next drawdown of funds. Per HUD requirements, the City of Woodbury always draws on available program income prior to requesting a reimbursement of grant funds via the Department of Treasury line of credit.

This Annual Action Plan is specific to PY20.
Grantee Unique Appendices

1. Introduction

The Citizen Participation Plan, hereafter referred to as CPP, is the framework that sets forth the policies and procedures the Dakota County Consortium will follow to provide for and encourage public participation in the development of the jurisdictional Consolidated Plan and Assessment of Fair Housing (AFH). The goal is to involve and partner with all local citizens, neighborhoods and areas impacted in the implementation of the housing and community development programs provided by the Consortium members. The CPP also applies to any substantial amendments to the Consolidated Plan, to the preparation of the Annual Action Plans, to the performance report which evaluates the progress in meeting the Consolidated Plan objectives and to the AFH.

The provisions of the CPP fulfill the statutory and regulatory requirements pursuant to 24 CFR parts 91 et al, the Dakota County Consortium is required to adopt as formula grantees of HUD entitlement fund programs. The Dakota County Consortium receives entitlement funds from the following three programs: Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG). These programs provide approximately $4.5 million in federal grants for community economic development and housing priorities. The Dakota County Consortium also applies for other federal funding such as Shelter Plus Care (S+C), Supportive Housing Program (SHP) and Neighborhood Stabilization (NSP) to achieve its objectives. Dakota County is the only recipient of ESG funds. As such, all references in this document related to ESG uses pertain only to Dakota County.

This is the overall Citizen Participation Plan for the Dakota County Consortium. Each member community must meet the minimum requirements set forth herein. However, members are free to add opportunities for citizen participation beyond those required here.

2. Definitions

The Dakota County Consortium, here on referred to as the Consortium, members are made up of Anoka County, Suburban Ramsey County, Washington County, and the City of Woodbury. Dakota County is the lead agency for the Consortium and has appointed the Dakota County Community Development Agency (CDA) the lead entity responsible to oversee the administration of the Consortium and submit all consolidated planning documents to HUD.

Each Consortium member is considered a formula grantee for CDBG funds on their own; as an authorized formation for the purpose of receiving HOME funds; and Dakota County only receives ESG funds. A fourth grant, which the Consortium is not a direct recipient of, Housing Opportunities for Persons with AIDS (HOPWA), is regionally covered by the City of Minneapolis which administers HOPWA funding for the metropolitan area.
A federal formula grant is awarded to a jurisdiction based upon a formula that takes into account factors such as the number of households in poverty, age of housing stock, population and economic growth, and the number of cases of AIDS in the metropolitan area. The U.S. Congress appropriates federal grants annually so each grant amount may vary from year to year.

Each grant fund is subject to specific regulatory requirements and has specific applications for which the funds can be spent.

- The Community Development Block Grant (CDBG) is a flexible program that grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities.
- The HOME Investment Partnership (HOME) provides formula grants to States and localities that communities used-often in partnership with local nonprofit groups to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership or provide direct rental assistance to low-income people.
- The Emergency Solutions Grant (ESG) recipients are state governments, large cities, and urban counties who provide assistance for individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.
- Housing Opportunities for Persons with AIDS (HOPWA) is provided to the eligible metropolitan statistical area (MSA) and can be used for a variety of housing and services for people living with HIV and their families.

As recipients of these formula grant funds, the Consortium is required to produce the following documents:

- The Consolidated Plan is a five-year planning document intended to establish a unified vision for community development, outlines coordinated strategies to address community needs related to housing and economic development, identifies proposed programs and establishes goals and projected accomplishments over the five-year period.
- Annual Action Plan is the annual planning document that describes how the specific federal formula funds are going to be spent over the course of the upcoming program year and the projects that will be undertaken to accomplish the strategies and goals that were set forth in the five-year Consolidated Plan.
- Consolidated Annual Performance and Evaluation Report (CAPER) is the annual report that evaluates the uses of the formula grants, outlines the yearly expenditures, and assesses the jurisdictions’ progress at implementing their Annual Action Plan as well as reaching the goals set in the five-year Consolidated Plan.
- Assessment of Fair Housing (AFH) is an analysis of fair housing issues in the Consortium’s jurisdictions and region that results in goals that inform the strategies and actions of the Consolidated Plan and the Annual Action Plan.1

1 HUD published three Notices on May 23, 2018 in the Federal Register clarifying Consolidated Plan program participants’ legal obligation to affirmatively further fair housing. The Notice announced HUD has withdrawn the current version of the Local Government Assessment Tool, which is used to complete the Assessment of Fair Housing (AFH). Therefore, the Consortium must continue to comply with applicable fair housing planning procedures, meaning the Consortium should comply with existing Analysis of Impediments (AI) to fair housing choice requirements by having an up-to-date AI and taking action to affirmatively further fair housing in accordance with the AI.
Substantial Amendment is an amendment to any of the aforementioned documents by which a "substantial change" in priority need/objective or planned activity is to occur. A "substantial change" is defined further in the Citizen Participation Plan.

The Consortium's fiscal/program year runs July 1 through June 30. The Consortium must submit its Consolidated Plan by May 15 in the year it is due, Annual Action Plans by May 15 each year, and CAPERs by September 25 each year.

The intent of the grants is to principally benefit low- and moderate-income persons or low-and moderate-income neighborhoods:

- Moderate-income is a household whose income is 80% or less of the area median income (AMI).
- Low-income is a household whose income is below 50% AMI.
- A low-and moderate-income neighborhood is a geographic area where more than 51% of the households have incomes that are at or below 80% of AMI.
- Area Median Income (AMI) is the median income determined by HUD for a particular area. HUD sets the area median income each year by publishing a table that shows median income for households of different sizes. Find the area median income table at: http://www.huduser.org/portal/datasets/a.html

All members of the Consortium are a part of the Minneapolis-St. Paul-Bloomington MSA.

3. Encouraging Citizen Participation

Interested groups and individuals are encouraged to provide input into all aspects of the Consortium's consolidated planning activities, from assessing needs and setting priorities through performance evaluations. The CPP outlines the Consortium's responsibility for providing opportunities for active participation from citizens of all income levels to contribute information, ideas, and opinions about ways to improve our neighborhoods, promote housing affordability, and enhance the delivery of public services to local residents.

In developing its Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER and AFH, the Consortium will take appropriate actions to encourage citizen participation by all residents of the Consortium-member communities, emphasizing the involvement of:

- Low-and moderate-income persons, particularly those living in areas where federal funds are proposed to be used;
- Residents of predominantly low-and moderate-income neighborhoods;
- Minorities;
- Persons with Limited English Proficiency;
- Persons with disabilities;
- Residents of public and assisted housing developments; and
- Local and regional institutions, the regional Continuum of Care (known as SMAC) and other organizations including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations.
Each member will decide how best to engage the citizens within their jurisdiction. Each member must afford its citizens the opportunity to comment on the development of the Consolidated Plan/Annual Action Plan, AFH and on performance reports (CAPER) by way of a public comment period and a public hearing. Additional methods the public may be engaged:

- Community meetings
- Focus groups
- Surveys
- Public Housing Agency (PHA) plans

a. Public Hearings

Each member of the Consortium individually will typically conduct at least two public hearings a year to obtain citizens' views and respond to comments and questions. An additional public hearing will be held during the year AFH is being developed. The hearings will take place at different stages of the planning processes. At least one public hearing will be held to solicit comments on the development of the Consolidated Plan and/or Annual Action Plan and AFH, which includes the proposed uses of CDBG, HOME and ESG funds or fair housing issues. Another public hearing will occur during the development of the CAPER, which will be held prior to the submission to HUD. Information about the time, location and subject of each hearing will be provided to citizens through the adopted public notice procedures.

As the lead entity for the Consortium, the Dakota County Board of Commissioners will hold a public hearing prior to the submission of the Consolidated Plan and/or Annual Action Plan to the U.S. Department of Housing and Urban Development (HUD). Governing boards of other consortium members may also hold public hearings for their residents.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times to accommodate work and school schedules, preferably in the evening, and at locations where people most affected by proposed activities can attend. The Consortium will utilize public hearing facilities that are accessible to persons with mobility impairments, usually libraries, administration buildings, or city halls. The Consortium will also utilize virtual public meeting technology when necessary to comply with federal, state, or local emergency orders issued for public health, natural or other declared disasters, or for other reasons as may arise from time to time. Each Consortium member will provide detailed information to the public about the virtual public meeting technology that will be used and how the public can provide comments during the public meetings.

If notice is given at least seven (7) days before a hearing date, the Consortium will provide reasonable accommodations for limited English proficient persons and persons with visual and/or hearing impairments. Each Consortium member will follow their adopted LEP plans.

b. Public Notices and Publication of the Proposed Consolidated Plan

A public notice will be published in one or more newspapers of general circulation at least ten (10) days prior to the public hearing but not more than two (2) weeks. When possible, the Consortium will utilize display notices in newspapers of general circulation. Due to the high cost of publishing in print media, a summary of the proposed Consolidated Plan and/or Annual Action Plan will be published. Consortium members will post either a full document or an executive summary on their website and any other websites deemed appropriate.
The information to be provided to the public on or before the public hearing will include:

1. The amount of assistance the local government expects to receive (including grant funds and program income);
2. The range of activities that may be undertaken;
3. The estimated amount of funding that will benefit person of low-and moderate incomes; and
4. The anti-displacement and relocation plan

Either the full document or an executive summary of the Consolidated Plan, Annual Action Plans, CAPER and/or AFH will be made available at the main office of each Consortium member and at various locations throughout the Consortium member’s jurisdiction. Locations would include public libraries, government centers, and city halls.

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan or AFH by contacting the main office of the Consortium member(s). A list of contact information can be found on page 7 of the CPP.

Public Comments

Citizens and other interested parties may present oral comments at the time of a hearing and/or submit written comments. A public comment period of not less than thirty (30) days will be afforded for the Consortium to receive comments from citizen on its proposed Consolidated Plan and/or Annual Action Plan, any substantial amendments to the plans and AFH.

COVID-19 PANDEMIC WAIVERS: HUD released a memo on March 31, 2020 that provided waivers to certain provisions of federal statutes pertaining to the 30-day public comment period due to the COVID-19 pandemic for the Consolidated Plan and Annual Action Plans. Dakota County informed the Minneapolis Field Office on April 8, 2020 that it would utilize the waivers to reduce the public comment period from 30 days to no less than five days for any substantial amendments to the FY 2020 Action Plan and FY 2019 Action Plan to use funds from these years for activities related to the COVID-19 pandemic. HUD also released memos on April 10, 2020 that provided waivers due to the COVID-19 pandemic for the HOME Program. The Dakota County HOME Consortium informed the Minneapolis Field Office on April 17, 2020 that Consortium members would utilize the waivers to reduce the 30-day comment period to not less than five days. This waiver is in effect for any necessary substantial amendments to FY 2020 and earlier Consolidated Plans or Action Plans.

The public comment period for the CAPER will be fifteen (15) days.

The Consortium will consider all comments or views of citizens received in writing or orally at public hearings and during the public comment period in preparing the final Consolidated Plan and/or Annual Action Plan or AFH. A summary of these comments or views, and a summary of any comments or views not accepted and any such reasons therefore not accepted, shall be included in the applicable Consolidated Plan and/or Annual Action Plan or CAPER of AFH.

Consortium members are required to respond to complaints. See section 7 of the CPP for further details on the process members will follow.
d. Technical Assistance

Groups or individuals interested in obtaining technical assistance to develop project proposals or apply for funding assistance through HUD formula grant programs covered by the Consolidated Plan may contact staff of the Consortium. The level and type of assistance provided is determined by the Consortium member. Receiving technical assistance does not guarantee award of funds.

4. Displacement and Relocation

Each Consortium member prepares an anti-displacement and relocation plan. Consortium members attempt to avoid displacement whenever possible, while realizing that in some situations it is unavoidable. In the event displacement occurs, Consortium members will follow their HUD approved Anti-displacement and Relocation Plans. These plans are available for review upon request.

5. Amendments to the Consolidated Plan or Annual Action Plans

The CPP requires the Consortium to identify the criteria it will use for determining what constitutes a substantial amendment to the Consolidated Plan and/or Annual Action Plans. The Consortium shall amend its approved plan whenever it makes one of the following decisions:

- An activity included in a consolidated plan or annual action plan is canceled;
- An activity not previously included in a consolidated plan or annual action plan is added;
- An activity’s budget is increased or decreased by $100,000.00 or more at one time;
- The location and/or national objective of an activity changes;
- The allocation priorities within a Consortium member’s jurisdiction change.

Notice announcing the requested substantial amendment and the start of a thirty (30) day public comment period will appear in one or more newspapers of general circulation. After the comment period, the requested change goes before the appropriate governing body for approval. Changes that occur that do not meet the above definition are considered administrative in nature and do not go through the substantial amendment process. These changes are made internally and appear in the CAPER at the end of the program year.

COVID-19 PANDEMIC WAIVERS: HUD released a memo on March 31, 2020 that provided waivers to certain provisions of federal statutes pertaining to the 30-day public comment period due to the COVID-19 pandemic for the Consolidated Plan and Annual Action Plans. Dakota County informed the Minneapolis Field Office on April 8, 2020 that it would utilize the waivers to reduce the public comment period from 30 days to no less than five days for any substantial amendments to the FY 2020 Action Plan and FY 2019 Action Plan to use funds from these years for activities related to the COVID-19 pandemic. HUD also released memos on April 10, 2020 that provided waivers due to the COVID-19 pandemic for the HOME Program. The Dakota County HOME Consortium informed the Minneapolis Field Office on April 17, 2020 that Consortium members would utilize the waivers to reduce the 30-day comment period to not less than five days. This waiver is in effect for any necessary substantial amendments to FY 2020 and earlier Consolidated Plans or Action Plans.
6. Access to Records

The Consortium will provide citizen, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and/or, Annual Action Plans, CAPER and AFH and the use of funds under the CDBG, HOME and ESG programs during the preceding five years.

A hard copy of the final adopted Consolidated Plan, Annual Action Plans, CAPER and AFH will be available for public inspection during normal business hours of the Consortium members’ main office. Electronic versions of the aforementioned documents are available at all times on the Consortium members’ websites. Residents without computers and/or internet access may gain access to the documents at any public library location throughout the Consortium’s jurisdictions.

If requested, the public will be provided a reasonable number of free copies of each aforementioned document within a reasonable period of time. If requested, the document will be provided in alternative formats within a reasonable period of time and mailed copies to those who are homebound.

7. Response to Written Citizen Complaints

The Consortium will, to the best of its ability and to the extent possible, provide within fifteen (15) working days a written response to any complaint related to the Consolidated Plan, Annual Action Plans, Substantial Amendments, CAPER, AFH or Citizen Participation Plan made in writing to the appropriate Consortium member. A list of contacts is available in section 10 of the CPP.

8. Amendments to the Citizen Participation Plan

The Consortium will provide citizens with a reasonable opportunity, no less than ten (10) days, to comment on any substantial amendments to the Citizen Participation Plan.

COVID-19 PANDEMIC WAIVERS: HUD released a memo on March 31, 2020 that provided waivers to certain provisions of federal statutes pertaining to the 30-day public comment period due to the COVID-19 pandemic for the Consolidated Plan and Annual Action Plans. Dakota County informed the Minneapolis Field Office on April 8, 2020 that it would utilize the waivers to reduce the public comment period from 30 days to no less than five days for any substantial amendments to the FY 2020 Action Plan and FY 2019 Action Plan to use funds from these years for activities related to the COVID-19 pandemic. HUD also released memos on April 10, 2020 that provided waivers due to the COVID-19 pandemic for the HOME Program. The Dakota County HOME Consortium informed the Minneapolis Field Office on April 17, 2020 that Consortium members would utilize the waivers to reduce the 30-day comment period to no less than five days. This waiver is in effect for any necessary substantial amendments to FY 2020 and earlier Consolidated Plans or Action Plans.

9. Availability of the Citizen Participation Plan

Copies of the Citizen Participation Plan may be obtained by contacting the appropriate Consortium member. Upon request, Consortium members will make the plan available in an alternative format of anyone requested a special accommodation.

Dakota County Consortium Citizen Participation Plan
## Contact and Resource Information

<table>
<thead>
<tr>
<th>If a resident of</th>
<th>Contact</th>
<th>Address &amp; Phone Number</th>
<th>Web Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anoka County</td>
<td>Community Development Manager</td>
<td>Anoka County Courthouse 2100 Third Ave Suite W-250 Anoka, MN 55303 763-324-4813</td>
<td><a href="http://www.co.anoka.mn.us">www.co.anoka.mn.us</a></td>
</tr>
<tr>
<td>Dakota County</td>
<td>Community &amp; Economic Development</td>
<td>1228 Town Centre Drive, Edina, MN 55423 612-675-4400</td>
<td><a href="http://www.dakotaland.gov">www.dakotaland.gov</a></td>
</tr>
<tr>
<td>Ramsey County</td>
<td>Community &amp; Economic Development</td>
<td>250 Ramsey County Court House 15 W Kellogg Blvd St Paul, MN 55102 651-266-8000</td>
<td><a href="http://www.co.ramsey.mn.us">www.co.ramsey.mn.us</a></td>
</tr>
<tr>
<td>Washington County</td>
<td>Housing &amp; Redevelopment</td>
<td>Washington County HRA 7545 Curnell Boulevard Woodbury, MN 55125 651-428-0395</td>
<td><a href="http://www.wchra.com">www.wchra.com</a></td>
</tr>
<tr>
<td>Woodbury</td>
<td>Community Development Coordinator</td>
<td>8301 Valley Creek Road Woodbury, MN 55125 651-414-3438</td>
<td><a href="http://www.cityofwoodbury.mn.us">www.cityofwoodbury.mn.us</a></td>
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The Dakota County Consortium Adopted a Citizen Participation Plan: 5/1990

Since then it has been revised:

<table>
<thead>
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<th>Year</th>
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</tr>
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<tbody>
<tr>
<td>6/2009</td>
<td>5/2010</td>
</tr>
<tr>
<td>7/2012</td>
<td>5/2013</td>
</tr>
</tbody>
</table>

Dakota County Consortium Citizen Participation Plan
PURPOSE

Federal regulations as required within 24 CTR 92 place certain restrictions on HOME-assisted units in order to ensure long-term affordability of the HOME units. If ownership of a HOME-assisted unit is transferred during the period of affordability these restrictions come into play. The HOME program allows for two different options: Resale and Recapture. These tools ensure that the HOME subsidy invested in the unit continues to be used for affordable housing during the period of affordability.

This Resale/Recapture Policy of the Dakota County HOME Consortium hereinafter referred to as “the Consortium” shall identify how and when each option shall be used to ensure long-term affordability of HOME-assisted units. This document describes two policies in detail:

1. Length of Affordability Periods of HOME-assisted units in the Consortium; and
2. The use of Resale versus Recapture.

POLICY

Section 1: Length of Affordability Period of HOME-Assisted Units in the Consortium

Federal regulations impose minimum restrictions on long-term affordability but each Consortium member reserves the right to require stricter standards should they choose to do so. The HOME rule ties the length of a unit’s affordability period to the amount of HOME investment in the units. Specifically, 24 CFR 92.254(d)(4) mandates the following timelines for homeownership unit affordability periods and 24 CFR 92.252(e) mandates the following timelines for rental unit affordability periods:

<table>
<thead>
<tr>
<th>HOME Assistance Per Ownership Unit</th>
<th>Minimum Affordability Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>$15,000 to $40,000</td>
<td>10 Years</td>
</tr>
<tr>
<td>$40,001 to $100,000</td>
<td>15 Years</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HOME Assistance Per Rental Unit</th>
<th>Minimum Affordability Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehab or Acquisition of Existing Unit</td>
<td>10 Years</td>
</tr>
<tr>
<td>$15,000 to $40,000</td>
<td>10 Years</td>
</tr>
<tr>
<td>$40,001 to $100,000</td>
<td>15 Years</td>
</tr>
<tr>
<td>Rehab Involving Refinancing</td>
<td>15 Years</td>
</tr>
<tr>
<td>Acquisition of Newly Constructed Units</td>
<td>20 Years</td>
</tr>
</tbody>
</table>

CD-COMDEV-3.14 HOME Affordability Periods and Resale-Recapture Policy
Each HOME unit activity funded by the Consortium shall be governed by a written agreement that will include an explicit definition of the required affordability period for the project. It is the intention to use the federally required minimum affordability period as listed above unless otherwise directed by the Consortium to require a longer affordability period. The affordability period shall commence on the day that the project is entered into the federal Integrated Disbursement and Information System (IDIS) as a completed project.

Section 2: The Use of Resale Versus Recapture

As mentioned above, 24 CFR 92.254(a)(5) identified the resale and recapture options as defined below as the only two acceptable methods for securing the long-term affordability of HOME-assisted units.

**Key Resale/Recapture Term Definitions:**

1. **Direct Subsidy:** A direct subsidy consists of financial assistance that reduces the purchase price from fair market value to an affordable price or otherwise subsidizes the purchase, i.e., down payment, purchase price discount, or closing cost assistance.

2. **Development Subsidy:** A development subsidy is the difference between the cost to develop housing and the fair market price (appraised value). This type of subsidy to the developer is an **indirect subsidy**. For example, the Consortium may provide $20,000 in grant funds to a developer to rehabilitate a home, the after rehab value is only $15,000 because of neighborhood and market conditions. The $5,000 difference is a development subsidy. While the subsidy does not go directly to the homebuyer, it helps make the development of the home feasible.

3. **Homebuyer Investment:** The homebuyer's investment consists of the portion of initial down payment paid by the homebuyer combined with the value of any capital improvements made with the homebuyer's funds.

4. **Net Proceeds:** The net proceeds of a sale are an amount equal to the sales price minus non-HOME loan repayments and any closing costs. There are no circumstances wherein the Consortium will recapture more than is available from the net proceeds of the sale.

5. **Period of Affordability:** HOME regulations require that assisted properties remain affordable for a specific period of time depending on the level of HOME funds invested. As described above, the Consortium identifies its own affordability periods that are equal to or longer than the HUD-required minimum period.

6. **Noncompliance:** Failure to comply with the resale or recapture requirements means that:
   a. The original HOME-assisted homebuyer no longer occupies the unit as his/her principal residence (i.e., unit is rented or vacant), or
   b. The home was sold during the period of affordability and the applicable resale or recapture provisions were not enforced.

**Resale:** Under the resale option, if the current homeowner decides to sell his/her home during the period of affordability the new homeowner must be income-qualified under the HOME program and must occupy the home as his/her principal residence. The original HOME-assisted owner must receive a fair return on investment, which is based on the initial investment plus improvements, as identified below. Additionally, the sale price must be affordable to a range of subsequent low-income owner-occupied households.
As required by 24 CFR 92.254(a)(5), the Consortium must ensure that the price at resale provides the original HOME-assisted owner a fair return on investment. The Consortium shall meet this requirement by using the percentage change in the Consumer Price Index (CPI) as its standard index for Fair Return on investment over the period of ownership. The Consortium will multiply this percentage change by the combined amount of down payment funds provided by the initial owner at the time of purchase and the cost of capital improvements made by the initial owner during the ownership period. This multiplied amount, plus the original value of the down payment funds and capital improvement made, will constitute the fair return to the original homebuyer in the event there are net proceeds available from the resale.

Capital improvements will include improvements made to the property that adds basis to the home as defined within IRS Publication 523. The initial homeowner must keep written documentation regarding the costs of capital improvements, including receipts or copies of contracts and payments made to contractors, in order to receive credit for the value of the capital improvements at resale. The initial homeowner must also keep written documentation confirming the necessary permitting and inspection processes were followed, when applicable.

A fair return on investment to the initial homebuyer may be less than the full value calculated above or no return if there are no or insufficient net proceeds from the resale. This can occur when market conditions are such that the median sales price has stagnated or decreased during the ownership period or when the initial homebuyer has paid more for capital improvements than can be supported by the market at the time of resale.

To provide continued affordability of the property, the Consortium will ensure that home is affordable to a range of homebuyers at the time of resale. The targeted population of such buyers will include households with incomes between 50% and 80% Area Median Income (AMI) who pays no more than 30% of gross income for principal, interest, property taxes, homeowner association dues, and insurance. If providing funds as a development subsidy, the targeted income range of subsequent buyer may be of lower incomes as defined in a written agreement between the Consortium member and the recipient of the development subsidy. If the market price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent buyer within the targeted range to purchase the property, the Consortium, at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer.

It is important to note that in certain circumstances, such as a declining housing market where home values are depreciating, the original homebuyer may not receive a return on his/her investment because the home sold for less or the same price as the original purchase price.

Recapture: The recapture option requires that a HOME-assisted homeowner must occupy that home as his/her principal residence throughout the period of affordability. In the event that the owner ceases to occupy the home as his/her principal residence during the period of affordability this shall be deemed to constitute a violation of the written agreement governing the use of funds and all HOME funds shall be required to be repaid. The recapture option also requires that all or a portion of the direct HOME subsidy be reimbursed to the Consortium if the homeowner decides to transfer the property within the period of affordability.
The maximum amount of the HOME subsidy that may be recaptured is capped at the amount of available net proceeds. The net proceeds of a sale are an amount equal to the sales price minus non-HOME loan repayments and any closing costs. The homeowner may transfer the house at whatever price the market will bear and to any person regardless of income. Recaptured funds must be used for HOME-eligible activities. The recapture option is only available to HOME funds that were a direct subsidy to the homeowner. The direct subsidy may be provided in conjunction with a development subsidy; however, the affordability period is based on the direct subsidy. The recapture option cannot be used on HOME funds that are solely considered development subsidies.

If HOME funds are a loan to a homebuyer, the homebuyer shall be allowed to retain all appreciation; however, the mortgage and note that secure the HOME funds shall determine the structure in which principal and interest are repaid during the term of the loan.

Section 3: Consortium Uses
Determination of when Resale or Recapture will be used:
- When HOME funds are awarded as an indirect subsidy to a developer for a homebuyer activity, the resale option will be used.
- When HOME funds are used to provide a direct subsidy to homebuyer(s), the recapture option will be used.

Section 4: Enforcement Documentation
The affordability period of any HOME-assisted units shall be governed by a legal instrument recorded at the appropriate County Recorder's office. This same instrument shall also identify and enforce the resale or recapture provisions of the HOME program. Such documentation shall be provided by the Consortium member and may include one or more of the following depending on the type of project:
1. Resale:
   a. Deed Restriction; or
   b. Declaration of Covenant.
2. Recapture:
   a. Anoka County - Recorded Repayment Agreement and Note;
   b. Dakota County - Mortgage and Note;
   c. Ramsey County - Grant of Lien, Note and Declaration;
   d. Washington County - Mortgage, Note and Declaration;
   e. City of Woodbury - Mortgage and Note.

The precise nature of the documentation will be identified in the written agreement that governs the usage of the HOME funds in the project. Please contact the appropriate Consortium member to ensure the correct document for enforcement of the HOME resale/recapture provision is used and recorded.

HOME Written Agreement. The HOME written agreement must be a separate legal document from any loan instrument and must, at a minimum, comply with the requirements at 24 CFR 92.504(o)(5) of the HOME rule. If the Consortium member provides HOME funds to a subrecipient or CHDO to develop and sell affordable housing, the Consortium member must prepare and execute the agreement with the buyer, or be a party to the agreement along with the entity it funded to ensure it can enforce the written agreement. See Exhibits A and B to this Policy.
The executed HOME written agreement with the homebuyer must be recorded at the appropriate County Recorder's office when resale or recapture is used.

Section 5: Ongoing Monitoring
For HOME-assisted homebuyer projects under resale or recapture agreements, the Consortium will perform ongoing monitoring of the principal residency requirement during the period of affordability to confirm that the buyer is using the property as his/her principal residence. This can be accomplished through a variety of means, including, but not limited to verification of the buyer's name on utility company records, insurance company records for the home, property records verification, and or postcard or letters mailed with "do not forward" instructions can demonstrate whether the buyer is receiving mail at the home.
Exhibit A: Homebuyer Agreement: Woodbury First-Time Homeownership Program

Exhibit B: Homebuyer Agreement: Woodbury Foreclosures Purchase Program

Adopted by the Woodbury City Council on September 8, 2010 – Resolution No. 10-119
Revised by the Woodbury City Council on September 28, 2011 – Resolution No. 11-120
Revised by the Woodbury City Council on July 25, 2012 – Resolution No. 12-97
Revised by the Woodbury City Council on November 18, 2015 – Resolution No. 15-178
Statement regarding fair housing

During previous program year cycles, the Annual Action Plan has included a section labeled “AP-25 Affirmatively Furthering Fair Housing Reducing and Alleviating Barriers to Fair Housing”. For this 2020-2024 Consolidated Plan and its 2020 Annual Action Plan, that section was not available in HUD’s eConPlanning Suite in IDIS and as such there was not a section to discuss fair housing.

The certifications that are uploaded in Section AD-25 of this 2020-2024 Consolidated Plan include a statement that Woodbury, as a jurisdiction, will affirmatively further fair housing.

Currently, within the Twin Cities region, the most recently completed regional analysis of fair housing choice (AI), as well as its subsequent addendum were completed several years ago and remain in effect. Both the AI itself as well as the addendum are located on Woodbury’s fair housing web page, accessible via https://www.woodburymn.gov/departments/housing/fair_housing.php.

In the Twin Cities region, the CDBG and HOME entitlement jurisdictions have banded together through a cooperative funding agreement to establish the Fair Housing Implementation Council (FHIC) to undertake a regional AI in recognition of the notion that fair housing as a public policy concern does not respect municipal or county borders. In addition to the entitlement jurisdictions, the Carver County Community Development Agency, the Scott County Community Development Agency and the Metropolitan Council participate in and help fund the AI to ensure that the process encompasses all seven counties of the metropolitan area.

The regional AI serves as a catalyst to affirmatively further fair housing. The AI documents, in conjunction with previously conducted AIs, existing impediments to fair housing, determines their relative severity, and explores remedies, as well as other actions that an entitlement jurisdiction may take or recommend be undertaken to affirmatively further fair housing. While the AI does identify specific impediments to fair housing along with recommendations to address those impediments, the final actions, certification and methodology for an entitlement jurisdiction to affirmatively further fair housing are evaluated by HUD through the Consolidated Plan, Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) processes. The FHIC also implements fair housing activities that impact the greater region and that may be more effectively implemented on a broader scale.

As of the May 13, 2020 approval by the City of Woodbury of its 2020-2024 Consolidated Plan, the FHIC was still in the process of creating and finalizing its next AI which will run chronologically parallel to the 2020-2024 Consolidated Plan. Once this process is complete, said 2020 AI will be made publicly available on the City’s website via the weblink referenced above.