

Executive Summary

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

1. Introduction

Pursuant to the Housing and Community Development Act of 1974, the City of Moorhead is designated as an entitlement community and therefore receives an annual allocation of Community Development Block Grant (CDBG) funds from the US Department of Housing and Urban Development (HUD). CDBG funds are used to develop viable urban communities by providing decent housing, suitable living environments, and economic opportunities, primarily to low- and moderate-income persons.

The 2024 Annual Action Plan was developed using citizen participation, current statistics, and alignment of activities with goals and objectives outlined in the corresponding, approved 5-Year Plan. This Action Plan is a result of all planning efforts.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

According to 2020 Decennial Census, Moorhead has a population of 44,505 people and is included in the Fargo-Moorhead Metropolitan Statistical Area (MSA), which has an overall population of 249,843 people. The City has prepared this plan in collaboration with local service providers, area agencies, and citizens who share a common goal to address Moorhead's community development needs in a way that utilizes resources efficiently and thoughtfully.

See AP-20 which contains a table of the City's goals and objectives. For 2024, Moorhead plans to address affordable housing needs through homeowner housing rehabilitation, acquisition for affordable housing, supporting the efforts of governmental and private agencies through the provision of technical assistance, and the rehabilitation of an affordable rental housing development. Other objectives include addressing homeless needs through supporting the continuation of emergency, transitional, and permanent supportive housing and supporting the initiatives of these service providers to expand homeless prevention services including outreach, coordinated assessment, shelter services, transportation, and transitional housing through technical support, certificates of consistency for funding applications, transportation vouchers and other means. The City will address its objective of meeting non-homeless special needs services through supporting initiatives of service providers to maintain and expand services, outreach, and assessment for special needs populations through

technical support, certificates of consistency for funding applications and other means. The City will work to meet non-housing community development needs of low-income youth by providing positive recreational and developmental opportunities in local parks. 2024 projected outcomes include 6 home rehabilitation loans, 1-2 accessibility improvements to homes, discounted bus passes for 150 extremely low-income persons, recreational activity program for 65 youths.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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The year 2023 was the fourth year of a five-year Consolidated Plan cycle for housing and community development. The City of Moorhead's 2023 CDBG expenditures were consistent with its Consolidated Plan and one-year action plan. The City prioritized its available Community Development Block Grant (CDBG) resources on activities to maintain and create affordable housing opportunity within the community as follows:

Single Family Home Rehabilitation Loan Program: this program addressed affordable housing preservation by completing safety, energy, and structural improvements to six housing units occupied by low-moderate income households.

Homelessness Objectives: To reach out to low-income people many of whom are primarily homeless, CDBG funds were utilized for the Opportunities Under Transit (OUT) program which provides discounted bus passes for extremely low-income persons. This program is available to all individuals who are earning at 30% of the AMI with the majority of those who access the program are referred by one of our area homeless shelters. This program provides those who income qualify the opportunity to access transportation in the Moorhead area.

Other Non-housing Community Development: The City continued an important CDBG program in 2023, recreational opportunities for low-to-moderate income youth. In 2023, 25 kids participated in after school programming provided by Moorhead Park and Recreational Department, and 27 kids participated in the Youth Program with the Afro-American Development Center. The Moorhead Park program provides afterschool activities, assistance with homework and a healthy snack.

Non-homeless Special Needs Services: The City continued an important CDBG program in 2023 which provided snow removal service to homeowners who were senior and/or disabled. This important program provided these income qualifying homeowners to ability to safely access their homes

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Summary from citizen participation section of plan.

For the 2024 Annual Action Plan, a community public meeting was held to gain knowledge from the public on items of interest to be included in the 2024 Action Plan. This public meeting was held September 15, 2023. There was one individual from the community that attended the input meeting, and no comments were received.

A public hearing (12/11/2023), service provider and agency outreach for updates, and a 30-day comment period (11/23/2023 – 12/23/2023).

A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

The City worked to broaden public participation by holding a public meeting, a public hearing and encouraging participation in a 30-day comment period. The City advertised the public meeting, hearing and comment period in the official newspaper of the City. The City also sent out an electronic notification to registered subscribers in an effort to engage them in development of the plan. In order to accommodate disabled persons and non-English speakers, all advertisements included this language, "In advance of the public hearing, alternative formats of this information or accommodation for persons with disabilities or limited English proficiency will be made upon request (10-hour notice is required). To make arrangements for services, call 218-299-5434; for TDD/Relay service dial 711." No services were requested. The proposed action plan was made available on the City's website and at the public library and Moorhead Public Housing Agency. City staff also worked with local service agencies that service low-to-moderate income clientele in order to solicit input during the planning process.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

There were no public comments that were received during the public comment period for the 2024 Annual Action Plan. A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a

community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

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

All comments are accepted and considered in the development of the 2024 Action Plan.

7. Summary

The Executive Summary includes a brief introduction along with a summary of the objectives and outcomes identified in the need's assessment. Areas of need that were summarized related to housing, homelessness, non-homeless special needs, and non-housing community development needs. Brief sections on the evaluation of past performance and the citizen participation/consultation process were also included.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	MOORHEAD	City of Moorhead

Table 1 – Responsible Agencies

Narrative (optional)

The City of Moorhead is the Lead & Responsible Agency for the administration of the Community Development Block Grant (CDBG). The program is managed by the Governmental Affairs Department and the main contact is the Community Development Program Administrator.

Consolidated Plan Public Contact Information

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Community Development Program Administrator

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

For the 2024 Annual Action Plan, the citizen participation process included a community public meeting (09/15/2023), a public hearing (12/11/2023), service provider and agency outreach for updates, and a 30-day comment period (11/23/2023 – 12/23/2023).

A majority of in-depth citizen participation and consultation occurred during the development of the 5-Year Plan (2020-2024). Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the 5-Year Plan.

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(l))

In addition to required consultations with health and housing agencies in preparation of the Consolidated Plan, Moorhead City staff also has regular interaction with the following agencies: Moorhead Public Housing Agency (MPHA), Clay County Housing & Redevelopment Authority (CCHRA), Lakes and Prairies Community Action Partnership which manages a Family Homeless Prevention & Housing Assistance Program (FHPAP) and homebuyer education, Lake Agassiz Habitat for Humanity, Successful Outcomes for Tenants and Landlords (SOFTL), Fargo Moorhead Coalition to End Homelessness, West Central Minnesota Continuum of Care (CoC), and Creative Care for Reaching Independence (CCRI) (which help the special needs population to live and work independently), Churches United homeless shelters, MATBUS, and Legal Services of Northwest Minnesota (eviction mitigation).

All of the 24 local agencies that participated in the development of the 5-Year Plan are easily accessible and understand that the relationship with the City is reciprocal. Outreach during the citizen participation process energized relationships, providing opportunity for enhanced coordination between health and housing agencies and the City of Moorhead. The interconnectedness among local agencies is

also strong; they rely on each other for services and regularly collaborate to meet the needs of their clients. A coordinated assessment system further connects providers and clients to services and information.

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.

The City of Moorhead meets quarterly with the Coordinator of the West Central Minnesota Continuum of Care. The City is appreciated for ongoing support of homelessness projects, specifically with recent capital improvements at the Churches United Micah's Mission homeless shelter, food support and emergency housing assistance, all funded by CDBG-CV.

The City met with the West Central Minnesota Continuum of Care (CoC) lead contact to discuss needs and opportunities within the community. The City also worked with the CoC on sections of the Consolidated Plan to address needs related to homelessness. The City, in 2018 used CDBG funding to install a bus shelter in close proximity to Bright Sky Apartments which is a 43-unit permanent supportive housing development operated by Churches United for the Homeless. The CoC noted the network of non-profit service providers as one of Moorhead's greatest strengths/assets. Some of Moorhead's weaknesses noted by the CoC and other area agencies, with particular consideration of homeless persons or persons at risk of homelessness, were related to the lack of affordable housing opportunity, lack of case management resources, and public transportation gaps.

The City consulted and coordinated with public and private agencies that address housing, health, social services, victim services, employment, or education needs of low-income individuals and families, homeless individuals and families, including veterans, youth and persons with special needs. West Central CoC and Lakes & Prairies Community Action Partnership work very closely with those populations. The City actively works to support those organizations and subsequently to address the needs of those populations. The City has funded programs operated by those organizations. City staff actively participates in the CoC and attends quarterly meetings.

Public Transit. The Metro Area Transit (MATBUS) system has added routes, increased frequency, and extended hours on evening routes to accommodate rider needs. Ongoing marketing efforts (i.e., television, radio, billboard, newspapers, and website), are made to increase awareness of the service. MATBUS added two new Moorhead/Dilworth routes in 2014. One route increased access to southeast Moorhead where development efforts are ongoing. This new route opened up more employment opportunities, particularly for people who rely on public transit. Public transportation via MATBUS was provided at no cost during a significant portion of the pandemic.

Public Utilities Moorhead Public Service (MPS) rates are comparable to other regional providers because they do not add various adjustments to their bills called rate riders. MPS does not add fuel

adjustments, environmental costs, or conservation fees. There are energy assistance programs in the community through West Central Communities Action, Inc., Clay County Social Services, and Salvation Army to help with utility costs.

Police Transports. Due to jurisdictional restrictions, the Moorhead Police Department cannot transport a person across state lines who is being held on a peace officers 72-hour detox hold, which is a state statute that give police the authority under law to detain against a persons will for their own wellbeing. This authority is not legal in another state.

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

The City of Moorhead meets quarterly with the Coordinator of the West Central Minnesota Continuum of Care and also attends CoC Homeless to housed task force and meets on a regular basis with the FM Homeless

Coalition. The West Central Minnesota CoC has written standards for provision of ESG funds. The West Central CoC will continue to refine its written standards as the region adapts and further develops our regional CARES (Coordinated Assessment, Referral and Evaluation System) network and develops improved strategies for targeting resources. CARES is a system of assessing homeless client needs and tracking data among service providers. The community has transitioned into this system over the last 6 years. CARES is designed to reduce the amount of time a person is homeless or prevent homelessness by connecting clients to services faster. In the past, multiple needs assessments were conducted by multiple service providers, increasing client confusion and the amount of time a person waited to access services. CARES allow for a single needs assessment and a database; once the information is inputted into the system, all service providers can access the information and run reports. Needs are assessed using a Service Prioritization Decision Assistance Tool (SPDAT or VI-SPDAT). Area agencies are currently using the VI-SPDAT tool, which was designed for use in outreach assessment with homeless individuals; it combines the medical risk factors of the Vulnerability Index (VI) with the social risk factors of the SPDAT. Once clients are assessed, the end result produces a number used to rank needs by priority. Instead of the traditional first come-first serve concept, those who need help the most are the first to be connected to services. This tool has improved the service delivery system and further connects agencies. The City of Moorhead and the City of Fargo provided CDBG funding for the development of CARES.

The West Central Minnesota CoC focuses on chronic homeless, families with children, unaccompanied youth, and persons coming from the streets or emergency shelter. Chronic homeless persons and families are given priority in coordinated assessment, open shelter beds, and permanent supportive housing lists according to the CoC Coordinator. Families with children or unaccompanied youth are given priority in rapid-rehousing and transitional housing programs. The CoC may utilize funds for the following target areas: prevention, emergency shelter, motel voucher, domestic violence shelter, permanent housing, and transitional housing that includes programming related to financial literacy, rental assistance, case management, advocacy, and housing education. The City of Moorhead attends the discussions of the ESG programs and hears the evaluation of them and their outcomes. The CoC conducts quarterly program reviews.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Moorhead Public Housing Agency
	Agency/Group/Organization Type	Housing PHA Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted in person, over the phone, and through email multiple times during the planning period. Outcomes of the consultation are continued support for housing projects and technical assistance as needed. Moorhead Public Housing Agency (MPHA) discussed their current coordination with CAPLP (Community Action Lakes and Prairies) regarding homeless individuals sleeping in the stairwells and entrances. MPHA discussed how this has increased over the past year resulting in increased police calls to the building and increased drug activity. MPHA is coordinating with CAPLP's homeless outreach workers and meets with them weekly. the outreach workers have been given access to the building to do sporadic checks and walk throughs in hopes to interact and assist individuals who are not tenants but whom are sleeping in the common areas. The hope is to connect these individuals with appropriate services.

2	Agency/Group/Organization	Clay County Housing and Redevelopment Authority
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted over the phone and through email during the planning period. Outcomes of the consultation are continued support for housing projects, particularly permanent supportive housing projects for the homeless.
3	Agency/Group/Organization	LAKES AND PRAIRIES COMMUNITY ACTION PARTNERSHIPS
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless Services-Education

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted in person, over the phone, and through email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs and assets of the Moorhead community, partnering on solutions when needed.
4	Agency/Group/Organization	Churches United for the Homeless
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Churches United operates two homeless shelters and one food bank. Consulted via email and phone during the planning period. Outcomes of the consultation are maintaining relationships to better understand homelessness in Moorhead, partnering on solutions when needed. The City of Moorhead utilized funds from the CARES Act, CDBG-CV, for a renovation project with Churches United. These funds were utilized to build family rooms in the basement of the shelter, Churches United homeless shelter is the only shelter in a 250 mile radius that accepts single women, single men and families, a much-needed improvement to the shelter.
5	Agency/Group/Organization	Clay County Social Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Health Agency Child Welfare Agency Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Market Analysis Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via email during the planning period. Outcomes of the consultation are maintaining relationships to better understand needs in Moorhead, partnering on solutions when needed.
6	Agency/Group/Organization	West Central Minnesota Continuum of Care
	Agency/Group/Organization Type	Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via Webex during the planning period. Outcomes of the consultation are maintaining relationships to better understand homelessness in Moorhead, partnering on solutions when needed.
7	Agency/Group/Organization	Lake Agassiz Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted via phone and email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed.

8	Agency/Group/Organization	Cass Clay Community Land Trust
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted in person, via phone, and email during the planning period. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed.
9	Agency/Group/Organization	Sparklight
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted in person, via phone, and email during the planning period. Discussed market needs, service available in the community. Gathered information on accessibility of internet services for public housing tenants. Learned information on available programs for all low-income residents to access broadband services. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed, sharing program details with partners.

10	Agency/Group/Organization Agency/Group/Organization Type	Midco Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Business Leaders Major Employer
	What section of the Plan was addressed by Consultation?	Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted in person, via phone, and email during the planning period. Discussed market needs, service available in the community. Gathered information on accessibility of internet services for public housing tenants. Learned information on available programs for all low-income residents to access broadband services. Outcomes of the consultation are maintaining relationships to better understand the needs of people living in Moorhead, partnering on solutions when needed, sharing program details with partners.
11	Agency/Group/Organization Agency/Group/Organization Type	Clay County Public Health Services-Health Health Agency Agency - Emergency Management Other government - County Civic Leaders
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs COVID

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consulted with local county public health regarding emergency management services for resiliency. Consulted during the planning period on an ongoing basis via in-person meetings, emails, and virtual meetings. Meetings were held regularly to discuss overflow homeless shelter needs, covid quarantine needs for homeless individuals accessing the shelters, food supply needs, etc. Emergency management personnel from the City and County attended these meetings. The City of Moorhead and Clay County share concerns regarding mitigating the threats of natural hazards, especially as climate change poses to amplify them as low-to moderate-income residents are disproportionately impacted. The greatest natural hazard risks faced by Moorhead residents are: flooding, severe storms, strong winds, and droughts. Discussions took place in regard to the region's response to flooding and the FM Area Diversion progress and construction that is occurring. Outcomes included increased awareness of community emergency management needs and coordination of local resources. The City has some ongoing projects that are working to address needs identified.</p>
12	Agency/Group/Organization	FAMILY HEALTHCARE CENTER
	Agency/Group/Organization Type	Services-homeless Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Non- Housing Community Needs
	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	Email, and in person. Consulted to gain knowledge on their mobile clinic and what areas they serviced in the City of Moorhead. Their mobile clinic is currently providing dental care to Moorhead public schools for students who don't have access to dental care. The mobile clinic is also partnering with Moorhead Public Housing Agency to provide on-site vaccinations for low-income tenants. Outcome of consultation is to build relationships and identify needs.

13	Agency/Group/Organization	FARGO MOORHEAD METROPOLITAN COUNCIL OF GOVERNMENTS
	Agency/Group/Organization Type	Other government - Local Planning organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Email. To build relationship; identify needs. Currently they are doing a housing market needs study.
14	Agency/Group/Organization	Moorhead Public Schools
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Education
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Email, Outreach. Anticipated outcome to build relationship to better understand educational needs in Moorhead along with how the school district collaborates and works with children residing in homeless shelters. Moorhead public school added a new position in 2020 dedicated to work with students experiencing homelessness.
15	Agency/Group/Organization	Greater Minnesota Community Services
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services- Mental Health

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	consulted by email and over the phone. continue to build relationship and better understand the mental health issues and housing issues that homeless and low-income individuals face.
16	Agency/Group/Organization	City of Moorhead
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - Local
	What section of the Plan was addressed by Consultation?	Emergency Management/Resiliency
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted by email and in person discussions. Discussions with the City of Moorhead's Utilities Engineer for wastewater and storm water operations. Discussions took place with Andrea Crabtree, Engineer, and public works staff who manage the flood control system. Discussed flood prone areas, public land and water resources, and discussed emergency management agencies such as the Red Cross. Discussions with Andrea also included her working with Houston Engineering on conducting a study on climate change and resilience planning. The study will focus on "other" flood event that occurs in the City of Moorhead which is localized flooding due to heavy rainfall. The study looks at potential impacts of street flooding, sanitary sewer overload, and property damage. Anticipated outcome/areas or areas for improved coordination: to improve. departmental relationships and knowledge of community development needs and how that relates to emergency management.

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

The City of Moorhead consulted a well rounded list of agencies and organizations, and did not deliberately omit any from the process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	West Central Minnesota Continuum of Care	"Consistently facilitate the movement of individuals/families toward permanent housing and successful independent living." Moorhead plans to continue support of coordinated assessment, transportation opportunities (OUT), and fostering relationships/partnerships with service providers responding to homelessness daily. "Providing the housing and /or services needed to help individuals move into transitional and permanent housing". Moorhead plans to build or rehabilitate 15 rental housing units and does so through partnerships with area agencies (e.g., MPHA, CCHRA, CCRI). Moorhead also plans to rehabilitate or construct 40 affordable housing units and construct, including 5 Habitat for Humanity homes (or similar organization). "Promote access to and effective use of mainstream programs". Moorhead plans to continue support of coordinated assessment development, which will meet this goal.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2020-2022 Strategic Plan	Minnesota Housing Finance Agency	"We finance pre- and post-purchase counseling, education, coaching, and financial empowerment; mortgages and down payment/closing-cost assistance; and home improvement loans." Moorhead's strategy overlaps with its homebuyer education through the Lakes & Prairies Community Action Partnership. Education is approved by MHFA, allowing applicants to obtain loan products from MHFA, which are briefly discussed by City staff at each class. "Existing housing is typically the most affordable, and preserving it is more cost effective than building new. Moorhead's strategy overlaps with its Single-Family Rehabilitation program, which maintains and improves existing affordable homes. Through energy efficiency improvements, it also makes homes more affordable by reducing costs spent on utilities. Moorhead plans to build or rehabilitate 15 rental housing units and does so through partnerships with area agencies (e.g., MPHA, CCHRA, CCRI). "Strategic Priority: Prevent and End Homelessness. Moorhead plans to continue support of coordinated assessment, transportation opportunities (OUT), and fostering relationships/partnerships with service providers responding to homelessness daily.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

This section summarizes the consultation process with an introduction, a summary of the City's activities to enhance coordination between public and assisted housing providers and private governmental health, mental health, and service agencies, a summary of the coordination with the Continuum of Care and efforts to address the needs of homeless persons and persons at risk of homelessness, a list of organizations consulted, a summary of how the goals of the strategic plan overlap with plans of the Minnesota Housing Finance Agency and the West Central Minnesota Continuum of Care, and a description of cooperation and coordination with other public entities.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Stakeholder participation is vital to the City of Moorhead in identifying community development needs, reviewing the benchmarks for ongoing housing and community development programs. The City of Moorhead obtains citizen input through conversations with people, consulting with housing and service providers, and other arms of local government in an effort to capture Moorhead's community development needs.

As publicized through newspaper advertisement, on the City of Moorhead's website, along with email notifications to citizens who elected to receive notifications a public meeting was held on September 15, 2023. The meeting consisted of one City of Moorhead staff and one citizen. No comments were received. The 30-day comment period on the 2024 Annual Action Plan draft was from November 23, 2023 – December 23, 2023. The proposed action plan was made available on the City's website and at the public library. City staff also worked with local service agencies that service low-to-moderate income clientele in order to solicit input during the planning process. A public hearing was held on December 11, 2023. In order to accommodate disabled persons and non-English speakers, all advertisements included this language, "In advance of the public hearing, alternative formats of this information or accommodation for persons with disabilities or limited English proficiency will be made upon request (10 hours' notice is required). To make arrangements for services, call 218-299-5434; for TDD/Relay service dial 711."

Also taken into consideration for the 2024 Annual Action Plan was the in-depth citizen participation and consultation that took place during the creation of the Consolidated 2020-2024 Plan. Citizens were engaged in the planning by means of a community survey that was prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. See Appendices for survey. The survey results were compared alongside notes taken during conversations with local service providers/agencies (consultations) and statistical data provided by agencies or the US Census Bureau. The survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data. 335 people participated in the development of the Plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	There was one City of Moorhead staff and one citizen in attendance.	No comments were received.	All comments are accepted and considered in the development of the 2024 Action Plan for Housing and Community Development.	
2	Internet Outreach	Non-targeted/broad community	Meeting and public comment period e-notification through internet and social media.	None received	All comments are considered	
3	Newspaper Ad	Non-targeted/broad community	Public meeting and public comment period notification included in newspaper ad.	N/A	NA	
4	Public Hearing	Non-targeted/broad community	There were citizens in attendance, though there were no comments received at the public hearing.	None received	NA	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Copy of Draft made available at Moorhead Public Housing Apartment locations and the local library.	Minorities Persons with disabilities Residents of Public and Assisted Housing	No response.	No comments received.	N/A	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Community Development Block Grant funds must address one of three National Objectives; benefit low to moderate income individuals, prevention of slum and blight conditions (i.e., vacant buildings, code enforcement, and removal of unsafe structures), and to address urgent need that threatens the health, safety, and welfare of the community's residents. This section briefly summarizes anticipated resources for 2024 along with a short explanation of how federal funds will leverage additional resources (private, state, and local). The City of Moorhead anticipates a total of \$463,000 in combined resources to address the priority needs for the 2024 program year. This amount is comprised of CDBG award amounts and program income estimates.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	342,210	150,000	0	492,210	0	The City of Moorhead is in its fifth year of its 2020-2024 Consolidated Plan. Expected resources have been allocated for 2024 activities. Any additional or unforeseen program income will be allocated to Home Rehabilitation. Because these funding sources are subject to annual Congressional appropriations and potential changes in funding distribution formulas, the expected amount available for the remainder of the Con Plan, which includes program income estimations, is subject to change with availability of funding.

Table 5 - 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

CDBG funds for housing activities are regularly leveraged against and combined with state and federal resources managed by Minnesota Housing Finance Agency, including Start Up, Step Up, and Fix Up and Community Fix Up loans, Rehabilitation Loan/Emergency and Accessibility Loan Programs, Minnesota Housing Community Development, down payment and closing cost assistance loans, multi-family loans and programs, and

Foreclosure Prevention through Minnesota Homeownership Center. Public service activities have many sources of matching funds (public and private), including the State of Minnesota. Contributors for metropolitan activities and organizations (i.e., Lakes & Prairies Community Action Partnership -Homebuyer Education Program, Habitat for Humanity – acquisition for affordable housing, Fargo Moorhead Coalition to End Homelessness -transportation and coordinated assessment) include the State of North Dakota and City of Fargo, among several other private and public donors and foundations.

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

The City will consider the use of publicly owned land or other property located within the jurisdiction for the construction of affordable housing for low to moderate income households or to address blighted conditions. The City of Moorhead understands the risk of holding land for extended periods of time and takes this into consideration along with the advantages prior to utilizing publicly owned land

Discussion

CDBG Program Administration and activities designated as “Public Services” are subject to statutory expenditure limits. The Public Services limit is 15% of the grant plus prior year program income. The Program Administration limit is 20% of the grant plus current year program income. 2024 Program Administration funds may be used for startup planning and administrative costs of future grant years (24 CFR 570.200(g)(3)). Annual activity budgets will be within these limits. CDBG awards between 2024 and 2025 may be greater or less than what is projected.

- Reductions to estimated program income or grant award will first reduce the Acquisition activity. If the reduction exceeds the acquisition activity, the City may conduct a plan amendment in accordance with the City of Moorhead's Citizen Participation Plan.
- Revenue received that exceeds estimated program income or a grant award more than estimated will be applied to home rehabilitation loans, or the City may conduct a plan amendment in accordance with the City of Moorhead's Citizen Participation Plan.
- Funds allocated to home rehabilitation projects not underway by June 30 of the program year may be redirected to blight removal activities.
- Citizens Participation Plan requires a substantial amendment if fluctuations are greater than \$20,000 or more than 25% of an approved activity budget.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	AH1 Affordable Housing	2015	2019	Affordable Housing		Affordable Housing	CDBG: \$82,000	Rental units rehabilitated: 50 Household Housing Unit
2	AH2 Affordable Housing	2015	2019	Affordable Housing		Affordable Housing	CDBG: \$232,210	Homeowner Housing Added: 0 Household Housing Unit Homeowner Housing Rehabilitated: 6 Household Housing Unit
3	AH5 Affordable Housing	2015	2019	Affordable Housing		Affordable Housing	CDBG: \$0	Other: 20 Other
4	HL1 Homelessness	2015	2019	Affordable Housing Homelessness Services and Prevention		Affordable Housing Homelessness Services and Prevention	CDBG: \$0	Other: 1 Other
5	HL2 Homelessness	2015	2019	Homeless		Homelessness Services and Prevention	CDBG: \$15,200	Public service activities other than Low/Moderate Income Housing Benefit: 150 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	SN1 Non-Homeless Special Needs Services	2015	2019	Non-Homeless Special Needs		Non-Homeless Special Needs Services	CDBG: \$0	Other: 1 Other
7	NH2 Non-Housing Community Development Needs	2015	2019	Non-Housing Community Development		Non-Housing Community Development Needs	CDBG: \$16,700	Public service activities other than Low/Moderate Income Housing Benefit: 105 Persons Assisted
8	SN3-Non-Homeless Special Needs Services	2020	2024	Non-Homeless Special Needs		Non-Homeless Special Needs Services	CDBG: \$28,500	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
9	AH3 Affordable Housing	2020	2024	Affordable Housing		Affordable Housing	CDBG: \$25,000	Homeowner Housing Added

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	AH1 Affordable Housing
	Goal Description	Rehabilitate affordable rental housing units. Moorhead Public Housing Agency – CDBG funds will assist with sprinkler head on fire suppression system and replacement of fire location panel at Sharp View Apartments.

2	Goal Name	AH2 Affordable Housing
	Goal Description	<p>Rehabilitate or construct 35 affordable housing units for homeownership by 2024. CDBG resources will be used for rehabilitation activities; CDBG resources used for construction activities will be leveraged against funds from Minnesota Housing Finance Agency and/or Greater Minnesota Housing Fund, and energy efficiency funds from Moorhead Public Service. Annual goal is 7 units per year (3 to be made available to households earning not more than 60% MFI and 4 to be made available to households earning not more than 80% MFI).</p> <p>Single Family Home Rehabilitation</p>
3	Goal Name	AH5 Affordable Housing
	Goal Description	<p>Support and encourage the efforts of governmental and private agencies seeking to reduce the cost burden of low-income households through certificate and voucher programs by providing letters of support and technical assistance with background information upon request. While not within the City of Moorhead's control, it is hoped that the number of rental subsidies available in Moorhead increases by at least 20 per year, or 100 over the five-year period.</p>
4	Goal Name	HL1 Homelessness
	Goal Description	<p>Support the continuation and expansion of emergency, transitional and permanent supportive housing available to homeless persons in the community. While the City of Moorhead's CDBG allocation is not sufficient to provide primary support to construct housing units, it can serve as a leverage source to support applications to primary funding agencies and support.</p>
5	Goal Name	HL2 Homelessness
	Goal Description	<p>Support the initiatives of service providers to expand homeless prevention services including outreach, coordinated assessment, shelter services, transportation, and transitional housing through survey research, technical support, certificates of consistency for funding applications, transportation vouchers, and other means.</p> <p>Opportunities Under Transit - bus passes</p>
6	Goal Name	SN1 Non-Homeless Special Needs Services
	Goal Description	<p>Support initiatives of service providers to maintain and expand services, outreach, and assessment for special needs populations through technical support, certificates of consistency for funding applications, and other means.</p>

7	Goal Name	NH2 Non-Housing Community Development Needs
	Goal Description	<p>Partner to address the needs of low-income youth by providing positive recreational and developmental opportunities.</p> <p>Moorhead After School Park Program -25 youth/individuals</p> <p>Afro-American Development Association Youth Program - 80 youth and young adults</p>
8	Goal Name	SN3-Non-Homeless Special Needs Services
	Goal Description	Provide services to low-to moderate income homeowners that are elderly and/or disabled so they can safely access their homes.
9	Goal Name	AH3 Affordable Housing
	Goal Description	Construct affordable housing units for homeownership by 2024, specifically through partnership with Habitat for Humanity or other qualified non profit organization. CDBG resources will be used for land acquisition and or infrastructure costs associated with acquisition.

Projects

AP-35 Projects – 91.220(d)

Introduction

Activities are direct responses to the need's assessment and market analysis in the 5-Year Plan and ongoing consultations and citizen participation. Priority areas include affordable housing, homelessness, non-homeless special needs, and non-housing community development. The following chart provides descriptions and expenditures of 2024 activities.

The City undertakes multiple activities to Affirmatively Further Fair Housing such as supporting the Moorhead Human Rights Commission's education efforts, through the homebuyer education CDBG activity, and through support of organizations that provide Fair Housing services in the community.

Projects

#	Project Name
1	Home Rehabilitation Loan Program
2	Opportunities Under Transit
3	Moorhead Park Youth Programming
4	Youth Program-AADA
5	Capital Needs- MPHA
6	Program Administration
7	Snow Removal Assistance
8	Acquisition- Habitat

Table 7 - Project Information

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

Allocation priorities are a result of citizen participation, consultations with local service providers, statistical data, needs assessment, market analysis, and evaluation of past performance.

The City of Moorhead's highest priority for community development resources continues to be maintaining and creating affordable housing opportunity within the community. Both the US Census data and local needs assessment information contained within the 5-Year plan indicate a significant number of both low-income renter and homeowner households with high cost burdens and other housing problems. Moorhead's housing stock, while generally affordable, is aging, indicating a need for housing preservation activities and creation of additional new housing units. As population continues to grow, the City of Moorhead must be deliberate in its planning efforts to ensure affordable housing is part of development throughout the City. Obstacles to meeting underserved needs include resource

limitations, both the CDBG allocation and the resources of partner agencies and funders is not as high as it was in the past.

AP-38 Project Summary

Project Summary Information

1	Project Name	Home Rehabilitation Loan Program
	Target Area	
	Goals Supported	AH2 Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$232,210
	Description	City-wide rehabilitation loan program assisting owner-occupants of single-family homes whose income falls below 80% of area median income. Funds are provided on a loan basis up to \$20,000 provided sufficient home equity exists and up to an additional \$5,000 if needed to repair the home to standard condition. No interest accrues on the loan and the entire principal balance must be repaid upon sale, title transfer or owner vacancy of the property. Applications from interested individuals are accepted by the City on a first come, first served basis. The program is administered by the City of Moorhead. Includes program administration.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	City Wide
	Planned Activities	Rehabilitation of existing housing stock for low to moderate income households.
2	Project Name	Opportunities Under Transit
	Target Area	
	Goals Supported	HL2 Homelessness
	Needs Addressed	Homelessness Services and Prevention
	Funding	CDBG: \$15,200
	Description	Discounted bus pass voucher program for persons who are homeless or extremely low income (less than 30% median income) to provide transportation. The program can be accessed for monthly bus passes up to four times per year per participant. The program will be administered by Metro Area Transit. Include program administration.
	Target Date	12/31/2024

	Estimate the number and type of families that will benefit from the proposed activities	150 extremely low-income individuals
	Location Description	City Wide Transportation
	Planned Activities	Provide discounted bus pass voucher for persons who are homeless or extremely low-income.
3	Project Name	Moorhead Park Youth Programming
	Target Area	
	Goals Supported	NH2 Non-Housing Community Development Needs
	Needs Addressed	Non-Housing Community Development Needs
	Funding	CDBG: \$8,500
	Description	Recreation activity programming, meal program and/or activities for youth in low-income neighborhoods conducted by Moorhead Parks & Recreation Department. Participating youth range in age from 3-17 years, the predominant age of participants is under 12 years. Includes program administration.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	at least 25 youth/individuals will benefit from this program.
	Location Description	This activity will take place at the Village Green Park, 2601 Village Green Moorhead. This park location is in a low to moderate income census tract.
4	Planned Activities	Provide recreational programming and after school homework assistance, and snack for 25 youth.
	Project Name	Youth Program-AADA
	Target Area	
	Goals Supported	NH2 Non-Housing Community Development Needs
	Needs Addressed	Non-Homeless Special Needs Services
	Funding	CDBG: \$8,200

	Description	The Afro-American Development Association offers a Youth Program for those age 14-24. Their goal is to shape a positive future through discovering their unique talents and abilities by experiencing meaningful activities, education, building career awareness, and accessing valuable work experiences.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	80 youth ages 14-24 from low to moderate income households, predominatly New American households
	Location Description	1132 28 Ave S Moorhead Mn
	Planned Activities	
5	Project Name	Capital Needs- MPHA
	Target Area	
	Goals Supported	AH1 Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$82,000
	Description	CDBG funds will be used to assist Moorhead Public Housing Agency with rehabilitation work on their Highrise and Sharpview Apartments. Work will include replacement of sprinkler heads on the buildings fire suppression system to ensure the safety of their residents. The Highrise apartment has 104 units and Sharpview apartments has 47 units.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	MPHA's Sharpview contains 47 units of senior housing. All families residing in the units are low-to-moderate income households.
	Location Description	Sharpview 920 5th Ave S
	Planned Activities	CDBG funds will be used to assist Moorhead Public Housing Agency with rehabilitation work on their Sharpview Apartments. Work will include replacement of sprinkler heads on the buildings fire suppression system to ensure the safety of their residents. Sharpview apartments has 47 units.
	Project Name	Program Administration

6	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$92,600
	Description	Staff support for the planning, implementation, reporting and monitoring of CDBG resources.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	2024 Program Administration funds may be used for startup planning and administrative costs of future grant years (24 CFR 570.200(g)(3)
	Location Description	
	Planned Activities	Staff support for the planning, implementation, reporting and monitoring of CDBG resources
7	Project Name	Snow Removal Assistance
	Target Area	
	Goals Supported	SN3-Non-Homeless Special Needs Services
	Needs Addressed	Non-Homeless Special Needs Services
	Funding	CDBG: \$28,500
	Description	The City of Moorhead will assist homeowners who are elderly and/or disabled with snow removal services. CDBG funds will be used to pay a contractor the City hires to remove snow from public sidewalk abutting the home, driveway, and one walkway to a door for persons who are accepted into the program. Applicants will be prioritized on a first-come, first-served basis. Budget: \$28,500 (\$28,000 contract/\$500 Activity Administration)
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Benefit elderly and or disabled low to moderate income homeowners to safely access their homes by providing assistance with snow removal.
	Location Description	City Wide

	Planned Activities	Remove snow for elderly and or disabled homeowners who are low to moderate income and can not remove the snow themself, to safely access their home.
8	Project Name	Acquisition-Affordable Housing
	Target Area	
	Goals Supported	AH3 Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$25,000
	Description	Construct one single-family homes for affordable homeownership, specifically through partnership with Lake Agassiz Habitat for Humanity. CDBG resources will be used for acquisition of a lot to be used by Habitat to construct affordable home for household with income less than 80% of the median income.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	One family will benefit who are low-to-moderate income households
	Location Description	To be determined. Residential lot in Moorhead.
	Planned Activities	Acquire lots for the purposes of constructing affordable housing units for homeownership for households whose income falls below 80% of median income.

AP-50 Geographic Distribution – 91.220(f)

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

The public service activity, Moorhead Park Youth Programming, will take place in a Moorhead park where the location of the park is in a tract census area where more than 50% of that tract area has income at or below 80% of the area median income. This activity has \$8500 allocated to it which is 1.7% of the expected total amount available of \$492,210.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

To provide a suitable living environment for low to moderate income households, particularly those with children

Geographic area is City Wide for CDBG funding. The Geographic Distribution Table above is not editable as there are no HUD approved target areas in Moorhead.

Discussion

Single family rehabilitation often occurs in areas of the city where homes are deteriorating due to age and maintenance, though there are no geographic area requirements.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The most common housing need reported in Moorhead is a shortage of affordable housing stock. The existing housing stock does not fully meet the needs of the community, specifically low-income households. Data shows about 45% of Moorhead's households have income at or below 80% of the area median income. Affordable housing and income are directly connected. HUD explains, "Families who pay more than 30% of their income for housing are considered cost burdened and may have difficulty affording necessities such as food, clothing, transportation, and medical care." Over 41% of Moorhead households are experiencing housing cost burden greater than 30% of their income [2018 ACS DP04].

Based on the data and consultations, the populations or household types more affected than others by housing problems are low-income households including:

- Single person and single parent households
- People fleeing domestic violence
- People with a criminal history, poor rental history, no credit or poor credit
- Larger families
- People with mental health and/or chemical dependency issues
- Native Americans who represent 20% of the local adult homeless population (1.5% of the general population - 2019 ACS data)
- Black or African Americans who represent 19% of the local adult homeless population (6.2% of the general population - 2019 ACS data)
- People with a disability

One Year Goals for the Number of Households to be Supported	
Homeless	150
Non-Homeless	47
Special-Needs	0
Total	197

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	53
Acquisition of Existing Units	0

One Year Goals for the Number of Households Supported Through	
Total	53

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The one-year goals listed above are associated with 2024 activities, but the completion and reporting of those activities will happen span over two years due to construction schedules. 2024 activities that attribute to affordable housing, in accordance with HUD's definition of affordable housing per 24 CFR 92.252 and 24 CFR 92.254, is as follows:

- Home Rehab Program, goal of rehabilitating six homes for qualifying homeowners
- Rehabilitation to Moorhead Public Housing Sharp View Apartments, 47 units

AP-60 Public Housing – 91.220(h)

Introduction

Moorhead Public Housing Agency (MPHA) reports a total of 198 housing units in Moorhead. The majority (151) are under the HUD's Public Housing program. MPHA continues to rent these units under the Moorhead Affordable Housing LLC to people who are low income. A total of 256 people are living in MPHA properties, 60 of those are children. MPHA continues to manage a waiting list for public housing and scattered site properties. Currently, there are 257 households are on the waiting list for these units.

In September of 2021, MPHA partnered with the City of Moorhead to acquire 34 units known as Maple Court Townhomes. MPHA purchased half of the units and the City of Moorhead purchased the other half. These are Low Income Housing Tax Credit units.

Clay County Housing and Redevelopment Authority (CCHRA) reported their housing voucher waiting list has been closed to the general population since 2010 and is only opened for specific preference categories at certain times. There are 96 households on the waitlist for their Fieldcrest Townhomes development. Fieldcrest is currently undergoing a \$6million dollar renovation so the wait list is currently closed. Most of their vouchers are based in Moorhead where there are 187 Mainstream vouchers and 757 Housing Choice Vouchers. Of the 757 funded Housing Choice Vouchers, 40 are VASH (veterans) and 187 are Mainstream vouchers, 30 Tenant Protection Vouchers, 1 Foster Youth to Independent vouchers, 15 Emergency Housing Vouchers and 474 regular vouchers (40 of the 474 are Tenant Protection, there are 29 project-based vouchers and 16 are being used for homeownership).

Actions planned during the next year to address the needs to public housing

Provide technical assistance as needed (i.e., environmental reviews), construct or rehabilitate public housing units. It is planned in 2024 to address the need of fire sprinkler heads at their SharpView Apartments.

Support and encourage Moorhead Public Housing Agency efforts to reduce the cost burden of low-income households through certificate and voucher programs by providing letters of support and other technical assistance.

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

Moorhead Public Housing Agency (MPHA) was awarded a three-year renewal of its ROSS grant from HUD in April of 2021. ROSS stands for Resident Opportunity and Self Sufficiency. This federal grant funds assist residents with connecting to services and supports within the Fargo-Moorhead community. The majority of MPHA residents have a disability or are elderly and many are extremely low-income. Information on what services are out there and how to access them can be challenging to

navigate. The ROSS Coordinator position assists residents to identify goals (of which homeownership may be one) and connect to services to increase health and other quality of life outcomes.

River View Heights is a 14 Story High Rise with 104 units. In 2018 a community garden was created on land near the High Rise owned by MPHA. The River View Garden provides residents with access to nutritious food, opportunities to connect with others in the community, and an outdoor opportunity to garden which is proven beneficial to those struggling with mental illness. MPHA also facilitates weekly food distribution from Great Plains Food Bank at both apartment locations.

MPHA also collaborates and works with a number of organizations to bring more individualized services to residents. Examples include home health care, mental health supports, case management, Hospice, Meals on Wheels, NAPS for seniors, employment services and transportation. MPHA collaborates with agencies such as Lakeland Mental Health, CCRI, Sanford home health, Summit Guidance, Valley Senior Services, Lakes and Prairies CAPLP (homebuyer education provider), Hospice of the Red River Valley, Clay County Social Services, West Central Initiative, Metro Senior Rides, Essentia home health, and many more. In addition, MPHA worked to provide education and assistance to residents about how to prevent the spread of COVID 19.

MPHA staff are committed to the mission of the organization which includes promoting positive outcomes for the residents and the community we serve. Staff participate and serve on a number of boards and committees that are dedicated to this to advocate for the population that resides in public housing. Examples include: 2020 Census Complete Count Committee, Successful Outcomes for Tenants and Landlords (SOFTL), Regional Adult Mental Health Initiative Steering Committee, West Central Continuum of Care Board, Program Coordination Committee, Lakes & Prairies CAPLP Housing Advisory Board and Consumer Action Board. The Consumer Action Board is the newest group and consists of individuals who are living in public housing, supportive housing, homeless shelters, and in the community on housing supports. There is currently one resident of MPHA that serves on this board. The individuals are able to share their journeys to find and maintain housing and provide ideas on how current systems could be improved to better serve people.

MPHA is governed by 5 board members, 1 of which is specifically designated for a resident of public housing. MPHA staff also meets regularly with residents to obtain input on capital improvement projects and other issues important to residents

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

The Moorhead PHA is not 'troubled'.

Discussion

There are hundreds of people on the waiting lists for housing vouchers. There are also some vouchers

for use in private sector housing which are not being used because of high rental rates, property owners/managers who will not accept vouchers, and/or because of decreased voucher funding. While not within the City of Moorhead's control, it is hoped that the number of rental subsidies available in Moorhead increases by at least 20 per year, or 100 over the five-year period. Moorhead will continue to take actions to address the needs of public housing as described in this section.

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

Introduction

The FM Coalition to End Homelessness released a report titled *State of Homelessness in Fargo-Moorhead Metro* on June 28, 2022. The report details a significant number of homeless adults and their children in Fargo, ND and Moorhead, MN, indicating that homelessness is still a major issue in the Fargo Moorhead community. Fargo, Moorhead, and West Fargo Homeless School Liaisons began tracking data on the total youth experiencing homelessness in the school systems. In the 2021-2022 school year, there was an estimate of 650 children from pre-K-12th grade experiencing homelessness. Additionally, 21% of these youth were also parents. According to data available in HMIS, in 2021, 1,156 individuals made up family households led by an adult who received homeless services either in Cass County, ND, or Clay County, MN. These 1,156 make up 328 unique family units. With 63% of those served in these households are children under age 18.

According to data available in the Homeless Management Information System (HMIS), in 2021, 3,554 individuals received homeless services either in Cass County, ND, or Clay County, MN. This is an increase of 424 people served from the previous year. Clay county served an additional 452 individuals and Cass County served 28 less than in 2020.

There are various reasons why people leave their housing and are unable to secure different housing. Individuals experiencing homelessness in our community face many barriers to sustainability, specifically when it comes to gaining and maintaining livable-wage employment and safe, stable housing. According to the *State of Homelessness* report, in Clay County the top contributor to respondents' housing crisis was not being able to afford their rent (57%). Poor credit was the second-highest contributor to their current housing crisis (41%). Mental health symptoms, criminal history barriers, and substance use were also noted as causes to a current housing crisis.

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

Continued support and funding of the Coordinated Assessment and Referral and Evaluation System (CARES) and Opportunities Under Transit (OUT). The West Central Coc's annual Point-in-Time(PIT) Count is one of the primary data pieces that the City uses to identify the numbers and needs of people experiencing homelessness in Moorhead. The PIT count involves outreach by several partners to survey all individuals who are sheltered and unsheltered on one given night. The City of Moorhead will

continue to meet with the CoC coordinator quarterly and review data and discuss needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

Fargo and Moorhead homeless shelters utilize a single-entry diversion through a homeless hotline (in partnership with First Link, the 211-phone hotline provider). This helps divert individuals from entry into the homeless system, as well as link them to appropriate mainstream services. Coordinated assessment links individuals to transitional housing based on their VI-SPDAT score.

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

The Coordinated Access, Referral, Entry & Stabilization (CARES) System is a partnership of agencies collecting and sharing information in CARES approved databases to provide a more coordinated homeless response system. The goal of CARES is to provide individuals with the right information about services to help them successfully obtain and retain housing based on a Housing First methodology. All projects must conduct an annual Housing First assessment which is reviewed by the West Central Minnesota CoC Performance Evaluation Committee. CARES utilize the SPDAT assessments for prioritization and linkage to housing and to promote housing stabilization once housed. Linkage (not just referrals) to mainstream resources is essential to stabilization as well.

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.

The West Central Minnesota Continuum of Care (CoC) participates in statewide prison discharge fairs and partners with regional mental health and family collaborative groups to assure practices and policies are in place and being utilized to avoid discharging someone into homelessness. The local medical facilities partner with local shelters to provide onsite shelter nursing staff which has significantly decreased discharges from healthcare facilities into shelters and helped to advocate for admittance to other more supportive environments (e.g., foster care, respite care, nursing homes, halfway house), particularly for those who need more intensive outpatient medical or mental healthcare. There are a

number of transitional housing units in the community that offer or connect their residents to support programs, particularly those returning from mental health institutions. Caseworkers often help clients find housing if they are homeless and then provide regular home visits.

All of the following permanent supportive housing units require that residents have a disability (mental, physical, and developmental). Clay County HRA has a 24-unit permanent supportive housing building called Gateway Gardens and vouchers for private market units currently under lease in Moorhead for permanent supportive housing. Clay County HRA also is a project manager for a MN Department of Human Services grant that provides case management for those exiting institutions. In 2018, Churches United completed construction of 42 units of permanent supportive housing on a 10-acre parcel of land zoned for multi-use in Moorhead, MN for individuals and families who are determined eligible based on the Coordinated Assessment SPDAT tool. The units accommodate 17 singles in efficiencies and one-bedroom apartments, and 24 families in two, three, and four-bedroom apartments. Common areas include an indoor active play area, an adult exercise room, and a community/family room with a kitchen for classes, community meals, and activities. Support services include two full-time case managers (one from Churches United, and another from collaborating service providers such as Lakes and Prairies), a part-time nurse, and a youth worker.

Clay County Social Services coordinates and manages special service needs for persons with physical and mental disabilities, frail elderly, and persons with mental illness, including those returning from mental and physical health institutions. Several contracted agencies provide care attendants and support services. There are 113 licensed adult foster care sites in Moorhead for people with developmental disabilities, adults with mental illness, adults with chemical dependency, and elderly persons in Moorhead, and one residential facility for adults with mental illness. There are 69 Home and Community Based Services offering a community residential setting. There are 12 assisted living facilities in Moorhead that provide housing with customized living services for elderly and disabled who are at risk of nursing facility placement. Several other apartment complexes in Moorhead also provide assisted living services. There are two residential treatment facilities that provide housing for adults with chemical dependency issues and one residential facility for adults with mental illness. Other in-home services funded by Clay County include case management for several people with serious mental illness.

There are no housing units in Moorhead specifically designated to serve persons with HIV/AIDS and their families. However, agencies in the community may serve persons with AIDS within existing program offerings.

Discussion

City of Moorhead will continue its work with the CoC, be a part of the CARES system collaborative meetings where information and data are discussed in regards to homelessness in the City of Moorhead. Collaboration between all service providers in the City of Moorhead and making these services more accessible to the homeless population is key to the solutions to end homelessness in

Moorhead. The City of Moorhead will continue its support of these agencies by being a collaborative partner and assist in the process to end homelessness.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Barriers to affordable housing were determined through citizen participation, the Moorhead Community Survey, and consults with area agencies. Common barriers in Moorhead include:

- High rental rates
- Available units to match household size (Clay County HRA report 1-bedroom and 4-bedroom units are sought)
- Poor or no credit history
- Poor rental history
- Criminal background
- Tenant/landlord disputes and evictions

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

While striving to maintain neighborhood livability and safety, the City of Moorhead will continue to work on reducing barriers to affordable housing. Some of the ways the City has done this in the past and continues to do are listed below:

- Financing and participating in homebuyer education
- Securing down payment and closing cost assistance programs for local lenders through state program financing
- Land contributions to Habitat for Humanity, Access of the Red River Valley, and Creative Care for Reaching Independence
- Investment partnerships in new and renovated rental and owner-occupied housing developments
- Subdivision provisions allowing modest lot sizes (40-foot width)
- Tax increment financing for affordable housing development

Moorhead's housing costs are modest in comparison to state and national costs; however, as in other communities, this does not mean housing is affordable to lower income households in this community. More affordable housing stock, both rental and ownership, is needed and must be encouraged through public and private partnerships. Given the age of Moorhead's housing stock,

preservation activities must continue.

Land use controls as included within the Comprehensive Plan, Zoning Ordinance, and Subdivision Ordinance, do not contain regulations that constitute barriers to affordability. Fees are set at a level to cover the cost of providing oversight in the construction and improvement of quality housing units. Moorhead does not impose growth limits, but manages growth to maximize the availability of public infrastructure.

Public infrastructure installation is a significant cost to the creation of new housing at all price levels, but Moorhead and other cities in the metropolitan area do share risk by financing infrastructure in the form of special assessments and amortize the costs over time.

Discussion:

The City of Moorhead supports affordable housing development efforts. Barriers to affordable housing are well understood, though difficult to address. The actions that are planned to address barriers are listed in this section. More affordable housing opportunities mean less people experiencing homelessness and ultimately, people's quality of life and feeling of safety are influenced by the creation of more affordable housing. Partnerships and strong relationships with local agencies and developers to build and promote affordable housing is a priority for Moorhead.

AP-85 Other Actions – 91.220(k)

Introduction:

This section summarizes actions planned to address obstacles to meet underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

The City of Moorhead will foster and support ongoing relationships with local service providers and area agencies as they are the primary solution to meeting underserved needs of Moorhead. Partnerships and collaboration will occur when necessary to meet the needs of the community.

Actions planned to foster and maintain affordable housing

The City of Moorhead will foster and maintain affordable housing by ongoing operation of the Home Rehabilitation Loan Program and by supporting ongoing relationships with agencies such as Habitat for Humanity, Access of the Red River Valley, Creative Care for Reaching Independence, Clay County HRA, MPHA, Cass Clay Community Land Trust, and Churches United for the Homeless as they move forward with their plans to add to the affordable housing stock in Moorhead. The CoC has provided various trainings on housing stability including: housing case management, working with landlords, Housing First, Low Barrier, Harm Reduction, and Motivational Interviewing. The CoC works with MN Housing, supportive service partners and developers in creation of new MN Housing Super RFP projects.

Actions planned to reduce lead-based paint hazards

The City of Moorhead continues to implement HUD's Lead-Safe Housing regulations as established in 1999. All assisted tenants and owners living in pre-1978 construction housing units are notified of the dangers of lead-based paint and receive the required EPA brochures. Lead risk assessments are conducted on all pre-1978 construction housing units receiving assistance under CDBG rehabilitation programs. Lead-safe work practices are followed for lead-based paint removal and/or stabilization on all units in which lead-based paint is detected in accordance with EPA/HUD and Minnesota Department of Health. Approximately 6-10 homes are rehabilitated each year and many have lead based paint; lead safe work practices are used during rehabilitation. Older housing units have been demolished over time, which also reduces the number of homes with lead based paint and potential hazards. Taking precautions associated with lead safe work practices and understanding HUD's Lead-Safe Housing regulations reduce the chances for lead poisoning and hazards. These actions are written into the

rehabilitation program guidelines and are referenced for other activities.

Actions planned to reduce the number of poverty-level families

The City of Moorhead will support business growth and related job opportunities, transportation programming, and affordable housing projects throughout Moorhead. The primary way to reduce the number of poverty-level families is to keep unemployment rates low if possible and provide more affordable housing and public transit designed for its users. Ongoing collaboration with local service providers and area agencies is also important due to the complexity of poverty and the level and variety of services that are offered by Moorhead's local service providers. The CoC also established an Employment & Income Committee to support supportive housing programs in achieving improved income outcomes.

Actions planned to develop institutional structure

The City of Moorhead Administration Department is the lead agency in implementation of the Consolidated Plan. Other departments within the City government implement CDBG activities, including Parks and Recreation and Metro Area Transit. Community partners directly funded through CDBG are Lakes and Prairies Community Action Partnership, the Afro-American Development Association and the Boys & Girls Club of the Red River Valley. However, numerous other community organizations, businesses, and churches are directly involved in addressing the housing and community development needs of Moorhead, particularly related to emergency shelter, homeless prevention services, affordable home production and lending, education, employment, health care, transportation, childcare, counseling, and social services.

The strength of the institutional structure overall is the wide variety of organizations and collaborative networks addressing housing and community development issues in Moorhead and the Fargo-Moorhead metropolitan community. Of particular strength is the communication between homeless services providers through an active Fargo-Moorhead Coalition to End Homelessness. Churches United for the Homeless, Moorhead's largest emergency shelter, is a partnership of 58 faith congregations that work together to address the needs of homeless persons.

The City of Moorhead works to achieve strengthened communication in other housing and community development activities through an asset building, solution-based Neighborhood Services Division, which crosses existing City departmental lines and increase outreach to private financial and business sectors, and communication with residents.

The Mayor and Moorhead City Council are responsible for appointments to the Moorhead Public Housing Agency Board of Directors and the employment of the Executive Director. MPHA services contracting, other employment decisions, and procurement are handled independently of the City of

Moorhead. The City of Moorhead conducts environmental reviews for the MPHA.

The City of Moorhead will continue to communicate with MPHA, Clay County Housing and Redevelopment Authority, and other community organizations, sharing existing needs assessment data and working together to address emerging community needs and assets.

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

Ongoing relationships and partnerships where necessary.

Discussion:

All of the actions discussed in this section are described in detail the strategic plan section of this Consolidated Plan.

Program Specific Requirements

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

Introduction:

All estimated program income to be received before the start of the next program year has been programmed in 2024 and is required to be spent prior to entitlement funds. Moorhead has no section 108 loans, urban renewal settlements, or float funded activities. There are no urgent need activities in Moorhead.

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%

The 2024 Action Plan is designated as year 5 of a 5-year overall benefit period.

Attachments

Citizen Participation Comments

City of Moorhead
Community Development Block Grant
Citizen Participation Plan

Purpose

The City of Moorhead encourages citizen participation in all aspects of government, and particularly through its Community Development Block Grant process. The purpose of the Citizen Participation Plan is to set forth the City of Moorhead's procedure for citizen participation. This Plan applies to the City's use of U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) funds. The Citizen Participation Plan provides the steps to be taken to assure that citizens have an opportunity to participate and contribute ideas in the development of CDBG related-items/publication. The Citizen Participation Plan was drafted in accordance with Sections 91.100, 91.105, and 91.505.

What Is Community Development?

Community Development is a practice involving research, evaluation, collaboration, and strategic planning, mostly associated with affordable housing, homelessness, unemployment, transportation, and community resources and assets (e.g., social, environmental, natural, political, cultural, financial, built, and human capital, etc.). The City of Moorhead employs a Community Development Program Administrator who is responsible for the development of its Department of Housing and Urban Development (HUD) grant. The City Council maintains final approval of annual and consolidated plans and budgets.

Community Development Block Grant (CDBG):

The goal of the CDBG program is to develop viable urban communities by providing decent housing and suitable living environments, as well as expanding economic opportunities for low and moderate-income persons. It is a program designed to be flexible and tailored to community development needs and priorities. At least 70% of CDBG funds over a period of three years must be used to benefit people with low and moderate incomes. This does not include planning and administrative costs, but does include program income. Eligible activities under CDBG include, but are not limited to:

- Acquisition of real property
- Demolition
- Rehabilitation of residential and non-residential structures
- Public services
- Activities relating to energy conservation and renewable energy resources

Economic development and job creation/retention activities

Accessibility

Meetings and Public Hearings: All public hearings are advertised and published in the official newspaper of the City at least ten days prior to the hearing date. Meetings are held in fully accessible locations and media City services and auxiliary aids are offered to those with mobility, vision, or hearing impairments. Translation services are also available upon request by non-English speaking persons. Moorhead City Council meetings are public hearings held on regular scheduled dates each month. CDBG hearing notices are also posted to the City's website, sent to newsletter subscribers, and forwarded to the Moorhead Public Housing Agency and Moorhead Public Library for posting on bulletin boards and in elevators of public housing facilities.

In an effort to reach out to low- and moderate-income households and neighborhoods, the City of Moorhead invites participation by local housing and supportive service providers within the City to participate in and provide information for the Consolidated Plan by direct mail to these agencies and interested constituents.

All publications invite review and comments by interested persons by phone, in writing, or at public hearings and meetings.

Information Availability to the Public: Upon request, non-privacy protected information with regard to CDBG programs and other City activities are provided at no cost to any person requesting the information. Files are maintained for a minimum of five years regarding CDBG projects and expenditures and are available for review in the Department of Governmental Affairs office at Moorhead City Hall during regular business hours.

Technical Assistance: The City of Moorhead Department of Governmental Affairs' staff is willing to provide information and technical assistance to persons or entities wishing to develop proposals for housing and community development, grant funding to HJD, Minnesota Housing Finance Agency, City of Moorhead program offerings, and others as would benefit the community.

Public hearings regarding CDBG funding will be held at the following points during the program year:

- Development of the Consolidated Annual Performance and Evaluation Report
- Prior to developing the Consolidated Plan
- During the public comment period prior to submission of the Consolidated Plan
- Substantial Amendments to the Consolidated Plan or Annual Action Plan

The meetings are held at the Community Center or other community locations, which are fully accessible to persons with disabilities and are published in the official newspaper of the City, printed on the Moorhead City Council meeting agenda, posted on the City of Moorhead website, via e-Notification subscribers, listed on Moorhead Cable Access Television meeting announcements, and forwarded to the Moorhead Public Housing Agency and Moorhead Public Library for posting on bulletin boards and in elevators of public housing facilities. Meetings are scheduled at a variety of times to be convenient to the public. Interpreter services will be provided by the City of Moorhead when a significant number of limited English speaking residents are anticipated to attend.

Publication of the Consolidated and Annual Action Plan:

The City of Moorhead publishes a summary of its Consolidated Plan, including the anticipated amount of assistance expected to be available, activities to be undertaken, and the amount of funds that will benefit low and moderate income persons, so that citizens have an opportunity to review the plan and provide comments for at least 30 days prior to City Council approval. Copies of the Consolidated Plan are posted to the City's website, available for review at the Moorhead Public Library and the Moorhead Department of Governmental Affairs' office, and mailed to all citizens who request them at no cost. Alternative formats of the Consolidated Plan, this Citizen Participation Plan, and related publications will be made accessible in person with disabilities upon request.

Consolidated Annual Performance and Evaluation Report (CAPER):

The CAPER will be completed by the City of Moorhead each program year and an opportunity for review will be made known through newspaper publication of a 15 day comment period. A community meeting will be held during the comment period. Copies of the Performance Report will be available for review at the Moorhead Public Library and the Moorhead Department of Governmental Affairs' office and mailed, at no cost, to all citizens who request them.

Amendments to the Consolidated Plan or Annual Action Plan:

Substantial Amendment:

An amendment is considered substantial when:

- Changes in the use of CDBG funds from one eligible activity to another are made
- Changes to the greater of \$20,000 or 25% of the activity budget
- A deletion of an activity or project contained in the CIP or AAP occurs

- An addition of an activity or project not described in the Consolidated Plan or AAP occurs
- Major changes in the purpose, scope, location, or beneficiaries of an activity are made

Public Comment: The proposed substantial amendment shall be made publicly available for a public comment period of no less than thirty (30) days unless otherwise prescribed by HUD.

Public Notice: In the event of a substantial amendment, citizens will be notified through publication of a description of the amendment in the official newspaper of the City and e-Notification to subscribers 30 days prior to enacting the change. The notification will encourage citizen participation through a public hearing prior to submission of the amendment to HUD.

Response to Citizen Comments

Comments regarding the Consolidated Plan, amendments to the Plan, and performance reports are forwarded to the Moorhead City Council and subsequently to HUD. The City of Moorhead responds to written citizen complaints and grievances within 15 days of receipt. A summary of citizen comments is provided to HUD with submissions of plans, reports, and amendments.

Displacement

The City of Moorhead will minimize displacement of persons resulting from its CDBG program activities and will follow the Uniform Relocation Act standards in the event of displacement resulting from its CDBG program activities. Details of any project that requires displacement will be published for comment at least 10 days prior to project approval.

Minor Amendment

Any changes to the Consolidated Plan or the Annual Action Plan not meeting the criteria described in the Substantial Amendment section above will be considered a minor amendment or revision. Such changes will not be published or subject to public participation process nor will it require approval from the City Council.

Tanya Kunza

From: City of Moorhead <noreply@cityofmoorhead.com>
Sent: Monday, September 11, 2023 11:16 AM
To: Tanya Kunza
Subject: CDBG Public Meeting for 2024 Action Plan Development

CDBG Public Meeting for 2024 Action Plan Development
Community Development Block Grant (CDBG) Program

- **Date:** 09/15/2023 12:00 pm - 1:00 pm
- **Location:** Hjemkomst Center Oak Room
201 1st Ave N
Moorhead, Minnesota 56560

Moorhead Community Development Block Grant
Public Meeting Notice
September 15, 2023

The City of Moorhead will soon be preparing its 2024 Annual Action Plan for Housing and Community Development. This plan is used to allocate Community Development Block Grant (CDBG) funds, which are provided by the U. S. Department of Housing and Urban Development (HUD) to promote affordable housing and economic opportunities for low-to-moderate income persons. The year 2024 will be Year 5 of a 5-year Consolidated Plan (2020-2024) that sets strategies and goals for CDBG resources. The 2020 Con Plan - Final, and the 2023 Action Plan can be referenced for background information. The City of Moorhead will hold a public meeting to discuss community needs before publishing a draft 2024 Action Plan.

Friday September 15, 2023 @ 12pm
Hjemkomst Center, Oak Room, 201 1 Ave N, Moorhead

The Hjemkomst Center is accessible for persons with mobility impairments. Prior to the meeting, alternative formats of this information or accommodation for persons with disabilities will be made upon request (10 hours' notice is required). To make arrangements for services, call 218.299.5375; for TDD/Relay service dial 711.

You are welcome to attend the meeting. Comments, ideas, or concerns regarding housing and community development may also be shared at cityofmoorhead.com/cdbgcomments.

Additional opportunities for input: It is anticipated that a draft 2024 Action Plan will be posted online October 27, 2023 - November 25, 2023 for a 30-day comment period, with a public hearing at the Moorhead City Council meeting on November 13, 2023. The Mayor and Council are scheduled to consider approval of the Action Plan on November 27, 2023. The plan will be submitted to HUD upon completion. Check cityofmoorhead.com, search CDBG for schedule and the draft plan (once developed).

FM Extra
100 5th Ave S Suite 120
PO Box 1026
Moorhead, MN 56561

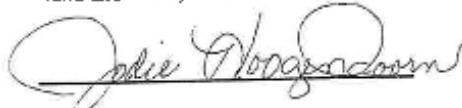
State of Minnesota

Clay County

I, Lisa Miller, duly sworn on my oath, do say that in the FM Extra, a newspaper issued weekly, published in Moorhead, in said County of Clay, the aforesaid notice was inserted and published in said newspaper on the issue of 09-06-13 for the reasonable fee for advertising, and no fee is \$23.65.



State of Iowa
County of Lyon
Subscribed in my presence and sworn before me 3940873. Given under my hand and Notary Seal.



Notary Public

Jodie Huoogendorn
State: Iowa
County: Lyon
Expiration Date: January 17, 2026
Commission No.: 152759

COBG resources. The 5-year plan may be viewed on the City's website, cityofmoorhead.com (search for "City of Moorhead 5-Year Plan"). The City of Moorhead will hold a public meeting to discuss community needs before publishing a draft 2024 Action Plan on Friday September 15, 2023 @ Noon at the Hemlock Center, 100 Brown Avenue, 100 Brown Avenue, 201, I Ave N, Moorhead. The Hemlock Center's address is 201 I Ave N, Moorhead. The City of Moorhead will soon be presenting its 2024 Annual Action Plan for Housing and Community Development. This plan is used to allocate Community Development Block Grant (CDBG) funds, which are provided by the U.S. Department of Housing and Urban Development (HUD) to promote affordable housing and economic opportunities for low-to-moderate income persons. The year 2024 will be Year 5 of a 5-year Consolidated Plan (2020-2024) that sets strategies and goals for

existing, continuing, ideas or concerns regarding housing and community development may also be shared at cityofmoorhead.com (search for "City of Moorhead 5-Year Plan").

Additional opportunities for input: It is anticipated that a draft 2024 Action Plan will be posted online October 27, 2023 - November 25, 2023, for a 30-day comment period. With a public hearing at the Moorhead City Council meeting on November 13, 2023. The Mayor and Council are scheduled to consider approval of the Action Plan on November 27, 2023. The plan will be submitted to HUD upon completion. Check cityofmoorhead.com for schedule and the draft plan once developed.

F036.4

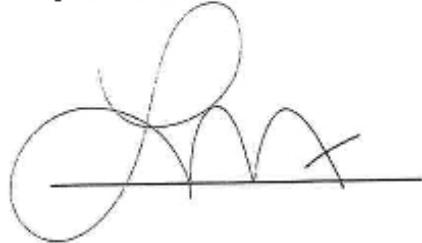
You are welcome to attend the

FM Extra
810 4th Ave S Suite 120
PO Box 1026
Moorhead, MN 56561

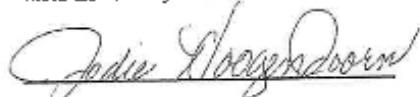
State of Minnesota

Clay County

J. Lisa M. Lee, duly sworn on my oath,
do say that in the FM Extra, a newspaper
issued weekly, published at Moorhead,
in said County of Clay, the aforesaid
notice was inserted and published in said
newspaper in the issue of 1/22/23 for
the reasonable fee for publishing said
notice is \$40.66.



State of Iowa
County of Lyon
Subscribed to my presence and sworn
before me 11/27/23. Given under my
hand and Notary Seal.



Notary Public

Jodie Hoogendoorn
State : Iowa
County : Lyon
Expiration Date : January 17, 2026
Commission No. : 152759

Annual Action Plan 2024

The Wayback Machine - <http://web.archive.org/web/20240301083134/https://www.cityofmoorhead.com/dep...>

Snapshot of CDBG Web page on March 1 - 2024



Our Services

The City of Moorhead receives CDBG resources annually from the United States Department of Housing and Urban Development (HUD) to assist in the development of "viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons." - CDBG

Amendments and 30-Day Public Comment

- [2024 Action Plan Draft](#)
- [2022 Action Plan Amendment](#)
- [2023 Action Plan Amendment](#)

The 30-day public comment period is from Nov. 23, 2023 to Dec. 23, 2023. There are three options to provide public comment:

- Email: tanya.kunza@moorheadmn.gov
- Call: 218.299.5375
- Write: City of Moorhead, attn: Tanya Kunza, 500 Center Ave, Moorhead, MN 56560

CDBG Strategic & Annual Plans

- [2020-2021 5 Year Plan](#)
- [2021 Action Plan](#)
- [2022 Action Plan](#)
- [2023 Action Plan](#)

Performance Reports & Reviews

- [2022 Consolidated Annual Performance Evaluation & Review \(CAPER\)](#)
- [2021 Consolidated Annual Performance Evaluation & Review \(CAPER\)](#)
- [2020 Consolidated Annual Performance Evaluation & Review \(CAPER\)](#)

Citizen Participation

- [Citizen Participation Plan](#)

The City of Moorhead encourages citizen participation by providing people with opportunities to review and comment on activities. Draft plans and reports will be posted on this website during comment periods. Notifications for meetings and comment periods are also published in the local newspaper, allowing for timely comment and response.

Furthering Fair Housing

The City of Moorhead is required to submit annual certification with its action plan certifying that it will affirmatively further fair housing. View the [Assessment of Fair Housing](#).

Public Comment Summary

September 15, 2023

Public Meeting, No comments received.

November 23, 2023 – December 23, 2023.

30 day public comment period. No comments were received during this time

Public Hearing December 11, 2023

Public Hearing. Modification was proposed and discussed at the public hearing; \$25,000 allocated to Habitat for Humanity for costs associated with land acquisition for affordable housing construction, and an associated reduction to Single Family Home Rehabilitation funding by \$25,000. No comments were received during the public hearing.

Good Evening Mayor, City Council

Hello I am Tanya Kunza, the Community Development Program Administrator. As noted in your materials, tonight is a public hearing only as part of our citizen participation plan regarding Community Development Block Grant. Several projects are proposed with funds that are currently available to be reprogrammed and using anticipated funds expected in 2024.

There is no Council action requested this evening. Action will be requested at the January 8 City Council meeting. The public comment period will end on December 23; no comments have been received so far. The draft annual action plan for 2024 has a total of \$463,000 anticipated resources available, including \$313,000 in grant funds and \$150,000 in program income. CDBG allows 20% of funds for program administration and 15% for public services. The caps for both are reflected in the proposed plan.

An additional request consistent with our action plan has been received since the advertisement in the FM Extra on November 23, 2023. Lake Agassiz Habitat for Humanity has been offered to purchase 5 lots in various locations in which they want to acquire at below-market cost for affordable home construction. While some funds are available within existing resources, an adjustment of \$25,000 to the Home Rehabilitation project would allow for the acquisition of all 5 lots.

Additionally, the City of Moorhead has received development inquiries into 1014 and 1016 19 Street South, south of Rumkey Park. Jasmin child care, is one of the development inquiries. Jasmin has consulted with the current property owner, Cass Clay Community Land Trust. The Land Trust is actively marketing the property. If the City purchases the property for a CDBG eligible use, the property can be used as "leverage" within grant applications for the construction. It could also be used as an extension of Rumkey Park.

Comments on the 2024 draft plan and proposed amendments will be accepted thru December 24, 2023. Comments can be made over the phone, by email, or by submitting comments thru the website. All of this information is available on website cityofmoorhead.com search community development block grant.

Once you've taken any public comments, please let me know if you have any questions. Thank you.

Agenda Item {{section.number}}.{{term.number}}.



City Council Communication

December 11, 2023

SUBJECT:

Public Hearing on the Community Development Block Grant 2024 Annual Action Plan and Amendments to the 2022 and 2023 Annual Action Plans

RECOMMENDATION:

This is a public hearing only. The Mayor and City Council are asked to receive public comments on the draft 2024 Annual Action Plan for the Community Development Block Grant (CDBG) and the Amendments to the 2022 and the 2023 Annual Action Plans. Formal consideration of the 2024 Annual Action Plan and Amendments to the 2022 and 2023 Annual Action Plan is scheduled for January 8, 2024.

BACKGROUND/KEY POINTS:

Draft 2024 Annual Action Plan: The City has developed its CDBG Annual Action Plan as part of its corresponding five-year plan as required by the U.S. Department of Housing and Urban Development (HUD). Citizen participation includes:

- Public Meeting (September 15, 2023)
- 30-day comment period (ending December 23, 2023)
- Public Hearing (December 11, 2023)
- Final plan consideration by City Council (January 8, 2024)

Change to proposal for 2024 Annual Action Plan: An approved activity for acquisition of residential building lots partnering with Lake Agassiz Habitat for Humanity was awarded \$25,000 in 2022 and \$50,000 in 2023. It is proposed that an additional \$25,000 of 2024 CDBG funds be allocated to Habitat for Humanity (reducing the amount of funds for single family home rehabilitation by \$25,000). The combined total \$100,000 would allow for the purchase of five building lots.

Activity	Description	Budget
Program Administration	Staff support for planning, implementation, reporting, and monitoring of CDBG resources and support for the Moorhead Human Rights Commission. CFR Part 570.206	\$92,600
Acquisition of Land	An affordable housing unit will be constructed through a partnership with Habitat for Humanity. CDBG resources will be used for acquisition and/or site preparation of a lot. Eligible activity in accordance with CFR Part 570.201(a) National Objective: Activity benefiting low and moderate income persons.	\$25,000
Home Rehabilitation Loan Program	Citywide rehabilitation loan program assisting owner-occupants of single-family homes whose income falls below 80% of area median income. Funds are provided on a loan basis up to \$25,000 provided sufficient home equity exists. No interest accrues on the loan and the entire principal balance must be repaid upon sale, title transfer or owner vacancy of the property. Applications from interested individuals are accepted by the City on a first come first-served basis with priority for life safety emergency loans.	\$203,000



City Council Communication

December 11, 2023

	<p>The program is administered by the City of Moorhead. Eligible activity in accordance with CFR Part 570.202(a)(1). National Objective: Activity benefiting low- and moderate-income persons. Activity administration cost included.</p>	
Capital Improvement - Moorhead Public Housing	<p>Assist in the rehabilitation of affordable rental housing development, including replacement of sprinkler heads on fire suppression systems and replacement of fire location panel at Moorhead Public Housing Agency's Sharpview apartments, located at 920 5 Ave S. These repairs are critical for tenants, emergency responders, staff and guests. CDBG funds will be offered as a grant. The City's CDBG investment may be used as a match to leverage additional public and private funding to complete the rehabilitation. (\$80,000 contract/up to \$2,000 Program Administration). Eligible activities in accordance with CFR Part 570.201(c), 570.202(a)(2). National Objective: Activity benefiting low- and moderate-income persons.</p>	\$82,000
Public Services Eligible activities in accordance with CFR Part 570.201(e). National Objective: Activity benefiting low- and moderate-income persons.	<p><u>Recreation Program – Romkey:</u> Recreation activity programming, meal program and/or activities for youth in low-income neighborhoods conducted by Moorhead Parks & Recreation at 900 19 St. S. Participating youth range in age from 3-17 years; the predominant age of participants is under 12 years. Budget: \$8,500 (\$8,000 program/\$500 Activity Administration)</p> <p><u>Opportunities Under Transit ("OUT") Transportation Initiative:</u> Discounted bus pass voucher program for persons who are homeless or extremely low income (less than 30% median income) to provide transportation to and from employment or job training. OUT will provide two monthly bus passes per participant per year. The program will be administered by Metro Area Transit, 701.473.6762</p> <p>Budget: \$15,200 (\$15,000 program/\$200 Activity Administration).</p> <p><u>Afro-American Development Association Youth Program:</u> Youth programming for individuals ages 14-24. Programming helps to shape a positive future through discovering unique talents and abilities through career exploration, mentoring, sports, supportive services, and postsecondary admission application assistance. The program is administered by the Afro-American Development Association at multiple locations throughout Moorhead. Budget: \$8,200 (\$8,000 program/\$200 activity administration).</p> <p><u>Snow Removal Assistance Program:</u> The City of Moorhead will assist homeowners who are elderly and/or disabled with snow removal services. CDBG funds will be used to pay a contractor the City hires to remove snow from public sidewalks abutting the home's driveway, and one walkway to</p>	\$50,400

	CFR Part 570.201(c), 570.202(a)(2). National Objective: Activity benefiting low- and moderate-income persons.	
Public Services Eligible activities in accordance with CFR Part 570.201(e). National Objective: Activity benefiting low- and moderate-income persons.	<p><u>Recreation Program – Romkey:</u> Recreation activity programming, meal program and/or activities for youth in low-income neighborhoods conducted by Moorhead Parks & Recreation at 900 19 St. S. Participating youth range in age from 5-17 years; the predominant age of participants is under 12 years. Budget: \$8,500 (\$8,000 program/\$500 Activity Administration)</p> <p><u>Opportunities Under Transit ("OUT" Transportation Initiative:</u> Discounted bus pass voucher program for persons who are homeless or extremely low income (less than 30% median income) to provide transportation to and from employment or job training. OUT will provide two monthly bus passes per participant per year. The program will be administered by Metro Area Transit, 701.476.6782. Budget: \$15,200 (\$15,000 program/\$200 Activity Administration).</p> <p><u>Afro-American Development Association Youth Program:</u> Youth programming for individuals ages 14-24. Programming helps to shape a positive future through discovering unique talents and abilities through career exploration, mentoring, sports, supportive services, and postsecondary admission application assistance. The program is administered by the Afro-American Development Association at multiple locations throughout Moorhead. Budget: \$8,200 (\$8,000 program/\$200 Activity administration).</p> <p><u>Snow Removal Assistance Program:</u> The City of Moorhead will assist homeowners who are elderly and/or disabled with snow removal services. CDBG funds will be used to pay a contractor the City hires to remove snow from public sidewalk abutting the home, driveway, and one walkway to a door for persons who are accepted into the program. Applicants will be prioritized on a first-come, first-served basis. Budget: \$28,500 (\$28,000 contract/\$500 Activity Administration)</p>	\$60,400

Amendments

- 2022 Annual Action Plan: The Cass Clay Community Land Trust was awarded \$50,000 for the acquisition costs of two residential lots, this activity is being cancelled. This proposed amendment is to utilize those funds to a slum and blight demolition project for the Cass Clay Community Land Trust.
- Currently there are grant funds that remain in the 2020, 2021, and 2022 due to program income exceeding prior year forecasts. These funds will be utilized to amend the 2023 plan and add a new activity for acquisition.

2022 and 2023 Action Plan Amendments

Activity	Description	Budget
Cass Clay Community Land Trust-Home Removal	Removal and clearance of a blighted home located at 1018 3rd Ave N. Funds will be provided for activities that meet National Objective: Slum & Blight Spot Basis [24 CFR Part 570.208 (b)(2)] to prepare site for affordable housing.	\$50,500

2023 Action Plan Amendment:

1. New Activity – Property Acquisition

Currently there are grant funds that remain in the 2023, 2021, and 2022 due to program income exceeding prior year forecasts. These funds will be utilized to amend the 2023 plan and add a new activity for acquisition.

Property Acquisition	Utilize unobligated grant funds that remain in the 2020- \$12,288, 2021- \$9,614, and 2022 \$105,000 grants years. These funds will be utilized to for the acquisition of two city lots located at 1014 and 1016 19 street south. The purpose of acquisition will be to create a child care facility to benefit low and moderate income persons with the nature and location of the facility serving low to moderate income persons and/or affordable housing, recreation space and/or a combination of these uses. Eligibility Acquisition-24, CFR 570.201(a); National Objectives: 24 CFR 570.208(a).	\$125,908
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Agenda Item {{section.number}}.{{item.number}}.



City Council Communication

December 11, 2023

FINANCIAL CONSIDERATIONS:

The Federal Fiscal Year 2024 budget has not yet been approved. The City of Moorhead's estimated CDBG allocation is based on the prior year grant amount. If grant allocation is above estimated amount the additional funds will be allocated to the home rehabilitation program and if allocation is below estimated amount, public service funds would need to be recalculated and decreased.

• \$313,000 – 2024 Estimated CDBG allocation	from 11/10/23
• \$150,000 – Program Income (estimate)	
• \$463,000 – Total Funds available	

Voting Requirements: Not Applicable; public hearing only

Submitted By:

Dan Mahli, City Manager

Lisa Bode, Governmental Affairs Director

Tanya Kunza, Community Development Program Administrator

Attachments:

RESOLUTION 2024-0108-K

Resolution to Approve Submission of 2024 CDBG Annual Action Plan

WHEREAS, the City of Moorhead receives Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, in compliance with federal regulations and consistent with its Five-Year Consolidated Plan for Housing and Community Development (2020-2024), the City of Moorhead has prepared its 2024 Annual Action Plan as a guide for investment of CDBG and other housing community development resources that may be available to address the needs of low to moderate income persons in Moorhead; and

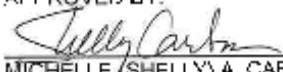
WHEREAS, the City of Moorhead has conducted a citizen participation process including publication of a draft 2024 Annual Action Plan, community public meeting, public hearing and 30-day comment period; and

WHEREAS, since the draft 2024 Action Plan was published for public comment on November 23, 2023, the following modification was proposed and discussed at the public hearing on December 11, 2023: \$25,000 allocated to Habitat for Humanity for costs associated with land acquisition for affordable housing construction, and an associated reduction to Single Family Home Rehabilitation funding by \$25,000.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Moorhead, Minnesota that the Mayor and City Manager are herein authorized and directed to submit the 2024 Annual Action Plan to HUD and enter into and execute contracts and other documents necessary to effectuate activities identified in the 2024 Annual Action Plan.

PASSED: January 8, 2024 by the City Council of the City of Moorhead.

APPROVED BY:


MICHAEL F. (SHELLY) A. CARLSON, Mayor

ATTEST:


CHRISTINA RUST, City Clerk

Grantee Unique Appendices

Assessment of Fair Housing in Moorhead, Minnesota

Housing discrimination has a profound and lasting impact on its victims, as access to housing affects not only where individuals and families live, but the education, employment and other opportunities that are available to them.¹
-Assistant Secretary for Fair Housing and Equal Opportunity, Gustavo Velasquez



City of Moorhead - Municipal/Entitlement Submission, CDBG Formula Grant Recipient Participant
Submitter Contact Information: Tia Braselth, Community Development Program Administrator

Planning & Neighborhood Services, City of Moorhead - City Hall, 500 Carter Avenue | PO Box 779, Moorhead, MN 56561

Period covered by this assessment: 1/31/2015 to 1/31/2020, Renewal Assessment of Fair Housing, Submission Date: 1/31/2015

Departmental Approval: Tom A. Bratton 3/2/15

Human Rights Commission Approval: Virginia Osgood 3/4/15



Note: HUD is in the process of modifying regulations regarding the Assessment of Fair Housing. Completion of this assessment will be guided by further instructions to be provided by HUD, which will provide definitions and contextual information. Future inclusions may include:

- *Adding consultation certifications*
- *HUD populated demographic tables and maps*
- *HUD populated housing tables and maps*
- *HUD populated community assets tables and maps*
- *HUD populated tables and maps related to disability*

If you feel you have experienced discrimination, please contact:



Minnesota Department of Human Rights
Freeman Building
625 Robert Street North
St. Paul, Minnesota 55155
Telephone: (651) 539-1100
MN Relay: 711 or 1-800-627-3529
Toll Free: 1-800-657-3704
Fax: (651) 296-9042
Email: Info.MDHR@state.mn.us



Fair Housing Regional Office for Minnesota
Chicago Regional Office of Fair Housing Equal Opportunity (FHEO)
U.S. Department of Housing and Urban Development
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard, Room 2101
Chicago, Illinois 60604-3507
Telephone: (312) 353-1776 ext. 2453
Toll Free: (800) 765-9372
TTY: (312) 353-7143

Minneapolis HUD Field Office
International Centre
920 Second Avenue South, Suite 1300
Minneapolis, Minnesota 55402-4012
Telephone: (612) 370-3000
TTY: (612) 370-3186

Moorhead Human Rights Commission
500 Center Avenue | PO Box 779
Moorhead, Minnesota 56561-0799
Telephone: (218) 299-5375
www.cityofmoorhead.com



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Executive Summary

The Fair Housing Act prohibits any person from discriminating in the sale or rental of most housing³, the financing of housing, or the provision of brokerage services, including otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, handicap, or familial status. The Fair Housing Act further requires the U. S. Department of Housing and Urban Development (HUD) to administer the programs and activities relating to housing and urban development in a manner to affirmatively further the policies of the Fair Housing Act.

Moorhead's Assessment of Fair Housing is an effort to identify barriers to fair housing choice as they may exist within the jurisdiction and control of the City of Moorhead.

Barriers to fair housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected classes in Minnesota include:

- Race
- Color
- Creed
- Religion
- National origin
- Sex
- Marital status
- Familial status
- Disability
- Public assistance
- Age
- Sexual orientation



Barriers to affordable housing are distinct from barriers to fair housing choice; barriers to fair housing choice are analyzed without regard to income or affordability. Affordability issues are reviewed within the Community Development Block Grant (CDBG) Consolidated Plan for Housing and Community Development. Moorhead's Assessment of Fair Housing is a review of barriers to fair housing choice in the public and private sector, involving:

"a comprehensive review of laws, regulations, and administrative policies, procedures, and practices; an assessment of how these regulations affect the

³ The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

location, availability, and accessibility of housing; and an assessment of conditions, public and private, affecting fair housing choice."

The Assessment of Fair Housing (formerly Analysis of Impediments) is required by the HUD as a condition of receiving CDBG funds. The City of Moorhead certifies in the 2015-2019 Consolidated Plan for Housing and Urban Development that it will fulfill the following obligations:

1. Conduct an Assessment of Fair Housing (AFH);
2. Prepare a description of any steps taken to carry out the certification; and
3. Maintain evidence to support the certification.

The City has prepared this assessment in collaboration with local service providers, area agencies, and citizens who share a common goal to address Moorhead's community development needs in a way that utilizes resources efficiently and thoughtfully. Although barriers to affordable housing are distinct from barriers to fair housing choice, a shortage of affordable housing was the most common problem reported by citizens, service providers, and area agencies when discussing housing. Based on the data and consultations, the populations or household types more affected than others by housing problems are low income households including:

- Single person and single parent households
- People fleeing domestic violence
- People with a criminal history, poor rental history, no credit or poor credit
- Larger families
- People with mental health and/or chemical dependency issues
- Native Americans who represent 27% of the local adult homeless population
- Black or African Americans who represent 14% of the local adult homeless population
- Veterans who represent 12% of the local adult homeless population
- People with a disability

The Moorhead Public Housing Agency (MPHA) reports a total of 178 public housing units in Moorhead. Public housing units are homes and apartments owned by the MPHA and available to low income households. Currently, there are 183 households on the waiting list for these units; 93% are waiting for a 1-bedroom unit. The MPHA also offers housing vouchers, which reduce the monthly rent paid by tenants and allow for very low income households to obtain private sector housing. The MPHA reported 95 vouchers, 70 of which are funded and in use. Not all vouchers are currently being used for a few reasons: 1) voucher holders are unable to find housing where the voucher is accepted, 2) high rental rates, 3) and decreased voucher funding.

Clay County Housing and Redevelopment Authority reported 413 households on their housing voucher waiting list. Most of their vouchers are used in Moorhead where there are 332 tenant-based vouchers and 29 project based vouchers. The Fargo Housing and Redevelopment Authority had 167 vouchers used in Moorhead in 2014 including 6 HUD Veterans Administration Supportive Housing (VASH) vouchers.

The Planning & Neighborhood Services Department of the City of Moorhead is the lead agency in the CDBG Consolidated Plan and Fair Housing Planning requirements. Requests for information and comments may be addressed to:

City of Moorhead – City Hall
Planning & Neighborhood Services Department
Attn: Community Development Program Administrator
500 Center Avenue, 4th Floor
PO Box 779
Moorhead MN 56560
Phone: (218) 299-5375



A coordinated effort of all organizations working in housing and community development will be needed to overcome barriers to fair housing. As the implementation of the CDBG Consolidated Plan is a joint effort of citizens, the City, neighborhood groups, businesses, and community organizations, this same coordinated effort will be needed to assure fair housing choice in Moorhead.

Changing conditions require ongoing examination of fair housing problems and other housing and community development issues. The process of fair housing planning and assessment of fair housing will continue in Moorhead. To the extent that additional barriers to fair housing choice are identified, additional actions will be recommended to overcome the effects of the barriers.

Community Citizen Participation

Citizens were engaged in the planning process by means of the Moorhead Community Survey, prepared and administered by the City. The purpose of the survey was to have citizens identify the most important housing and non-housing community development needs in Moorhead and gain insight into fair housing. The survey results were compared alongside notes taken during conversations/consultations with local service providers/agencies and statistical data provided by agencies or the US Census Bureau. The Moorhead Community Survey was ultimately used to illustrate correlations among citizens, service providers, agencies, and available data.

The survey was available from August 15-31, 2014 in both paper and online formats; paper surveys were circulated by 28 local service providers/agencies and online surveys were available through the City of Moorhead website. A number of the service providers that helped distribute the surveys work with clients who have disabilities and/or limited English proficiency. Many of the service providers have access to translators and case managers available to assist people. The community was notified in-person, by word-of-mouth, and through e-mail and social media. Though the survey was open to both residents and non-residents, 75% of the respondents were Moorhead residents. A total of 499 surveys were completed.

The City of Moorhead consulted with several local service providers/agencies in preparation of the Consolidated Plan. A total of 27 local service providers and agencies were contacted; of the 13 that responded, 12 were consulted in-person and 1 via email. Service providers/agencies were asked to complete a standard SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis, which was conducted alongside an asset-based analysis asking respondents to rank the weight of seven community capitals known to offer sustainable and vibrant communities when equally weighted or balanced². Capitals include cultural, social, human, financial, built, natural, and political.

The Consolidated Plan is available at:
<http://www.cityofmoorhead.com/home/showdocument?id=1735>

² Flora and Flora (2014). Community Capitals. Retrieved on July 1, 2014 from www.soci.iastate.edu/staff/cflora/nrcerd/capitals.html

Analysis

Demographic Summary

Moorhead, Minnesota is located in the Red River Valley where the Red River of the North serves as a state line between North Dakota and Minnesota. North Dakota's largest city Fargo is located across the river from Moorhead. Together, the cities form the Fargo-Moorhead community, one that is growing in population and diversity. Though the area is rich with Scandinavian heritage, the large influx of students, a growing labor force, Native Americans, New Americans, and refugees increasingly change the demographic picture of this area.

According to 2013 US Census Data, Moorhead has a population of 39,082 people and is included in the Fargo-Moorhead Metropolitan Statistical Area (MSA), which has an overall population of 223,490 people³; American Community Survey Census data counted 175,563 in 2005. Although Moorhead has a considerably smaller population than Fargo, both cities experienced growth at the same rate between 2000 and 2010 (1.8% annually; 18% total). Fargo was growing at a faster rate than Moorhead between 1990 and 2000 (22% total); Moorhead's population decreased at a -0.37% rate between 1990 and 2000. According to the 2013 Moorhead Homebuyer Survey, contributing factors to Moorhead's recent growth include value of home purchase, neighborhood features, people's preference to live in a small town with big town amenities, and to reside in Minnesota (See Appendix B for full survey); another is the increase in colleges and student body. Five Moorhead colleges and North Dakota's largest university in Fargo attract several students to the community each year. See Table 1 for 2014 college enrollment counts.

Though a large proportion of Moorhead's total population identifies as White (91%), the non-White population continues to increase (9%). In 1990, 4.7% of the population in Moorhead identified as non-White; in 2000 the percentage was 7.9%. See Table 2 for non-White populations from 1990 to 2013. There are no concentrations of non-White or Hispanic/Latino populations higher than 6% of the overall population in any single census tract or neighborhood in Moorhead. HUD considers disproportionality as a difference of more than 10% of the jurisdiction as a whole. See Figure 1 for race/ethnicity density map; neighborhoods with higher numbers of racial/ethnic populations do not have characteristics that set them apart from neighborhoods with lower numbers of racial/ethnic populations. Each neighborhood has access to transportation, infrastructure, health and safety, and basic services.

Table 1: 2014 College Enrollment Chart

College	Enrollment Numbers
Minnesota State University Moorhead (MSUM)	8,140
Concordia College -Moorhead	2,400
Minnesota State Community & Technical College -Moorhead	8,798
Globe University Minnesota School of Business Moorhead	135
Rasmussen -Fargo/Moorhead	720
North Dakota State University (NDSU) Fargo	14,747 (6,572 MN residents)

³Data obtained on college websites or from college admissions staff in December 2014.

⁴ 2013 American Community Survey US Census Bureau

Though the non-White population as a whole continues to increase, the 2013 US Census Bureau estimates for the number of Black or African American, American Indian or Alaska Native, Asian, and the "Some Other Race" category have independently decreased while the "Two or More Races" category has increased. This could be a result of more people reporting multiple races (e.g., someone reports they are both American Indian and White so they mark "Two or More Races" rather than one). In addition, the 2013 estimates are not collected the same way as decennial data (i.e., 1990, 2000, 2010 census data). Each year the US Census Bureau uses current data on births, deaths, and migration to calculate population change since the most recent decennial census; population, demographic components, and housing units are estimated. See Table 2.

Other facts regarding Moorhead demographics:

- In the past 20 years (1990-2010), Moorhead's foreign born population has nearly doubled. Foreign born residents increased from 816 in 1990 to 1,095 in 2000 to 1,607 in 2010.
- Average family and household sizes are slightly decreasing. See Table 3.
- Median age is increasing. See Table 3.

Table 2: Race/Ethnicity Chart (excludes White population to improve chart visibility of non-White populations. See Appendix Table A for full chart with percentage breakdowns)

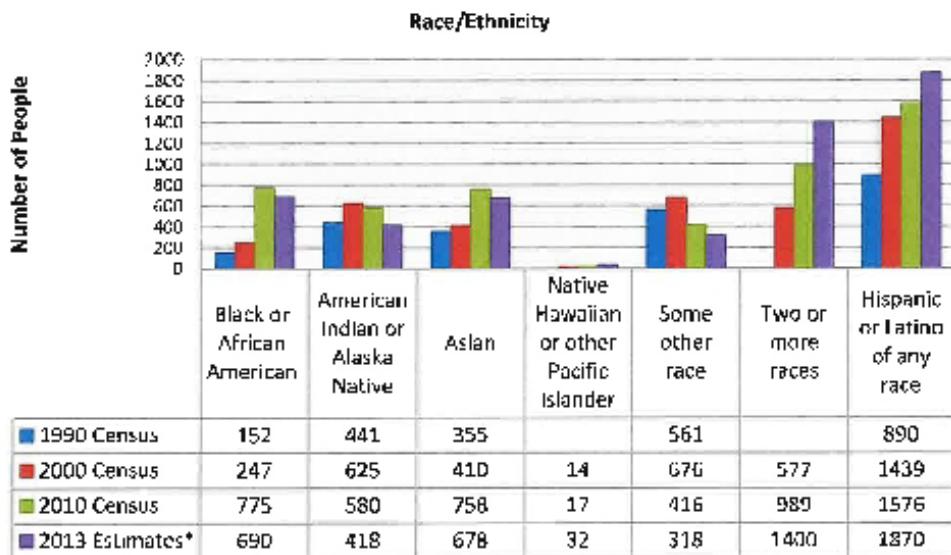


Table 3: Housing/Household Characteristics Chart

Housing/Household Characteristics	2000 Census	2010 Census	2013 Estimates*	2000-'10 % Change
Median Age	28.7	28.3	29.2	-
Total Housing Units (Occupied/Vacant)	12,180 (11,660/520)	15,274 (14,304/970)	15,500 (14,481/1,019)	1.25 (1.23/1.87)
Owner-occupied Housing Units	7,430	8,808	9,023	1.19
Renter-occupied Housing Units	4,230	5,496	5,458	1.30
Average Family Size	3.04	2.97	2.97	0.98
Average Household Size	2.13	2.41	2.41	0.99

* US Census Bureau 2013 population data estimates retrieved on November 28, 2014 from www.census.gov

Segregation/Integration and Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

Segregation and integration is difficult to observe and there is no data currently available that indicates segregation and integration in Moorhead. There are small neighborhoods of various ethnic backgrounds and races dispersed throughout Moorhead, but they are not concentrated. HUD considers "concentrated" to be more than 10% of the overall population and the entire non-White population in Moorhead is less than 10%. See Figure 1 for the highest "concentrations" of ethnic/racial groupings in Moorhead; all represent less than 10% of the total population. Within each area shown on the map, there are a variety of housing types to choose from including apartments, condos, twin and town homes, and single family large and small. In some there is senior living, assisted living, nursing home housing, accessible housing, and student housing.

A different indicator of integration is seen through vacancy and income mapping. Much of Moorhead has a 5-10% vacancy rate, which means that a variety of housing, housing prices, and neighborhoods are available. People can be selective when looking for a place to live and housing choice promotes integration. The highest vacancy rates occur in housing that surrounds the colleges, mostly due to the seasonal nature of student renters (See Figure 2). Varying income levels are also scattered throughout the city (See Figures 3-5) and the maps do not indicate any concentrated areas of poverty (See Figure 6) or racially/ethnically concentrated areas of poverty. When vacancy and income maps overlap, the availability of housing and housing choice is demonstrated.

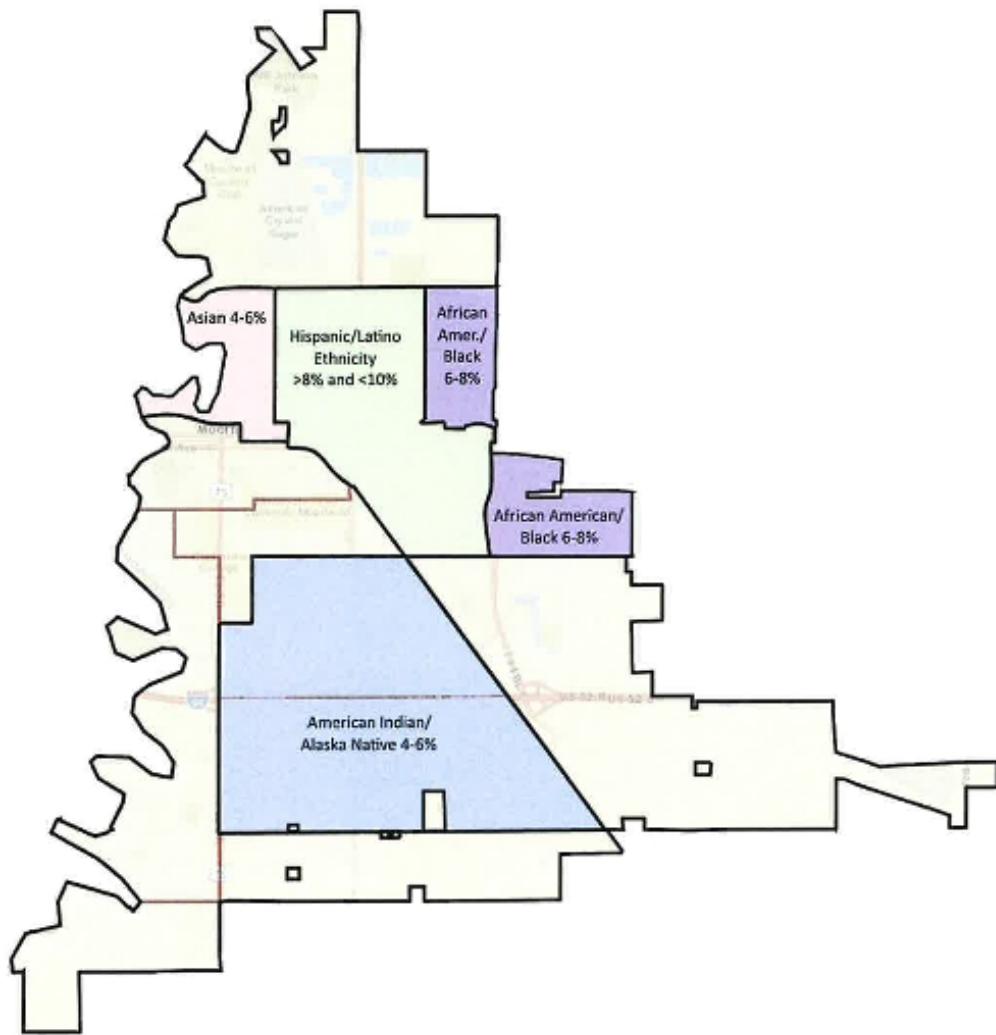


Figure 1. Racial/Ethnic Distribution in Moorhead, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>

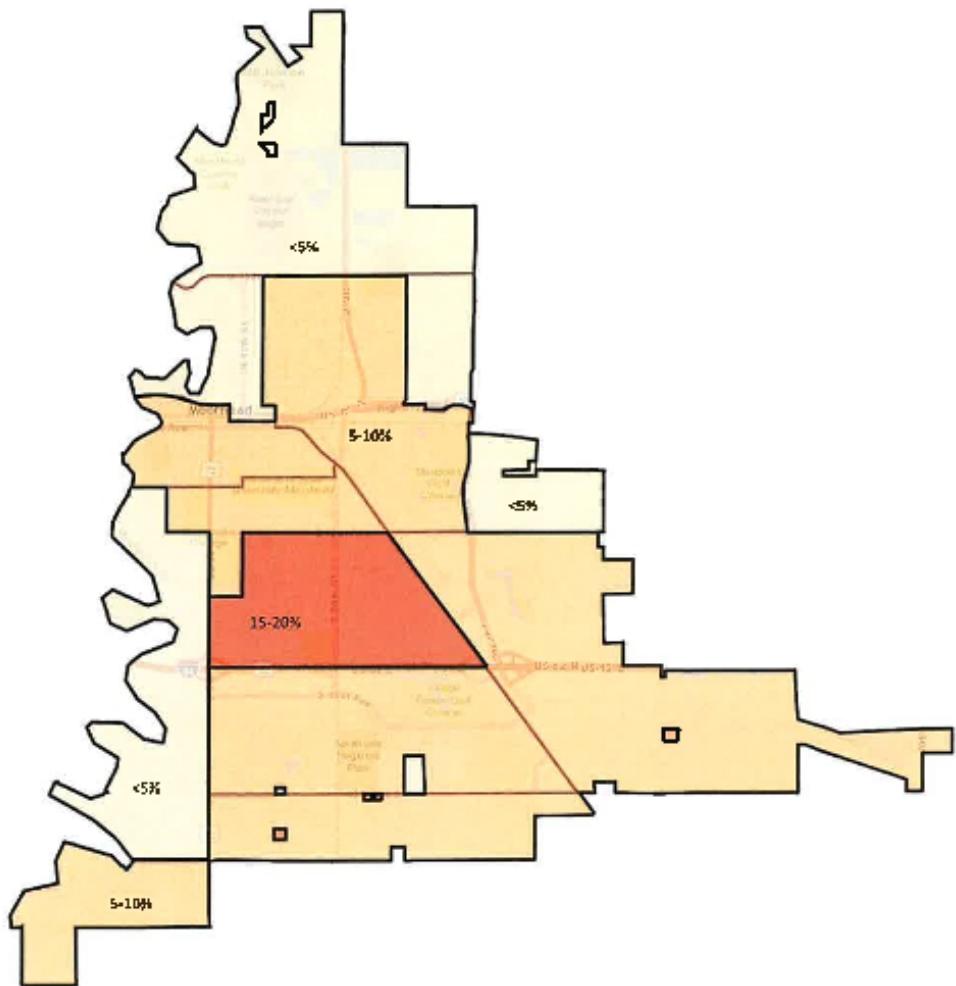


Figure 2. Vacancy Rates in Moorhead, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>.

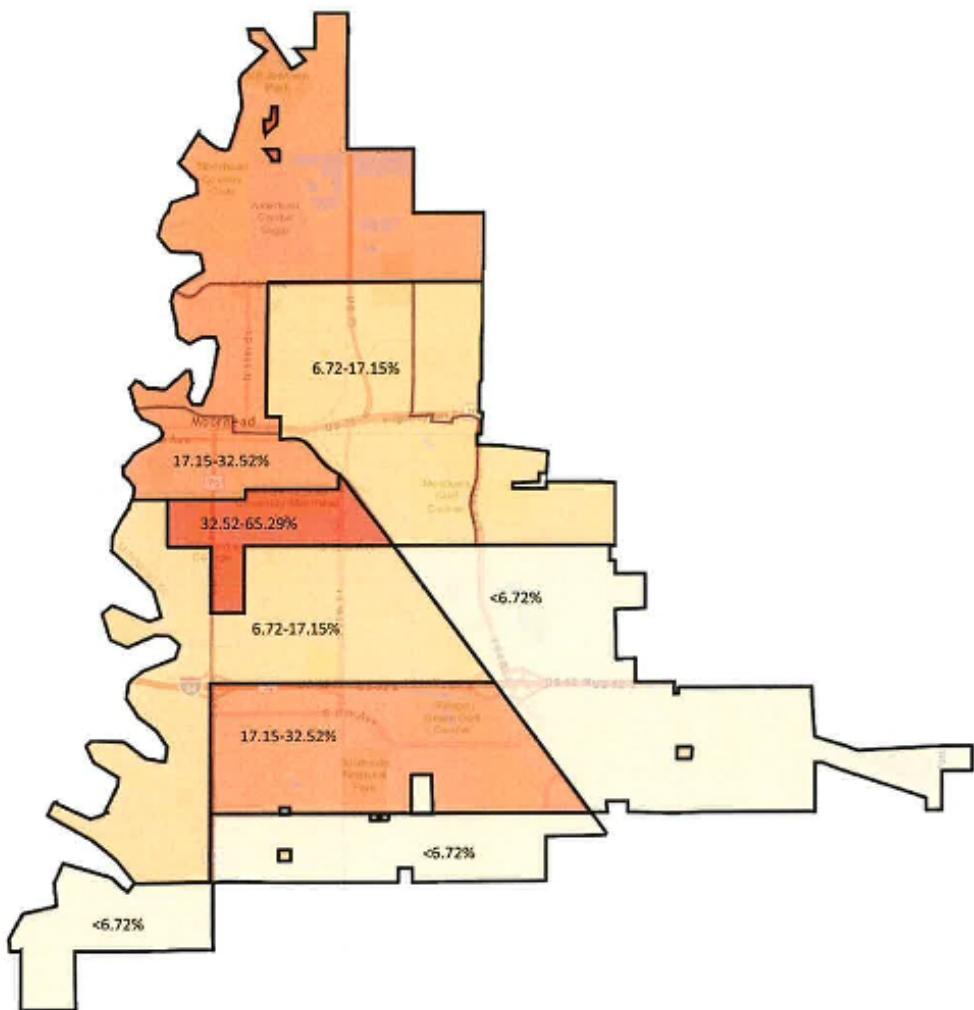


Figure 3. Extreme Low Income Households, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>.

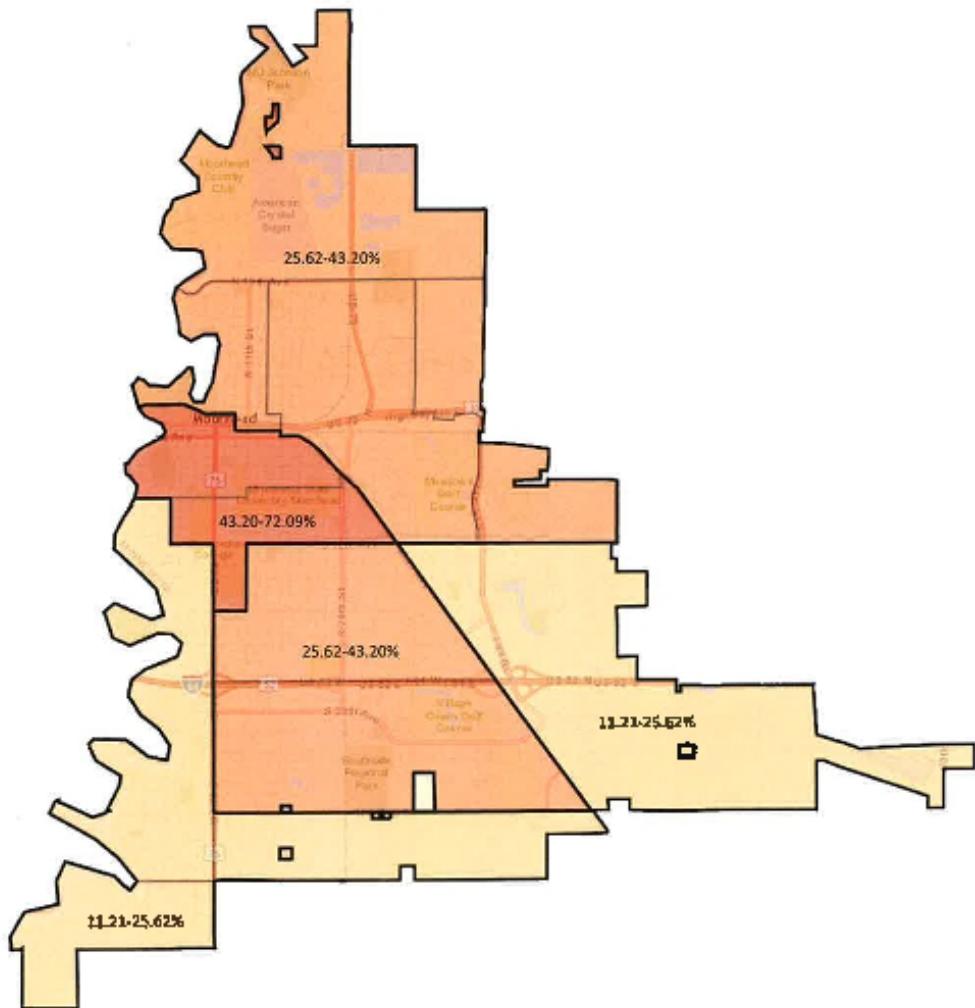


Figure 4. Low Income Households, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>.

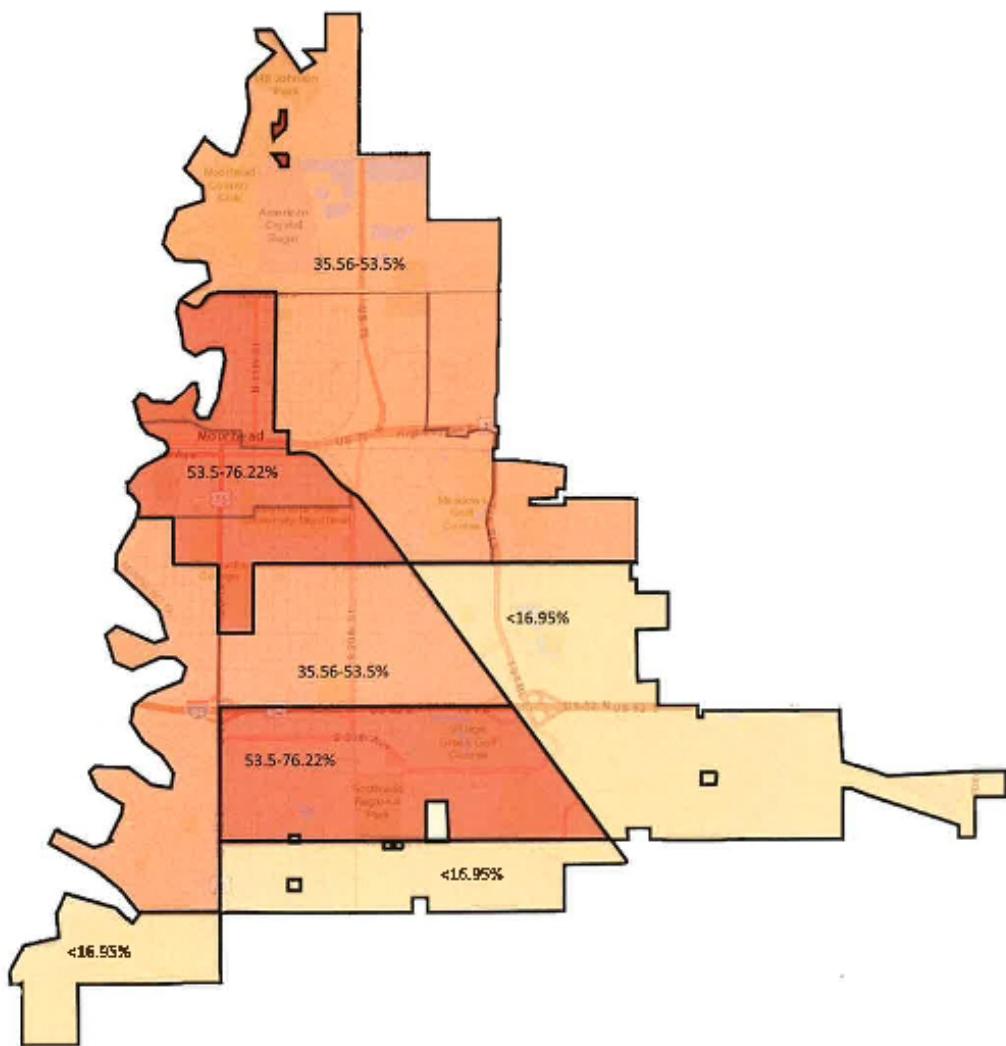


Figure 5. Moderate Income Households, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>.

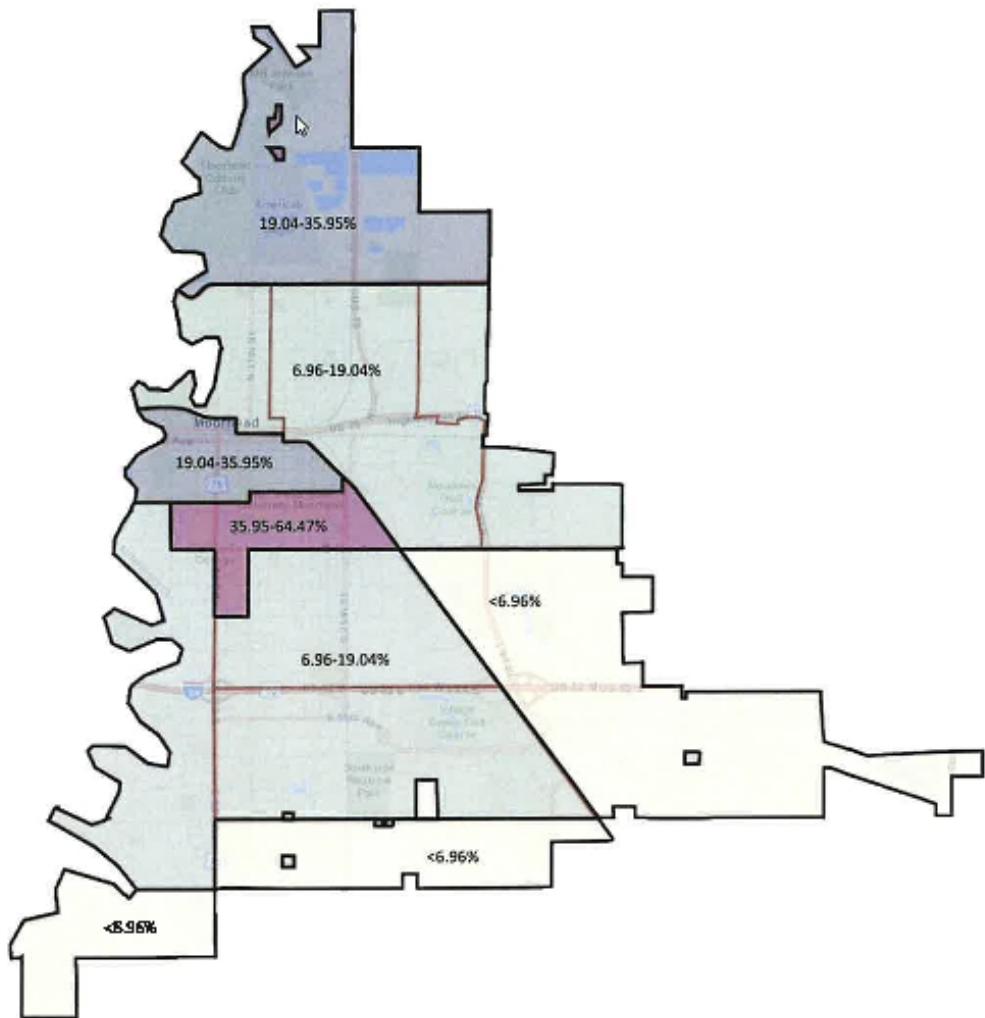


Figure 6. Moorhead Poverty, CPD HUD Maps.

Data retrieved on December 11, 2014 from <http://egis.hud.gov/cpdmaps/>.

Access to Homeownership Opportunity

In the past, the Comprehensive Housing Affordability Study (CHAS) Data Book (2000) reported data on homeownership statistics by household classification including homeownership rates by race. CHAS data is based on US Census data and this type of detail was not collected in recent data collection efforts. The Home Mortgage Disclosure Act (HMDA) provides similar homeownership data and is used in this analysis.

Based on HMDA data, the numbers of home purchase loans originated for people belonging to non White racial categories are considerably lower than those originated for White people. There are also more home purchases reported for males than females. Generally, homeownership increases when income levels increase. This pattern is more recognizable for conventional loans than FHA, FSA/RHS, or VA-type loans.

Racial/ethnic ratios are not reflective of the racial/ethnic population ratios of the area. Between 2009 and 2013, homeownership among White people in Moorhead averaged 97% of the overall population. The remaining racial and ethnic categories ranged between less than 1% and barely over 1% of the population. The demographic of the area is 91% White and 9% non-White racial and ethnic backgrounds. Similar to the United States as a whole, there is a disproportionate number of White homeowners to non-White homeowners, higher than the individual population ratios reflected among the different races. All people are following a similar path throughout the five year period 2009 to 2013. Aside from African American/Black people, all other racial categories had declining homeownership between 2009 and 2010. Aside from Asians, most racial categories remained level or had a slight decrease in homeownership between 2010 and 2011. From 2011 to 2013, all categories had an increase in homeownership; Asians and Hispanic/Latinos had the most dramatic increases in homeownership during this time. See Figure 6 and Appendix Tables A-C.

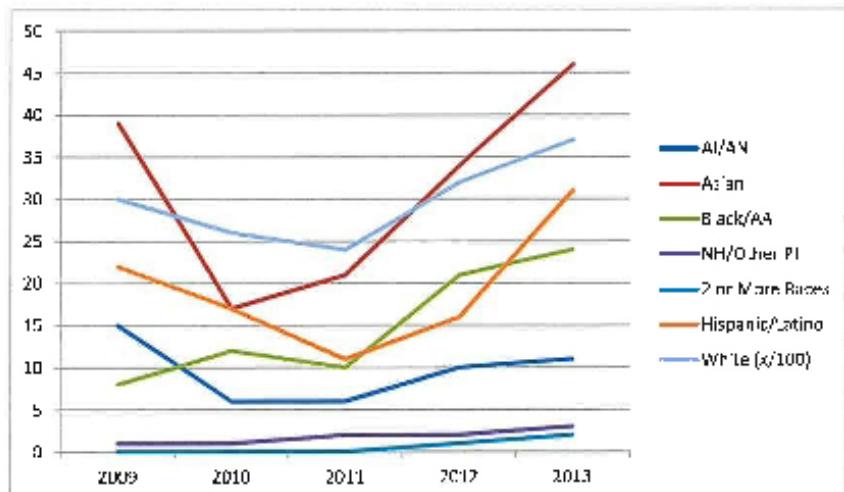


Figure 7. Racial/Ethnic Homeownership Graph -Fargo, ND-Moorhead, MN MSA.

Data retrieved on November 28, 2014 from www.census.gov

Disproportionate Housing Needs

Moorhead's housing stock consisted of 14,304 occupied units as of Census 2010. There were 5,496 (38.4%) rental units and 8,808 (61.6%) owner occupied units. The proportion of rental housing stock to overall housing stock has slightly increased since the 2000 Census (2.4%).

A total of 970 vacant housing units were counted in the 2010 Census in Moorhead. The homeowner vacancy rate was 2% and the rental vacancy rate was 8.6%. The US Census Bureau 2011-2013 American Community Survey 3-Year Estimates counted a 0.3% homeowner vacancy rate and a 6.4 rental vacancy rate. While comprehensive data on the current for-purchase home vacancy rate is not available, it is likely lower than the 2011-2013 estimates due to an increase in demand and sale activity. The current rental housing vacancy rate has decreased to 3.68% (Q3 2014), a drop from 2013 (4.5%) and 2012 (6.3%). In a September 2014 quarterly report on apartment vacancy and construction in the Fargo-Moorhead metropolitan area, approximately 4,313 apartment units were counted in Moorhead. A total of 114 units were constructed during the first 3 quarters of 2014 and 88 were under construction at the time of the report. See Appendix D for full report.

From 2003 to November 2014, 4,093 housing units were built in Moorhead. Multi-family construction totaled 1,734 units and single family home construction totaled 2,359 units. Total numbers varied from year to year. During the ten year period, multi family construction ranged from building 0 units in a year to as many as 276 units. Single family units ranged from 80 to 329 units built per year. See Table 4 for each year.

Based on the data and citizen participation, the populations or household types more affected than others by housing problems are single person and single parent households, people with a criminal history or poor rental history, people with no credit or poor credit, larger families, low income households, people with mental health and/or chemical dependency issues, those fleeing domestic violence, Native Americans who represent 27% of the local adult homeless population, Black or African Americans who represent 14% of the local adult homeless population, veterans who represent 12% of the local adult homeless population, and in some cases, those with a disability. The Clay County HRA specifically reports that those with mental health issues and people of color are more affected by housing problems than others.

The inability to communicate and comprehend English can also be a significant barrier to housing and other life necessities. The Fargo Moorhead community has seen a significant increase in the number of languages spoken with the relocation of many New Americans and refugees from around the world. Interpreters are often needed to assist with navigating the systems of education, housing, medical care, and other services.

For fair housing choice, tenant education is offered in many languages besides English, including Arabic, Bosnian, French, Vietnamese, Kurdish, Nepali, Spanish, Kirundi, Somali, Swahili, and Tigrigna. One-on-one educational sessions with deaf clients and people who speak some of the various languages previously listed are also made available. Homebuyer education is offered with interpreter services upon request.

Though there are Moorhead households with significant housing needs, the data¹ does not demonstrate any racial or ethnic groups with disproportionately greater needs (more than 10% of the whole). As income increases, housing problems decrease.

¹ 2007-2011 Comprehensive Housing Affordability Strategy (CI-ASI) Data

Table 4. Moorhead Housing Units Constructed 2003-2014 YTD

Year	Multi Family Units	Single Family Units	Total Units
2003	164	195	359
2004	182	293	475
2005	194	320	514
2006	153	329	482
2007	106	225	331
2008	122	190	312
2009	124	175	299
2010	0	160	160
2011	81	80	161
2012	63	86	149
2013	276	129	405
2014 YTD	269	177	446
Total Built	1734	2359	4093

City of Moorhead Construction Data/2014 YTD data to be updated at year end.

Disparities in Access to Community Assets and Exposure to Adverse Community Factors

Disparities in Community Assets

- School: No students of any particular race/ethnicity or national origin group(s) have far greater access to high-performing schools than students of different race/ethnicity or national origin group(s). All of schools in Moorhead (public, parochial, and Montessori) accept all students. Parochial schools have scholarships or financial aid for families in financial need.
- Public Transportation: Though there are some areas of limited service, there is no data available that demonstrates any differences in the availability of public transportation based on the predominant race, ethnicity, or national origin. No single race has less or more access to public transportation than another. Public transportation goes to all sections of Moorhead.
- Access to Jobs and Unemployment: There is no data available that demonstrates disparities in proximity to jobs and labor market engagement by race or ethnicity.

Exposure to Adverse Community Factors

- Exposure to Neighborhood Poverty: Though there are neighborhoods that have lower income than others, there are no racially/ethnically concentrated areas of poverty (R/FCAPs) in Moorhead. In some lower income neighborhoods there is free after school and summer park programming for children and regular police patrol.
- Environmental Health Hazards: There are no neighborhoods that stand out as having a particularly high levels of environmental hazards.

Moorhead does not have any R/FCAPs or any racially or ethnically concentrated areas in general. Moorhead is also a small community in both population and physical size. These two

factors combined result in the absence of neighborhoods experiencing poor access to assets and high exposure to adverse factors.

Disability and Access

2010 Census data on disability was not available, but 5-year estimates were available from the US Census Bureau American Community Survey 2008-2012. Less than 1% of the population under age 5 had a disability; 5.3% of the population with a disability was between the ages of 5 and 17, 7.8% was between ages 18 and 64, and 30.2% were over the age of 65. The most common disability in children and adults up to age 64 was a cognitive difficulty; for those over the age of 65, the most common disability was an ambulatory difficulty and then a hearing difficulty.

A disproportionate number of Black or African Americans, American Indians, Alaska Natives, and those who identified as "some other race" (other than White, Black, African American, American Indian, Alaska Native, Asian, Native Hawaiian, or Other Pacific Islander) have a disability. Black or African American people only represent 1.8% of the population, yet they represent 19.3% of the disabled population. American Indians and Alaska Natives combined only represent 1.1% of the population, yet represent 12.9% of the disabled population. Those who identified as "some other race" represent less than 1% of the population, yet represent 26.1% of the disabled population. People who identify as members of racial or ethnic minority groups have more people with disabilities and health disparities than Whites because of poor quality healthcare and/or lack of access to healthcare⁷.

When constructing, adding on to, or altering multifamily housing, the Minnesota State Building Code requires buildings to meet accessibility design standards (2015 Minnesota Accessibility Code). Some examples of the design standards are site and building access, accessible restrooms, accessibility between different floor levels, universal accessibility features for sight and hearing impaired persons, and accessibility for extremes of physical size. These standards do not apply to residential dwellings with three or fewer units in a building, but any CDBG-assisted units require adherence to Section 504 regulations. Section 504 is part of the Rehabilitation Act of 1973 and is defined by HUD:

No otherwise qualified individual with a disability in the United States...shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. (29 U.S.C. 794). This means that Section 504 prohibits discrimination on the basis of disability in any program or activity that receives financial assistance from any federal agency, including the U.S. Department of Housing and Urban Development (HUD) as well as in programs conducted by federal agencies including HUD.

⁷ The United States Department of Health and Human Services 2013 National Healthcare Disparities Report, retrieved on November 21, 2014 at www.ahcqr.gov

In the Moorhead Community Survey, respondents were asked what were the 4 most important housing needs in Moorhead; housing for disabled persons ranked 7th most important housing need out of 8. Fair housing education ranked 8th. See the survey results in Appendix B.

While single family homes are not required to be constructed to accessibility standards, the City of Moorhead finances accessibility improvements through its single family rehabilitation loan program. The City also has a partnership with Freedom Resource Center to build permanent ramps or install temporary ramps for people who have a household member with a mobility difficulty. In 2013 CDBG funds were utilized to help Access of the Red River Valley build an accessible twin home for disabled people. More accessible homes could result from similar partnerships in the future. All of these programs are limited to persons who have income at or below 80% of median income.

During Homebuyer Education classes, City staff also promotes the Minnesota Housing Finance Agency's Fix Up loans which may be used for accessibility improvements. There is no income limit on eligible Fix Up loan applicants.

Fair Housing Compliance and Infrastructure

The Moorhead Community Survey conducted by the City of Moorhead in 2004 and 2014 asked respondents to indicate whether housing discrimination occurred in Moorhead. In 2004, 13.6% of respondents reported that housing discrimination was a serious or very serious problem in Moorhead. In 2014, 28% of respondents thought that housing discrimination often or always occurred in Moorhead, but the number of people who reported experiencing housing discrimination in Moorhead was less (13%).

Legal Services of Northwest Minnesota indicates that weekly complaints are received regarding housing discrimination and that the complaints have not decreased in numbers over the past ten years. Between 2007 and 2013, there were 14 discrimination reports to HUD from Moorhead. The Minnesota Department of Human Rights had 48 reports from Moorhead between 2004 and 2013. Some reporters had multiple issues in a single report (e.g., disability, sex). See Table 5.

Table 5. Discrimination Reports in Moorhead (2004-2013)

Basis (highest to lowest reported)	Reports
Disability	44
Race	34
Housing Related (minimum known)	31
Age	15
Sex	14
National Origin	10
No Basis	10
Marital Status	4
Familial Status	3
Sexual Orientation	3
Public Assistance Status	3
Religion	2

Data provided by Minnesota Human Rights Commission and HUD in November 2014.

There are numerous organizations and initiatives underway in Moorhead that educate and/or advocate fair housing rights for residents and fair housing responsibilities for providers of housing:

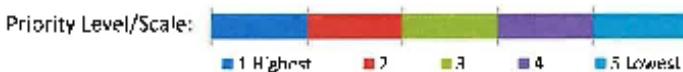
- **Moorhead Human Rights Commission:** recommending board to the City Council and a resource to the community for human rights education and resolution of human rights issues.
- **Fargo Moorhead Coalition for Homeless Persons:** works in partnerships to find permanent solutions to prevent, reduce, and end homelessness, serves as a voice for the local homeless population and ensures their fair housing rights.
- **Lakes and Prairies Community Action Partnership:** assists people and families with a variety of housing needs while ensuring fair housing rights.
- **Freedom Resource Center:** provides information on any disability-related topic, makes efforts to implement local, state, and federal policy changes to make facilities, services, and opportunities available and accessible to individuals with disabilities, helps with reports of discrimination.
- **Access of the Red River Valley:** offers innovative and caring programs for individuals with a variety of disabilities, builds accessible homes for people with disabilities.
- **Successful Outcomes for Tenants and Landlords Committee:** offers educational seminars to tenants and landlords on a variety of topics including fair housing and tenant landlord rights and responsibilities, strives to find ways to improve the relationships and interactions between tenants and landlords.
- **Cultural Diversity Resources:** nonprofit organization working with New Americans and recent immigrants on self-sufficiency

- **Legal Services of Northwest Minnesota:** Nonprofit organization offering legal services to low income persons in the community, including housing related legal issues
- **Village Financial Resource Center Homebuyer Education and Tenant Education Programs:** Nonprofit organization that provides free classes to persons interested in purchasing homes and to renters interested in learning more about their rights and responsibilities as tenants. Tenant Education has become a requirement for persons applying for public housing in Cass and Clay Counties.
- **Moorhead Crime Free Multi Housing Program:** Offered by the Moorhead Police Department as part of a certification program for rental properties; includes a fair housing component as part of the landlord training.

The number of organizations and their various constituencies working toward mutual goals strengthens the community's outreach on fair housing issues.

Fair Housing Goals and Priorities

Several people are involved in making persistent and significant efforts to affirmatively further fair housing in Moorhead; citizens, organizations, the Mayor and City Council, the Moorhead Human Rights Commission, and City staff. The City of Moorhead will continue to comply with the requirements of the Fair Housing Act by preventing discrimination as it provides housing assistance to any person because of race, age, religion, sex, sexual orientation, national origin, disability, marital status, familial status, or public assistance status. The City of Moorhead will continue to affirmatively further fair housing through fair housing planning and analysis of fair housing within the jurisdiction and region. Based on the results of this continued analysis, the City of Moorhead will take appropriate actions to overcome the effects of any additional issues identified and maintaining records of analysis and action. The following is a summary of Moorhead's fair housing goals and priorities:



1. Segregation/Integration and Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

Segregation and integration is difficult to observe and there is no data currently available that indicates segregation and integration in Moorhead. There are small neighborhoods of various ethnic backgrounds and races dispersed throughout Moorhead, but they are not concentrated. HUD considers "concentrated" to be more than 10% of the overall population and the entire non-White population in Moorhead is less than 10%.

Goals: Continue to be cognizant of the possibility/concept of segregation, integration, and racially or ethnically concentrated areas of poverty (R/ECAPs) in Moorhead.

Measurement of Success: Generate an annual race and ethnicity density map from CPD Maps. Should any R/ECAPs develop, the City of Moorhead will respond accordingly.

Time Frame: 2015-2019

Priority Level: 5 (not a current issue, will monitor)

2. Disproportionate Housing Needs

Though there are Moorhead households with significant housing needs, the data¹ does not demonstrate any racial or ethnic groups with disproportionately greater needs (more than 10% of the whole). As income increases, housing problems decrease.

Goals:

- Continue to participate financially in the provision of tenant and homebuyer education and the crime-free multi housing program.
- Continue to encourage the availability of interpreter services for housing activities.

¹ 2007-2011 Comprehensive Housing Affordability Strategy (CHAS) Data

- Continue to support housing certificate/voucher programs.
- Continue to partner and support relationships with organizations concerned about fair housing rights.

It is recognized that homeownership is an important component of a household's financial stability and wealth generation, and the City of Moorhead must work to maintain availability of its affordable single and multifamily housing units, increase the supply of such units and affirmatively market the availability of down payment assistance and homebuyer education opportunities to persons of protected classes.

Measurement of Success:

- Provide homebuyer and tenant education classes for 3,800 households/people. Classes provide a section on fair housing rights.
- Rehabilitate 15 existing or construct new housing for income eligible households.
- Provide City-wide rehabilitation loan program assisting 30 owner-occupants of single family homes whose income falls below 80% of area median income.
- Construct 5 new housing for income eligible households through partnerships with area organizations (i.e., acquire/donate vacant lots/Habitat for Humanity).

Time Frame: 2015-2019

Level of Priority: 3

3. Disparities in Access to Community Assets and Exposure to Adverse Community Factors

Moorhead does not have any racially or ethnically concentrated areas of poverty or any racially or ethnically concentrated areas in general (greater than 10%). Moorhead is also a small community in both population and physical size. These two factors combined result reduce the likelihood of neighborhoods experiencing poor access to assets and high exposure to adverse factors.

Goals: Continue to be cognizant of the possibility/concept of disparities in access to community assets and exposure to adverse community factors.

Measurement of Success: Generate an annual race and ethnicity density map from CPD Maps. Should any R/ECAPs develop, the City of Moorhead will respond accordingly. Also analyze annually any disparities in access to community assets and exposure to adverse community factors.

Time Frame: 2015-2019

Level of Priority: 4 (not a current issue, will monitor)

4. Disability and Access Issues

The highest numbers of discrimination reports in Moorhead were related to disability, 10 (23%) of the 44 disability-related filings were specifically related to housing discrimination.

Goals:

- Annually distribute information on accessibility renovation and ramp installation information to all metropolitan organizations serving persons with disabilities.

- Continue to enforce requirements of Minnesota Building Code and Section 504 legislation.
- Communicate annually and seek opportunities to partner with organizations that offer disability services.

Measurement of Success: Complete 10 accessibility renovations and/or ramp installations.

Time Frame: 2015-2019

Level of Priority: 1

5. Fair Housing Compliance and Infrastructure

Goals:

- Continue to support and partner with organizations dedicated to fair housing and discrimination issues/reports.
- Annually distribute housing opportunities (education, down payment assistance, and low-interest mortgage financing) information to all metropolitan organizations serving persons of protected classes.
- Continue to affirmatively market the availability of homeownership opportunities to organizations serving a significant proportion of people with disabilities and/or diverse racial populations.

Measurement of Success:

- Provide homebuyer and tenant education classes for 3,800 households/people. Classes provide a section on fair housing rights.
- Assist in the Moorhead Human Rights Commission hosting 5 fair housing activities.
- Conduct annual communication regarding housing opportunities to metro organizations serving persons of protected classes.

Time Frame: 2015-2019

Level of Priority: 2

Appendix A: Questionnaire for HUD's Initiative on Removal of Regulatory Barriers

America's Affordable Communities Initiative	U.S. Department of Housing and Urban Development	OMB approval no. 2535-0120 (exp. 09/30/2014)
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Public reporting burden for this collection of information is estimated to average 3 hours. This includes the time for collecting, reviewing, and reporting the data. The information will be used for encourage applicants to pursue and promote efforts to remove regulatory barriers to affordable housing. Response to this request for information is required in order to receive the benefit to be claimed. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

Questionnaire for HUD's Initiative on Removal of Regulatory Barriers

Part A. Local Jurisdictions, Counties Exercising Land Use and Building Regulation Authority and Other Applicants Applying for Projects Located in such Jurisdictions or Counties (Collectively, Jurisdiction)

	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
1. Does your jurisdiction's comprehensive plan (or in the case of a tribe or TDHE, a local Indian Housing Plan) include a "housing element"? A local comprehensive plan means the adopted official statement of a legislative body of local government that sets forth (in words, maps, illustrations, and/or tables) goals, policies, and guidelines intended to direct the present and future physical, social, and economic development that occurs within its planning jurisdiction and that includes a unified physical plan for the public development of land and water. If your jurisdiction does not have a local comprehensive plan with a "housing element," please enter no. If no, skip to question #4.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
2. If your jurisdiction has a comprehensive plan with a housing element, does the plan provide estimates of current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate and middle income families, for at least the next five years?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
3. Does your zoning ordinance and map, development and subdivision regulations or other land use controls conform to the jurisdiction's comprehensive plan regarding housing needs by providing: a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient land zones or mapped "as-of-right" in these categories, that can permit the building of affordable housing addressing the needs identified in the plan? (For purposes of this notice, "as-of-right," as applied to zoning, means uses and development standards that are determined in advance and specifically authorized by the zoning ordinance. The ordinance is largely self-enforcing because little or no discretion occurs in its administration.) If the jurisdiction has chosen not to have either zoning, or other development controls that have varying standards based upon districts or zones, the applicant may also enter yes.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
4. Does your jurisdiction's zoning ordinance set minimum building size requirements that exceed the local housing or health code or is otherwise not based upon explicit health standards?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

5. If your jurisdiction has development impact fees, are the fees specified and calculated under local or state statutory criteria? If no, skip to question #7. Alternatively, if your jurisdiction does not have impact fees, you may enter yes.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
6. If yes to question #5, does the statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus), and a method for fee calculation?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
7. If your jurisdiction has impact or other significant fees, does the jurisdiction provide waivers of these fees for affordable housing?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
8. Has your jurisdiction adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis. For further information see HUD publication: "Smart Codes in Your Community: A Guide to Building Rehabilitation Codes" (www.huduser.org/publications/dstech/smarcodes.html)	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
9. Does your jurisdiction use a recent version (i.e. published within the last 5 years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO), the National Fire Protection Association (NFPA)) without significant technical amendment or modification. In the case of a tribe or TDHE, has a recent version of one of the model building codes as described above been adopted or, alternatively, has the tribe or TDHE adopted a building code that is substantially equivalent to one or more of the recognized model building codes? Alternatively, if a significant technical amendment has been made to the above model codes, can the jurisdiction supply supporting data that the amendments do not negatively impact affordability.	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
10. Does your jurisdiction's zoning ordinance or land use regulations, permit manufactured (HUD-Code) housing "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing that will be deemed ready, irrespective of the method of production?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes

11. Within the past five years, has a jurisdiction official (i.e., chief executive, mayor, county chairman, city manager, administrator, or a tribally recognized official, etc.), the local legislative body, or planning commission, directly, or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or hearings, or has the jurisdiction established a formal ongoing process, to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
12. Within the past five years, has the jurisdiction initiated major regulatory reforms either as a result of the above study or as a result of information identified in the barrier component of the jurisdiction's "HCD Consolidated Plan"? If yes, attach a brief list of these major regulatory reforms.	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
13. Within the past five years has your jurisdiction modified infrastructure standards and/or authorized the use of new infrastructure technologies (e.g. water, sewer, street width) to significantly reduce the cost of housing?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
14. Does your jurisdiction give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing? (As applied to density bonuses, "as of right" means a density bonus granted for a fixed percentage or number of additional market rate dwelling units in exchange for the provision of a fixed number or percentage of affordable dwelling units and without the use of discretion in determining the number of additional market rate units.)	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
15. Has your jurisdiction established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits? Alternatively, does your jurisdiction conduct concurrent, not sequential, reviews for all required permits and approvals?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
16. Does your jurisdiction provide for expedited or "fast track" permitting and approvals for all affordable housing projects in your community?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
17. Has your jurisdiction established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time period, results in automatic approval?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes
18. Does your jurisdiction allow "accessory apartments" either as: a) a special exception or conditional use in all single-family residential zones or, b) "as of right" in a majority of residential districts otherwise zoned for single-family housing?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
19. Does your jurisdiction have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
20. Does your jurisdiction require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Total Points:	0	22

Appendix B: Moorhead Community Survey Results -CDBG

Community Survey Results -Community Development Block Grant

A total of 499 surveys were completed from August 15-31, 2014. The survey was available on the City of Moorhead's website and paper copies were distributed at various agencies throughout Moorhead. Results to housing-specific questions are provided below:

In your opinion, what are the 4 most important housing needs in Moorhead? Total votes = 1968

Housing Needs	Percentage of Votes	Number of Votes
Affordable Rental Housing	18%	362
Affordable Housing for Purchase	16%	309
Energy Efficiency Improvements	14%	280
Home Rehabilitation	13%	264
Homeowner Assistance	12%	227
Senior Housing	10%	187
Housing for Disabled Persons	9%	181
Fair Housing Education	8%	164

How often do you think housing discrimination occurs in Moorhead? Total votes= 489

Frequency	Percentage of Votes	Number of Votes
Never	2%	11
Rarely	16%	79
Sometimes	53%	260
Often	24%	119
Always	4%	20

Have you ever experienced housing discrimination in Moorhead? Total votes = 496

Response	Percentage of Votes	Number of Votes
Yes	13%	64
No	87%	432

If you answered YES: Who do you believe you discriminated against you (choose all that apply)?

Total votes = 86

Person or Agency	Percentage of Votes	Number of Votes
Landlord	70%	60
Real Estate Lender	10%	9
Mortgage Lender	6%	5
Other	14%	12

Other included staff, rental agency/manager, maintenance personnel, police officer, and homeless shelter.

What are the reasons you were discriminated against? Total votes = 141

Protected Classes in Minnesota	Percentage of Votes	Number of Votes
Receipt of Public Assistance	26%	37
Race	18%	26
Familial Status	12%	17
Physical or Mental Disability	10%	14
Color	9%	13
National Origin	5%	9
Marital Status	6%	8
Sexual Orientation	5%	7
Religion	4%	6
Sex	3%	4
Creed	2%	3
Age	1%	1

Did you report the incident? Total votes = 73

Response	Percentage of Votes	Number of Votes
Yes	14%	10
No	86%	63

If YES, to whom did you report the incident? Total votes = 28

Person or Agency	Percentage of Votes	Number of Votes
Business Owner/Manager	18%	5
Elected Official	7%	2
Moorhead Human Rights Commission	14%	4
MN Dept. of Human Rights	14%	4
HUD	21%	6
Other	25%	7

Other included a fair housing authority (Unknown agency, possibly HUD's Fair Housing and Equal Opportunity), supervisors, homeless shelter director, the City, and a VA Social Worker.

If NO, why didn't you report it? Total votes = 101

Reason	Percentage of Votes	Number of Votes
Afraid of retaliation	12%	12
Don't believe it makes a difference	39%	39
Don't know where to report it	30%	30
Too much trouble	11%	11
Other	9%	9

Other included waiting to report it and found another place to live.

Demographic Information

Are you a Moorhead resident? Total votes = 490

Response	Percentage of Votes	Number of Votes
Yes	75%	368
No	25%	124

Current Housing Status Total votes = 484

Status	Percentage of Votes	Number of Votes
Renter	43%	209
Homeowner	52%	252
Homeless	5%	23

How many people live in your home? Total votes = 475

Number of People	Percentage of Votes	Number of Votes
0	1%	4
1	23%	111
2	30%	142
3	17%	80
4	17%	81
5	8%	38
6	2%	9
7	1%	4
8	1%	3
9-12	0%	3
13	0%	2

How many of those are children under 18? Total votes = 399

Number of People	Percentage of Votes	Number of Votes
1	15%	60
2	18%	70
3	8%	33
4	7%	9
5	1%	4
6	1%	3

What is your age? Total votes = 466

Age	Percentage of Votes	Number of Votes
Under 13 years old	0%	1
13-17	0%	0
18-24	13%	62
25-34	25%	115
35-44	21%	100
45-54	18%	82
55-64	14%	65
65-74	6%	26
75-84	4%	17
85 years or older	1%	4

What is your annual household income? Total votes = 458

Income	Percentage of Votes	Number of Votes
\$0-\$21,650	32%	152
\$21,651-\$36,050	13%	61
\$36,051-\$57,700	16%	75
\$57,701-\$72,100	13%	60
\$72,101+	26%	120

What is your race (choose all that apply)? Total votes = 506

Race	Percentage of Votes	Number of Votes
White	86%	435
African American/Black	5%	24
Asian	1%	3
American Indian/Alaska Native	5%	23
Native Hawaiian/Other Pacific Islander	0%	1
Other: Multi-Racial	4%	20

Are you Hispanic or Latino? Total votes = 470

Response	Percentage of Votes	Number of Votes
Yes	5%	22
No	95%	448

Appendix C: 2014 Homebuyer Survey



2014 Homebuyer Survey

In June and July of 2014, the City of Moorhead surveyed all 2013 purchasers (617) of existing and newly constructed homes regarding their home buying experience and their impressions of Moorhead. The survey was distributed by mail and respondents could complete a paper response (stamped return envelopes were enclosed) or complete it through the City's website (hidden link). The response rate was 33% (205 responses). Responses to individual questions are detailed below. Please note that the total responses for individual questions may not total 205; some questions allowed for multiple responses and not all respondents answered each question.

1. Did you own a home prior to this home purchase?

Yes = 62% (125 respondents)
No = 38% (78 respondents)

Most respondents owned homes prior to their 2013 Moorhead home purchase.

2. Is your current home:

Newly constructed (you are the first occupant) = 11% (22 respondents)
Existing/Previously occupied = 89% (178 respondents)

A significant majority of respondents purchased existing homes.

3. Immediately prior to purchasing your home, where did you live?



Location	Percentage	Respondents
Moorhead	36.8%	74
Fargo (south)	17.9%	36
Minnesota outside Clay County	13.4%	27
Fargo (north)	9%	18
West Fargo	7.4%	15
Outside MN/ND (in the US)	6%	12
Elsewhere in Clay County	4%	8
Elsewhere in ND	4%	8
Outside of the US	1.5%	3
	100%	201

37% of respondents most recently lived in Moorhead before buying their current home; 34% lived in Fargo or West Fargo; 7% came from states outside of MN/ND or from another country.

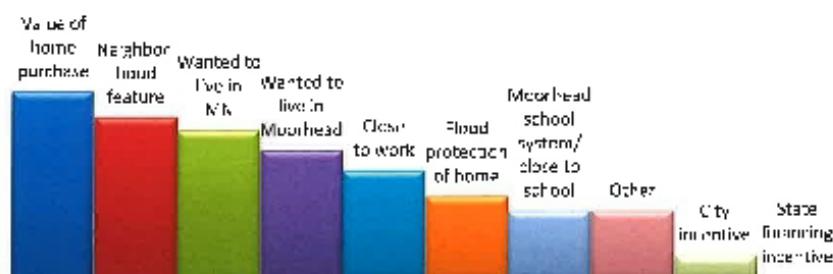
4. Where else did you consider purchasing a home?



Location	Votes (#)
Fargo	106
Did not consider living anywhere but Moorhead	57
West Fargo	55
Dilworth	53
Other	27

Most homebuyers are "shopping around" the metro area.

5. Besides the features of the home you purchased, what were the 3 most important factors influencing your decision about where to live? Please choose up to 3.



Reason	Votes (#)
Value of your home purchase	103
Neighborhood feature	89
Wanted to live in MN	82
Wanted to live in Moorhead	71
Close to work	60
Flood protection of home	46
Moorhead school system/close to school	38
Other	38
City incentive (e.g., First & New, tax rebate)	14
State financing Incentive/program	2
Welcome Home Pass	0

6. Now that you've lived in Moorhead for a while, how do you feel about these community features? 1=very dissatisfied to 5=very satisfied.

YOUR NEIGHBORHOOD

89% of Moorhead homebuyers surveyed said they were satisfied or very satisfied with the neighborhoods!

Rating	#	%
5	103	51.5%
4	75	37.5%
3	19	9.5%
2	3	1.5%
1	0	0%
	200	

AFFORDABILITY/COST OF LIVING

71.4% of Moorhead homebuyers surveyed said they were satisfied or very satisfied with Moorhead's affordability and cost of living!

Rating	Respondents	%
5	40	20.1%
4	102	51.3%
3	45	22.6%
2	7	3.5%
1	5	2.5%
	199	

K-12 EDUCATION

76% of Moorhead homebuyers surveyed said they were satisfied or very satisfied with Moorhead's K-12 education!

Rating	#	%
5	27	27%
4	49	49%
3	17	17%
2	5	5%
1	2	2%
	100	

PARKS AND RECREATION

80.4% of Moorhead homebuyers surveyed said they were satisfied or very satisfied with Moorhead's parks and recreation opportunities!

Rating	#	%
5	66	35.9%
4	82	44.5%
3	32	17.4%
2	4	2.2%
1	0	0%
	184	

SHOPPING, ENTERTAINMENT, AND RESTAURANT OPTIONS

On a scale of 1 – 5, most Moorhead homebuyers surveyed rated Moorhead's shopping, entertainment, and restaurant options a '3.'

Shopping			Entertainment			Restaurant		
Rating	#	%	Rating	#	%	Rating	#	%
5	18	9.2%	5	7	3.8%	5	10	5.1%
4	53	27%	4	34	18.4%	4	41	20.9%
3	63	32.1%	3	77	41.6%	3	72	36.7%
2	46	23.5%	2	39	21.1%	2	45	23%
1	16	8.2%	1	28	15.1%	1	28	14.3%
	196			185			196	

6. What is your neighborhood's best attribute, amenity, or feature? The most common responses are listed in order below:

- 1) Near natural or recreational amenity (e.g., green space, water, golf course, pathways)
- 2) The neighbors (e.g., friendly, young families, few children, 55+ community)
- 3) Quiet and peaceful
- 4) Well established with mature trees
- 5) Connectivity within infrastructure/ease of access: I-24, HWY 10, major arterial streets

7. *Homebuyers in 2013 received a "Welcome Home Pass". Buyers of existing homes received a round of golf and buyers of newly constructed homes received an "all access" recreational pass.*

a) If you bought an existing home, did you use your free round of golf?

Yes - 22% (10 respondents)
No - 78% (38 respondents)

b) If you bought a newly constructed home, which free activities did you use? Choose all that apply.

Activity	Votes(#)
Golf	11
Recreation Programs	1
Swimming	3
<u>I did not use my pass</u>	<u>25</u>
	40

c) Now that you have tried Moorhead's recreational programs and services, what will you purchase/participate in again next season? Choose all that apply.

Activity	Votes(#)
Golf -season pass	19
Recreation Programs	8
Swimming -season pass	18
<u>I'm not sure</u>	<u>74</u>
<u>I will not purchase/participate next season</u>	<u>39</u>
	158

2013 was the first year of the Welcome Home program. More data will be collected to determine the value and cost of the program for residential recruitment and post purchase satisfaction.

8. *What would you say to other potential homebuyers about buying a home in Moorhead? The most frequently reported responses are listed in order below:*

- 1) Great neighborhoods and community, nice place to live
- 2) Better home value and quality than surrounding areas (e.g., larger homes/ lots for less cost)
- 3) Do it! Move to Moorhead!
- 4) Moorhead has a small town feeling with large town opportunities and amenities, it's quiet with great schools with school involvement, take your time looking, know your options, and do the math and comparisons
- 5) Tie: Income taxes are high; it's a great community for families

9. *Why did you buy in Moorhead? The most frequently reported responses are listed in order below:*

- 1) Wanted to live or stay in Minnesota or Moorhead
- 2) Affordability, better home value and quality than surrounding areas
- 3) Found the right house
- 4) Neighborhood and/or location, close to work, school, family, friends
- 5) School system

Appendix D: Quarterly Report on Apartment Vacancy and Construction in the Fargo-Moorhead MSA

QUARTERLY REPORT ON APARTMENT VACANCY AND CONSTRUCTION - FARGO-MOORHEAD METROPOLITAN AREA - Compiled by Appraisal Services, Inc. - September 1, 2014

Multi-family development continues to be strong with revolving construction of over 1,000 units for the fifth straight quarter. The following table was developed using data from the American Community Survey (ACS) to better estimate the supply of apartment units in the metro area.

The resulting total number of apartment units in Fargo-West Fargo-Moorhead-Dilworth via the 2012 ACS survey was 30,254. The table below indicates that 888 of the 1,278 units permitted in 2012 have been completed. A 330 unit facility on the east edge of West Fargo makes up the remainder of the 2012 projects that remain incomplete. As of September 1, approximately 1,239 of 1,644 units described in 2013 have been completed. Based on this information we estimate that the total number of apartment units available for occupancy as of September 1, 2014 was 32,581. Approximately 1,151 new units have come on-line since the beginning of 2014 with an additional 2,988 units being under construction as of September 1, 2014. An estimated 295 units have come online since June 1 of this year, all of them in the Fargo market. The individual community information is relayed in the following table.

FMS Metro Apartment Growth						
Year	Fargo	West Fargo	Moorhead	Dilworth	Other Towns	Total
July 1, Bldg Permits	741	12	134	5	0	877
2010 Bldg Permits	567	48	0	0	0	555
2011 Bldg Permits	681	96	66	0	0	839
2012 Bldg Permits	722	302	61	21	0	1,214
2012 Units Completed	733	72	63	21	0	946
2013 Units Permits	1,111	301	234	0	0	1,644
2013 Units Completed	971	200	232	0	0	1,234
Apres. Available Apartment Total						
West Fargo	24,270	3,066	4,111	362	0	32,581
SW Area Growth (Permits)	703	152	104	0	0	1,021
Completed Construction 7/14 - 9/14	815	200	316	0	0	1,151
Under Construction as of 9/14	1,390	394	981	0	0	1,644

*Estimated numbers available as of July 1, 2014. Data are preliminary and subject to revision.

We conducted a survey of 59 local apartment owners and managers with 100% response rate. The overall vacancy rate for the metro area was 3.68% for the 26,598 units surveyed, which is over 80% of the total estimated apartment market. The survey results are summarized below.

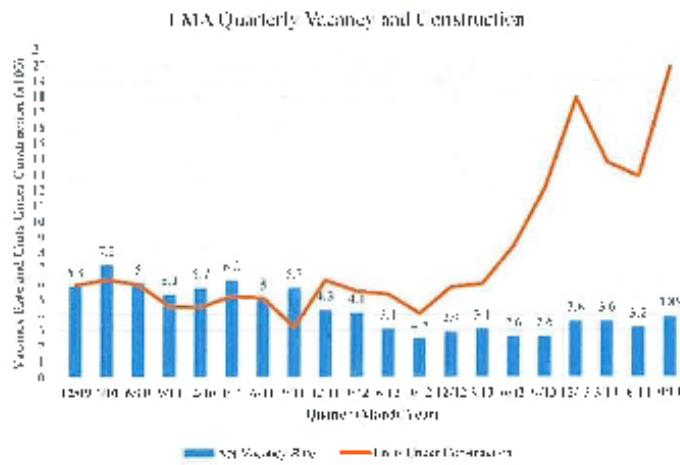
Survey Area	Units Surveyed	Percent Vacant				Average Annual Vacancy			
		WFLA	WFA	MLA	WFL	2013	2012	2011	2010
SE Fm Area 1	4,698	3.41	1.2	7.3	4.1	2.2	2.1	2.0	3.6
SE Fm Area 2	1,886	7.34	3.4	5.8	4.3	2.1	3.1	4.6	3.1
WFm Area 3	1,780	4.91	3.1	5.7	6.6	3.3	3.3	4.9	3.6
SE Fm Area 4	4,838	3.84	2.5	5.1	4.2	2.6	3.1	4.9	3.6
SE Fm Area 5	3,858	3.04	2.3	5.6	6.2	3.3	3.6	5.8	4.1
W. Fm Area	1,019	3.98	3.4	2.8	6.1	2.2	2.4	3.2	3.7
Total Fargo	20,040	3.36	2.0	5.5	4.0	2.7	2.9	4.7	3.4
West Fargo, ND	3,107	6.08	1.5	8.2	6.7	2.6	2.0	8.6	3.8
Moorhead, ND	3,280	5.08	4.5	6.1	5.6	3.0	5.2	7.2	3.0
Dilworth, ND	181	2.09	6.5	6.4	9.2	4.5	6.3	6.0	3.5
Total	26,598	3.66	2.5	5.7	5.3	2.9	3.2	5.5	4.0

This survey measures physical vacancy and does not consider rental incentives, delinquencies and lost rent from skips which are also part of the true vacancy picture. The vacancy rate would be higher if the impact of rental incentives and tenants vacating prior to lease expiration was considered. It is difficult to quantify the economic vacancy factor, based on the scope of our survey.

The overall 3.86% vacancy condition indicates that demand all appears to be outpacing the existing supply in the metro area. The metro vacancy rate has increased 1.3% since this time last year, and is up 0.6% from the June 1, 2014 survey. We anticipate that the vacancy rate will continue to slowly trend upward with the expectation of another 500 new units coming to market by the end of this year.

Rental rates have been experiencing increases over the last two years as demand outpaced supply. Developers responded by taking out permits for over 2,800 units in 2012-2013. Thus far, in 2014, developers have acquired permits for 1,816 new apartment units. The new construction may result in supply outpacing demand in some portions of the market, resulting in flat or declining rental rates. Additionally, rental incentives continue to return in an effort to accelerate lease-up in new buildings.

The graph below provides a picture of the relationship between the metro area vacancy rate and apartment units under construction over the last four years. Owners and property managers offer better rates for yearlong leases, diminishing seasonal vacancy spikes associated with the college student population. More of the market is being occupied by young professionals who opt to rent rather than own, a trend being observed nationwide.

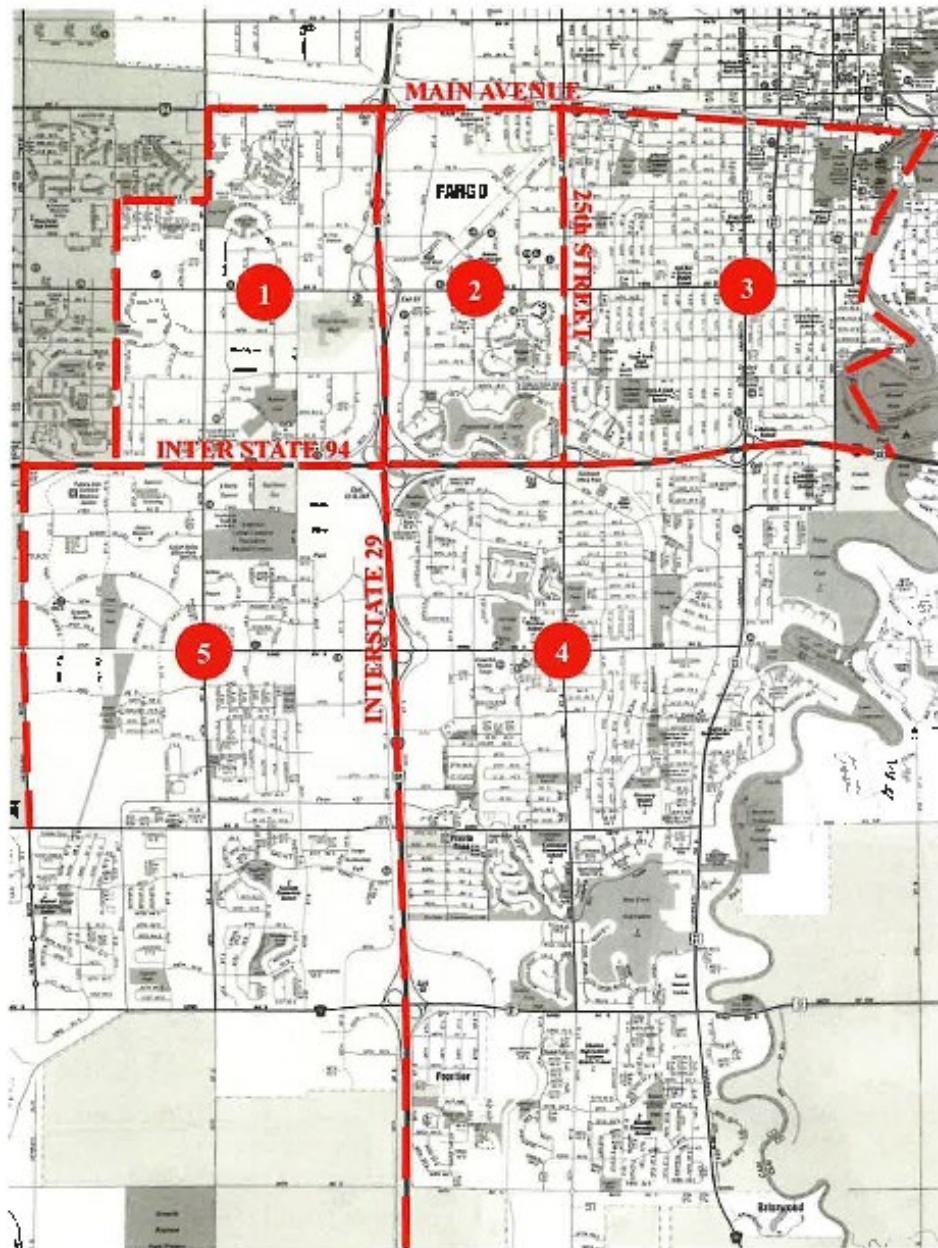


The multi-family rental market is the strongest it has been in a decade. Healthy state and local economies accelerated in-migration following the 2008 economic downturn. Strong education and healthcare sectors coupled with one of the lowest costs-of-living in the country also factor into the metro area growth rate. A recent presentation on population trends from the North Dakota Department of Commerce estimated that the population of Fargo alone has grown by over 13,000 residents since April of 2010.

Low mortgage interest rates, high occupancy levels and increasing population have been responsible for the aggressive apartment construction. It remains to be seen whether the recent boom in construction will overbuild the market or simply satisfy demand. Apartment sales activity continues to be strong, with multiple parties bidding on apartments offered for sale.

Peter N. Eriksmoen – Appraisal Services, Inc.

¹ For information about the ACS visit census.gov/acs



Appendix Table A: Population Chart 1990-2013

Population	1990 Census (overall %)	2000 Census (overall %)	2010 Census (overall %)	2013 Estimate (overall %)	2000 to 2010 Growth Rate %
Total	32,295	32,177	38,065	39,082	1.8 ↑
White	30,786 (95.3%)	29,628 (92.1%)	34,530 (90.7%)	35,546 (91%)	1.7 ↑
Black or African American	152 (0.5%)	247 (0.8%)	775 (2%)	690 (1.8%)	21.4 ↑
American Indian or Alaska Native	441 (1.4%)	625 (1.9%)	580 (1.5%)	418 (1.1%)	-0.7 ↓
Asian	355 (1.1%)	410 (1.3%)	758 (2%)	678 (1.7%)	8.5 ↑
Native Hawaiian or Other Pacific Islander	-	14 (<.01%)	17 (<.01%)	32 (<.01%)	2.1 ↑
Some other race	561 (1.7%)	676 (2.1%)	416 (1.1%)	318 (0.8%)	-3.8 ↓
Two or more races		577 (1.8%)	989 (2.6%)	1,400 (3.6%)	7.1 ↑
Hispanic or Latino of any race	890 (2.8%)	1,439 (4.5%)	1,576 (4.1%)	1,870 (4.8%)	1.0 ↑

Data retrieved on November 28, 2014 from www.census.gov.

Appendix Table B: 2013 Conventional Home Purchase Loans by Race & Gender

Race or Ethnicity	Number of Conventional Home Purchase Loans Originated by Gender/Joint/Income					
	Total	Male	Female	Joint (Male/Female)	0-79% of MSA Median Income	80% or greater of MSA Median Income
American Indian/Alaska Native	5	2	3	0	1	4
Asian	42	22	6	14	9	33
Black or African American	9	6	2	2	5	4
Native Hawaiian/Other Pacific Islander	1	1	0	0	0	1
White	2707	671	463	1573	809	1,818
2 or More Minority Races	1	1	0	0	0	1
Joint (White/Minority Race)	21	0	1	20	2	18
Race Not Available	225	5	6	12	17	42
Hispanic or Latino	19	10	5	4	11	8
Not Hispanic or Latino	2751	694	470	1586	814	1,486
Joint (Not Hispanic or Latino/Hispanic or Latino)	17	0	0	17	2	14
Ethnicity Not Available	224	4	5	14	16	42

(Home Mortgage Disclosure Act HMDA 2013 data for Fargo Moorhead Metropolitan Statistical Area – MSA, retrieved on December 3, 2014 from <http://www.ffcic.gov/hmda/>)⁷

⁷ In some instances, the total female, male, and joint counts do not add up to category totals provided by HMDA.

Appendix Table C: 2013 FHA, FSA/RHS, and VA Home Purchase Loans by Race & Gender

Race or Ethnicity	Number of FHA, FSA/RHS, and VA Home Purchase Loans Originated by Gender/Joint/Income					
	Total	Male	Female	Joint (Male/~female)	0-79% of MSA Median Income	80% or greater of MSA Median Income
American Indian/Alaska Native	6	2	2	2	2	4
Asian	1	2	1	1	4	0
Black or African American	15	7	5	3	13	2
Native Hawaiian/Other Pacific Islander	2	1	0	1	2	0
White	1027	362	192	471	545	460
2 or More Minority Races	1	1	0	0	1	0
Joint (White/ Minority Race)	19	0	0	19	5	13
Race Not Available	19	4	2	5	9	10
Hispanic or Latino	12	4	5	3	7	4
Not Hispanic or Latino	1059	372	196	490	567	470
Joint (Not Hispanic or Latino/ Hispanic or Latino)	5	0	0	5	0	5
Ethnicity Not Available	17	3	1	4	7	10

(Home Mortgage Disclosure Act –HMDA 2013 data for Fargo-Moorhead Metropolitan Statistical Area – MSA, retrieved on December 3, 2014 from <http://www.ffcic.gov/hmda/>)⁸

⁸ In some instances, the total female, male, and joint counts do not add up to category totals provided by HMDA.

Appendix Table D: 2009-2013 Conventional, FHA, FSA/RHS, and VA Home Purchase Loans by Race for all Income Levels

Race or Ethnicity	2009	2010	2011	2012	2013
American Indian/Alaska Native	15 (<1%)	6 (<1%)	6 (<1%)	10 (<1%)	11 (<1%)
Asian	39 (>1%)	17 (<1%)	21 (<1%)	34 (1%)	46 (>1%)
Black or African American	8 (<1%)	12 (<1%)	10 (<1%)	21 (<1%)	24 (<1%)
Native Hawaiian/Other Pacific Islander	1 (<1%)	1 (<1%)	2 (<1%)	2 (<1%)	3 (<1%)
White	2,969 (97%)	2,627 (98%)	2,396 (98%)	3,150 (97%)	3,734 (97%)
2 or More Minority Races	0	0	0	1 (<1%)	2 (<1%)
Hispanic or Latino	22 (<1%)	17 (<1%)	11 (<1%)	16 (<1%)	31 (<1%)

[Home Mortgage Disclosure Act – HMDA 2013 data for Fargo-Moorhead Metropolitan Statistical Area – MSA, retrieved on December 3, 2014 from <http://www.ffcic.gov/hmda/>]



Analysis of Impediments to Fair Housing Choice
January 2015

City of Moorhead
500 Center Avenue
PO Box 770
Moorhead, MN 56561

2015 Analysis of Impediments

Moorhead, Minnesota

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If you feel you have experienced discrimination in the housing industry,
please contact:

Fair Housing Regional Office for Minnesota
Chicago Regional Office of Fair Housing Equal Opportunity (FHEO)
U.S. Department of Housing and Urban Development
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard, Room 2101
Chicago, Illinois 60604-3507
(312) 353-7776 ext. 2453
(800) 765-9372
TTY (312) 353-7143

Minneapolis HUD Field Office
International Centre
920 Second Avenue South, Suite 1300
Minneapolis, Minnesota
55402-1012
Telephone: (612) 370-3000
TTY (612) 370 3186

Minnesota Department of Human Rights
Freeman Building
625 Robert Street North
St. Paul, Minnesota 55155
Phone: 651 539-1100
MN Relay: 711 or 1-800-677-3524
Toll Free: 1-800-657-3704
Fax: (651) 296-9042
Email: Info.DDHR@state.mn.us

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Analysis of Impediments to Fair Housing Choice

Introduction

The Fair Housing Act prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, handicap, or familial status. The Fair Housing Act further requires the U.S. Department of Housing and Urban Development to administer the programs and activities relating to housing and urban development in a manner to affirmatively further the policies of the Fair Housing Act.

Moorhead's Analysis of Impediments to Fair Housing Choice is an effort to identify impediments to fair housing choice as they may exist within the jurisdiction and control of the City of Moorhead.

Impediments to fair housing choice are defined as actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices; or actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Barriers to affordable housing are distinct from impediments to fair housing choice. As instructed by HUD, impediments to fair housing choice are analyzed without regard to income or affordability. Affordability issues are reviewed within the Consolidated Plan for Housing and Community Development. Moorhead's Analysis of Impediments to Fair Housing Choice (the Analysis) is a review of impediments to fair housing choice in the public and private sector, involving:

"a comprehensive review of laws, regulations, and administrative policies, procedures, and practices; an assessment of how these regulations affect the location, availability, and accessibility of housing; and an assessment of conditions, public and private, affecting fair housing choice."

The Analysis is required by the U.S. Department of Housing and Urban Development as a condition of receipt of Community Development Block Grant funds. The City of Moorhead certifies in its 2015-2019 Consolidated Plan for Housing and Urban Development that it will fulfill the following obligations:

1. Conduct an analysis of impediments to fair housing choice;
2. Prepare a description of any steps taken to carry out the certification; and
3. Maintain evidence to support the certification.

The Planning & Neighborhood Services Department of the City of Moorhead is the lead agency in the Consolidated Plan and Fair Housing Planning requirements. Requests for information and comments may be addressed to:

City of Moorhead - City Hall
Planning & Neighborhood Services Department
Attn. Community Development Program Administrator
500 Center Avenue, 4th Floor
PO Box 779
Moorhead MN 56560
Phone: (218) 299-5434 (voice/TPD)

A coordinated effort of all organizations working in housing and community development will be needed to overcome impediments to fair housing. As the implementation of the Consolidated Plan is a joint effort of the citizens, the City, neighborhood groups, businesses, and community organizations, this same coordinated effort will be needed to assure fair housing choice in Moorhead.

Changing conditions require ongoing examination of fair housing problems, and other housing and community development issues. The process of fair housing planning and analysis of impediments to fair housing will continue in Moorhead. To the extent that additional impediments to fair housing choice are identified, additional actions will be recommended to overcome the effects of the impediments.

Community Background

Demographics: Moorhead's population is 32,177 persons (Census 2000). This is a slight (-0.37%) decrease from 1990 (32,295). The decrease has been determined to be largely attributable to declines in college enrollment.

Moorhead is a border city to Fargo, North Dakota. Fargo's 2000 population was 90,599. Fargo's rate of growth from 1990 - 2000 was 22%. Growth has significantly increased within the City of Moorhead as the community has experienced record breaking housing starts for the past four years. Fargo continues to grow at a faster rate than Moorhead. Minnesota State University Moorhead, Concordia College, and Northwest Technical College attract more than 10,000 students to the community. Moorhead is the largest city in Clay County and the county seat, providing state and county government services.

While a relatively small proportion of Moorhead's total population is of a racial minority status (8%), the growth in racial minority population classifications continues to increase (from 4% in 1990 to 8% in 2000). Moorhead's minority population grew by a total of 1,040 and the nonminority population decreased by 1,158 from 1990 to 2000.

Population	1990 Census	2000 Census	% of Total 2000 Census	%Change
White	30,786	29,628	92.08	-3.76
Black or African American	152	247	0.77	62.50
Asian Indian or Native Alaskan	441	625	1.94	41.72
Asian	355	424	1.32	19.44
Some other race	561	676	2.10	20.50
Two or more races		577	1.79	NA
Hispanic or Latino (of any race)	890	1439	4.47	61.69
Total Population	32,295	32,177		-0.37

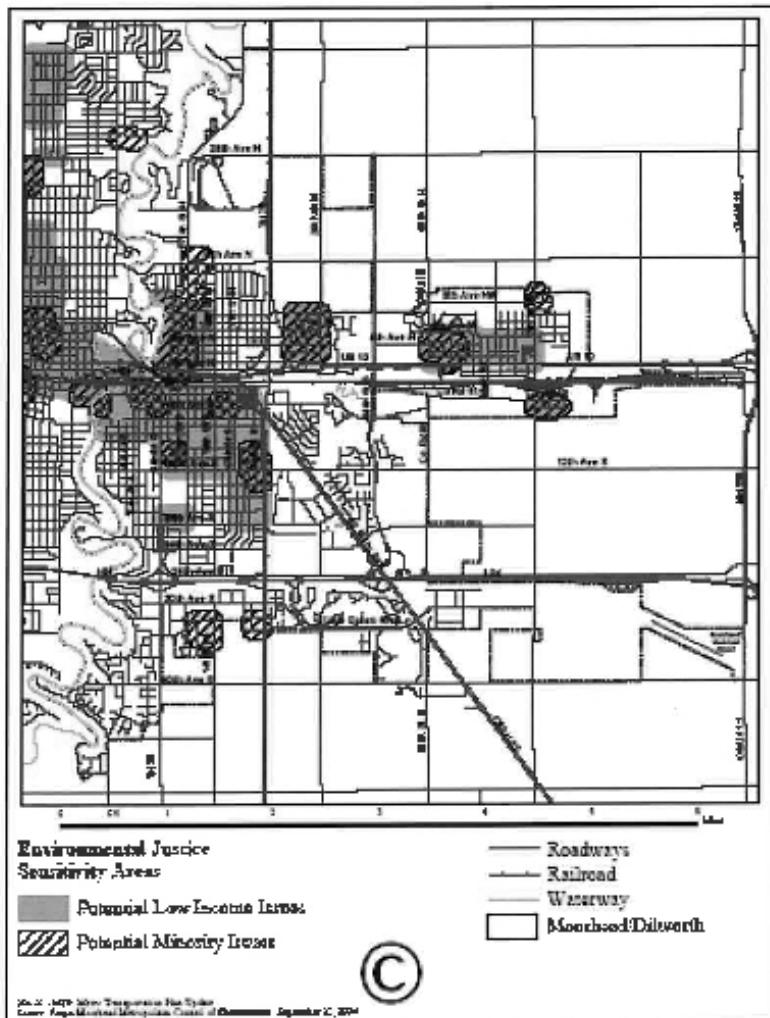
Foreign born residents increased from 816 in 1990 to 1,095 in 2000. The increase in foreign-born residents living in Moorhead who entered the country during the previous decade increased by 241 persons from 1990 to 2000.

As of Census 2000, there were 1,633 households in Moorhead with a household member having a mobility or self care limitation that would constitute a disability. Of these households, 719 include persons who are age 65 or older.

Housing stock: Moorhead's housing stock consisted of 11,651 occupied units as of Census 2000. Rental units comprise 4,228 (36%) of the total housing units and 7,426 (64%) are owner occupied. During the 1990s, a total of 1,425 units were built and 749 were demolished or moved. Demolition was precipitated by Red River flood damage, age/condition of units, and redevelopment projects. Since 2000, 1,010 housing units have been added to the housing stock. Rental housing was 36.3% of the total occupied housing stock (Census 2000).

According to Appraisal Services Inc., the 2003 annual apartment vacancy rate in Moorhead was 7.0 percent, which is near the average vacancy rate for the Fargo-Moorhead metropolitan area (6.7%). During the period 1997 to 2001, an average of 38 multifamily units per year were constructed; however, during the three year period 2002 – 2004, the average has increased dramatically to 169 per year. Single family home construction has also seen a significant increase during the most recent three-year period to 228 units per year, up from approximately 84 units per year from the preceding five-year period.

F-M Metropolitan Council of Governments has reviewed Census 2000 information to document areas of the metropolitan area in which the minority population is at least 25% of the total population within the block. The same standard was applied to low-income populations, indicating households at 1.24 or less of poverty level.



Analysis of Impediments

Macrhead, Minnesota

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Analysis of Impediments

This component of the Analysis focuses on potential market, governmental, and environmental Impediments to fair housing choice existing within the City of Moorhead and within the control of the City of Moorhead, based upon self-identification, identification by citizens and advocacy groups, and state and federal agencies. Actions to further fair housing by addressing each of these concerns are also included.

Access to Homeownership Opportunity.

As is a problem nationally, homeownership rates are lower among minority households in Moorhead. The CHAS Data Book (2000) reports the following homeownership statistics by household classification:

Household Classification	Total Households	Homeownership Rate Total for Classification	Homeownership Rate 80% MFI or greater
Asian Non-Hispanic	36	39%	89%
Pacific Islander Non-Hispanic	4	100%	100%
Black Non-Hispanic	46	52%	100%
Hispanic	330	39%	81%
Native American Non-Hispanic	136	28%	60%
White Non-Hispanic	10,720	66%	89%
Mobility or Self-care Limitation (including elderly)	1,633	55%	80%
Mobility or Self-care Limitation (excluding elderly)	914	52%	80%

Homeownership rates overall are lower for nearly all households within racial minority categories and households with mobility or self-care limitations than for White Non-Hispanic households. However, when controlled for income, homeownership rates significantly increase for all household classifications reviewed as noted in the last column, reflecting only those households with incomes at or above 80% median family income.

Response: While it does not appear that access to homeownership is a significant impediment to fair housing choice at moderate income or above, there is a greater variance when controlled for income. It is recognized that homeownership is an important component of a household's financial stability and wealth generation, and the City of Moorhead must work to maintain availability of its affordable single and multifamily housing units, increase the supply of such units and affirmatively market the availability of down payment assistance and homebuyer education opportunities to persons of protected classes.

The City of Moorhead will continue to affirmatively market the availability of homeownership opportunities to organizations serving a significant proportion of racial minority households and those with disabilities. In 2004, the City worked with a metropolitan collaborative to hold a homebuyer education seminar at Centro Cultural, marketing to the Hispanic community. While the seminar was not well attended, the City will look for future opportunities to expand such offerings and increase attendance.

2005-2008 Action Steps:

- Annually distribute housing opportunities (education, down payment assistance, and low mortgage financing) information to all metropolitan organizations serving persons of protected classes.
- Annually conduct one homeownership event targeted to persons of protected classes.

Availability of Accessible Housing for Persons with Disabilities.

There is no local, state, or federal requirement for single family housing to be constructed to meet the accessibility needs of households with a household member with a disability. Two percent of units in 8 or more unit, multifamily developments must be accessible as required by the Minnesota State Building Code. Two-level townhomes are exempt from this restriction, however, assistance through CDBG requires adherence to Section 504 regulations, requiring 5 percent (at least 1) for persons with mobility impairments and 2 percent (at least one) for persons with vision or hearing impairments.

The City of Moorhead surveyed residents regarding the difficulty of finding accessible housing in 1999 and 2004. In 1999, 18.9% of respondents reported problems finding accessible housing (23.1% of renters and 13.8% of owners). In 2004, the response rate decreased to 15.3% overall (17.2% of renters and 11.1% of owners).

Response:

While single family homes are not required to be constructed to accessibility standards, the City of Moorhead will finance accessibility improvements through its single family rehabilitation program. Accessibility renovations will be given emergency priority status for purposes of the waiting list for the program. This program is limited to persons at or below 60% of median income. The City has a partnership with the Lutheran Church of the Good Shepherd volunteer carpenters to provide materials for free ramps for households earning below 80% median income. Households exceeding 80% median income would be required to seek their own financing for accessibility renovations.

Moorhead and the State of Minnesota adopted revised accessibility standards for new construction on January 23, 1996. The standards require residential dwellings, with the exception of owner-occupied units, to have accessible entrances and common areas. Apartment buildings with seven or more units must provide two percent or at least one accessible unit. Similar standards apply to hotels, dormitories, and congregate residences. The City of Moorhead requires multifamily new construction conform with the accessibility requirements of the Minnesota State Building Code. Any project financed through CDBG will adhere to Section 504 requirements.

2005-2008 Action Steps:

- * Annually distribute information on accessibility renovation information to all metropolitan organizations serving persons with disabilities.
- * Continue to enforce requirements of Minnesota Building Code and Section 504 legislation.

Land Use/Regulatory Barriers:

Group homes, emergency shelter, and transitional housing facilities are permitted within all of Moorhead's residential zoning districts. Maximum occupancy is based upon facility size to ensure public safety. Occupancy limitations are applied uniformly to multiple resident facilities.

A further review of regulatory barriers has been derived from HUD Form 27300, "Questionnaire for HUD's Initiative on Removal of Regulatory Barriers."

1. Does your jurisdiction's comprehensive plan include a "housing element"? A local comprehensive plan means the adopted official statement of a legislative body of a local government that sets forth (in words, maps, illustrations, and/or tables) goals, policies, and guidelines intended to direct the present and future physical, social, and economic development that occurs within its planning jurisdiction and that includes a unified physical plan for the public development of land and water. Yes, the City of Moorhead Comprehensive Plan as adopted in 2004 contains a housing element.
2. If your jurisdiction has a comprehensive plan with a housing element, does the plan provide estimates of current and anticipated housing needs, taking into account the anticipated growth of the region, for existing and future residents, including low, moderate and middle income families, for at least the next five years? Yes, the City of Moorhead Comprehensive Plan does contain growth estimates, based upon a Housing Market Analysis published in January 2004.
3. Does your zoning ordinance and map, development and subdivision regulations or other land use controls conform to the jurisdiction's comprehensive plan regarding housing needs by providing: a) sufficient land use and density categories (multifamily housing, duplexes, small lot homes and other similar elements); and, b) sufficient and zoned or mapped "as of right" in these categories, that can permit the building of affordable housing addressing the needs identified in the plan? (For purposes of this notice, "as-of-right," as applied to zoning, means uses and development standards that are determined in advance and specifically authorized by the zoning ordinance. The ordinance is largely self enforcing because little or no discretion occurs in its administration.). If the jurisdiction has chosen not to have either zoning, or other development controls that have varying standards based upon districts or zones, the applicant may also enter yes. Yes, the City of Moorhead Comprehensive Plan provides for a variety of density categories and the building of affordable housing identified within the Comprehensive Plan.

4. Does your jurisdiction's zoning ordinance set minimum building size requirements that exceed the local housing or health code or is otherwise not based upon explicit health standards? No, Moorhead's Zoning Ordinance does not set minimum building size requirements exceeding the local housing or health code.
5. If your jurisdiction has development Impact fees, are the fees specified and calculated under local or state statutory criteria? If no, skip to question #7. Alternatively, if your jurisdiction does not have impact fees, you may enter yes. Yes, charges are specified under local criteria based upon structure value.
6. If yes to question #5, does the statute provide criteria that sets standards for the allowable type of capital investments that have a direct relationship between the fee and the development (nexus), and a method for fee calculation? Yes.
7. If your jurisdiction has impact or other significant fees, does the jurisdiction provide waivers of these fees for affordable housing? No. (Not applicable to fair housing)
8. Has your jurisdiction adopted specific building code language regarding housing rehabilitation that encourages such rehabilitation through graduated regulatory requirements applicable as different levels of work are performed in existing buildings? Such code language increases regulatory requirements (the additional improvements required as a matter of regulatory policy) in proportion to the extent of rehabilitation that an owner/developer chooses to do on a voluntary basis. For further information see HUD publication: "Smart Codes in Your Community: A Guide to Building Rehabilitation Codes" (www.huduser.org/publications/destech/smartercodes.html) No, requirements are applied uniformly.
9. Does your jurisdiction use a recent version (i.e. published within the last 5 years or, if no recent version has been published, the last version published) of one of the nationally recognized model building codes (i.e. the International Code Council (ICC), the Building Officials and Code Administrators International (BOCA), the Southern Building Code Congress International (SBCI), the International Conference of Building Officials (ICBO), the National Fire Protection Association (NFPA)) without significant technical amendment or modification. Yes, the City of Moorhead uses the 2003 Minnesota State Building Code, which includes the requirements of a national building code, the International Building Code, 2000 edition. However, with respect to accessibility requirements, the Minnesota State Building Code adheres to a greater standard than the International Building Code.
10. Does your jurisdiction's zoning ordinance or land use regulations permit manufactured (HUD-Code) housing "as of right" in all residential districts and zoning classifications in which similar site-built housing is permitted, subject to design, density, building size, foundation requirements, and other similar requirements applicable to other housing that will be deemed reality, irrespective of the method of production? Yes, manufactured housing is permitted in all residential districts and zoning classifications.

11. Within the past five years, has a jurisdiction official (i.e., chief executive, mayor, county chairman, city manager, administrator, or a tribally recognized official, etc.), the local legislative body, or planning commission, directly, or in partnership with major private or public stakeholders, convened or funded comprehensive studies, commissions, or hearings, or has the jurisdiction established a formal ongoing process, to review the rules, regulations, development standards, and processes of the jurisdiction to assess their impact on the supply of affordable housing? Yes, the Mayor convened the Moorhead Housing Task Force in 2001 and their analysis involved interviews with citizens, developers, builders, lenders, realtors, and advocacy groups. The Moorhead Housing Task Force Report was issued in 2002. These issues were also reviewed by a citizen task force during the 2004 Comprehensive Plan Update.

12. Within the past five years, has the jurisdiction initiated major regulatory reforms either as a result of the above study or as a result of information identified in the barrier component of the jurisdiction's "PUD Consolidated Plan"? If yes, attach a brief list of these major regulatory reforms. The following reforms were implemented upon issuance of the Moorhead Housing Task Force Report:

- Adopted the Planning Commission recommendation to review the Future Land Use Map for additional medium density and high density residential classifications
- Adopted the recommendation of the Planning Commission to revise the Comprehensive Plan's residential land use classification to encourage greater diversity in neighborhoods
- Identified and extended infrastructure to locations appropriate for development of medium and high density housing as established by the Planning Commission.

13. Within the past five years has your jurisdiction modified infrastructure standards and/or authorized the use of new infrastructure technologies (e.g. water, sewer, street width) to significantly reduce the cost of housing? No, density bonuses are offered by the City of Moorhead. (Not applicable to fair housing)

14. Does your jurisdiction give "as-of-right" density bonuses sufficient to offset the cost of building below market units as an incentive for any market rate residential development that includes a portion of affordable housing? (As applied to density bonuses, "as of right" means a density bonus granted for a fixed percentage or number of additional market rate dwelling units in exchange for the provision of a fixed number or percentage of affordable dwelling units and without the jurisdiction's discretion in determining the number of additional market rate units.) No, infrastructure standards have not been modified. (Not applicable to fair housing)

15. Has your jurisdiction established a single, consolidated permit application process for housing development that includes building, zoning, engineering, environmental, and related permits? Alternatively, does your jurisdiction conduct concurrent, not sequential, reviews for all required permits and approvals? Yes, the City conducts a sequential review for permits and approvals.

16. Does your jurisdiction provide for expedited or "fast track" permitting and approvals for all affordable housing projects in your community? No, all permits are given equal priority.

17. Has your jurisdiction established time limits for government review and approval or disapproval of development permits in which failure to act, after the application is deemed complete, by the government within the designated time period, results in automatic approval? Yes, if no action is taken on a permit, the City gives automatic approval 60 days after a complete application is received, in compliance with Minnesota Statutes.

18. Does your jurisdiction allow "accessory apartments" either as: a) a special exception or conditional use in all single family residential zones or, b) "as of right" in a majority of residential districts otherwise zoned for single-family housing? No, accessory apartments are not permitted.

19. Does your jurisdiction have an explicit policy that adjusts or waives existing parking requirements for all affordable housing developments? No, parking requirements are consistently applied.

20. Does your jurisdiction require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations? No special hearings are required unless the project is receiving public assistance, in which cases the terms of citizen participation/public notice are governed by the funding source requested.

Response: This review of regulatory barriers does not identify impediments to fair housing choice.

2005-2008 Action Steps:

- The City of Moorhead will continue to review regulatory barriers annually.

Reports of Discrimination.

The Community Development Survey conducted by the City of Moorhead in 2004 and 2014 asked respondents to indicate whether housing discrimination was a current, significant problem for them. The response rate declined significantly over the five year period, from 23.1% in 1999 to 13.6% in 2004. Both owners and renters statistics improved:

Housing Discrimination reported as a serious or very serious problem.

2004			1999		
Total	Renters	Owners	Total	Renters	Owners
13.0%	17.2%	3.7%	23.1%	20.1%	8.2%

Legal Services of Northwest Minnesota indicates that fair housing complaint filings have increased. Those two factors combined (feelings of discrimination decreased, filings increased) suggest that the advocacy efforts of community organizations and public education regarding discrimination are proving effective.

Response: There are numerous organizations and initiatives underway in Moorhead that educate and/or advocate fair housing rights for residents and fair housing responsibilities for providers of housing:

- **Moorhead Human Rights Commission:** recommending board to the City Council and a resource to the community for human rights education and resolution of human rights issues.
- **Cultural Diversity Resources:** nonprofit organization working with New Americans and recent immigrants on self-sufficiency; also has established a Human Rights Center for community education and advocacy
- **Uniting for Equality:** a collaborative of Fargo-Moorhead organizations focused on achieving inclusive community goals regarding education, housing and public safety, income and employment, and recreation and sports
- **Justice Circle:** group of community citizens engaged in community organizing, education, and advocacy for the purpose of enhancing equal opportunity and promoting racial and ethnic justice
- **Legal Services of Northwest Minnesota:** Nonprofit organization offering legal services to low income persons in the community, including housing related legal issues
- **Village Financial Resource Center Homebuyer Education and Tenant Education Programs:** Nonprofit organization that provides free classes to persons interested in purchasing homes and to renters interested in learning more about their rights and responsibilities as tenants. Tenant Education has become a requirement for persons applying for public housing in Cass and Clay Counties.
- **Moorhead Crime Free Multi Housing Program:** Offered by the Moorhead Police Department as part of a certification program for rental properties; includes a fair housing component as part of the landlord training.

The number of organizations and their various constituencies working toward mutual goals strengthens the community's outreach on fair housing issues.

2005-2008 Action Steps:

- Continue relationships with these and other organizations concerned with fair housing rights.
- Continue to participate financially in the provision of tenant and homebuyer education and the crime-free multi housing program.

Language barriers. The inability to communicate and comprehend English can be a significant barrier to housing and other life necessities. The Fargo-Moorhead community has seen a significant increase in the number of languages spoken with the relocation of many New Americans and refugees from around the world. Interpreters are often needed to assist with navigating the systems of education, housing, medical care, and other services.

Response: Specifically related to housing, tenant education is offered in many languages besides English, including Spanish, Kurdish, Bosnian, Creole, Arabic, and Somali in 2004. Homebuyer education is offered with interpreter services upon request, and the Cities of Fargo and Moorhead have begun offering up to 10 free hours of interpreter services for realtor and lender interactions to limited English speaking persons who have completed homebuyer education.

2005-2008 Action Steps:

- Continue to encourage and participate financially in the provision of interpreter services for housing activities.

Conclusion

The City of Moorhead, through the Mayor and City Council, volunteer boards and commissions, and staff are making persistent, significant efforts to affirmatively further fair housing with the involvement of many individuals and organizations in the community. The City of Moorhead will continue to comply with the requirements of the Fair Housing Act by preventing discrimination as it provides housing assistance to any person because of race, color, religion, sex, national origin, handicap or familial status. The City of Moorhead will continue to affirmatively further fair housing through fair housing planning and analysis to identify impediments to fair housing choice within the jurisdiction. Based on the results of this continued analysis, the City of Moorhead will take appropriate actions to overcome the effects of any additional impediments identified, and maintaining records reflecting the analysis and actions in this regard.

Appendix A**Community Survey Results –Community Development Block Grant**

A total of 199 surveys were completed from August 15-31, 2014. The survey was available on the City of Moorhead's website and paper copies were distributed at various agencies throughout Moorhead. Results to housing-specific questions are provided below:

In your opinion, what are the 4 most important housing needs in Moorhead? Total votes = 1968

Housing Needs	Percentage of Votes	Number of Votes
Affordable Rental Housing	18%	352
Affordable Housing for Purchase	16%	309
Energy Efficiency Improvements	14%	280
Home Rehabilitation	13%	264
Homeowner Assistance	12%	227
Senior Housing	10%	187
Housing for Disabled Persons	9%	181
Fair Housing Education	8%	164

How often do you think housing discrimination occurs in Moorhead? Total votes= 489

Frequency	Percentage of Votes	Number of Votes
Never	2%	11
Rarely	16%	79
Sometimes	53%	260
Often	24%	119
Always	4%	20

Have you ever experienced housing discrimination in Moorhead? Total votes = 496

Response	Percentage of Votes	Number of Votes
Yes	13%	61
No	87%	432

If you answered YES: Who do you believe you discriminated against you (choose all that apply)? Total votes = 86

Person or Agency	Percentage of Votes	Number of Votes
Landlord	70%	60
Real Estate Lender	10%	9
Mortgage Lender	6%	5
Other	14%	12

Other includes staff, rental agency/manager, maintenance personnel, police officer, and homeless shelter.

What are the reasons you were discriminated against? Total votes = 141

Protected Classes in Minnesota	Percentage of Votes	Number of Votes
Receipt of Public Assistance	26%	37
Race	18%	26
Familial Status	12%	17
Physical or Mental Disability	10%	14
Color	9%	13
National Origin	6%	9
Marital Status	6%	8
Sexual Orientation	5%	7
Religion	4%	6
Sex	3%	4
Creed	2%	3
Age	1%	1

Did you report the incident? Total votes = 73

Response	Percentage of Votes	Number of Votes
Yes	14%	10
No	86%	63

If YES, to whom did you report the incident? Total votes = 28

Person or Agency	Percentage of Votes	Number of Votes
Business Owner/Manager	18%	5
Elected Official	7%	2
Moorhead Human Rights Commission	14%	4
MN Dept. of Human Rights	12%	4
HUD	21%	6
Other	25%	7

Other included a fair housing authority (Unknown agency, possibly HUD's Fair Housing and Equal Opportunity), supervisors, homeless shelter director, the City, and a VA Social Worker.

If NO, why didn't you report it? Total votes = 101

Reason	Percentage of Votes	Number of Votes
Afraid of retaliation	12%	12
Don't believe it makes a difference	39%	39
Don't know where to report it	30%	30
Too much trouble	12%	11
Other	9%	9

Other included waiting to report it and found another place to live.

Demographic Information

Are you a Moorhead resident? Total votes = 490

Response	Percentage of Votes	Number of Votes
Yes	75%	366
No	25%	124

Current Housing Status Total votes = 484

Status	Percentage of Votes	Number of Votes
Renter	43%	209
Homeowner	52%	252
Homeless	5%	23

How many people live in your home? Total votes = 475

Number of People	Percentage of Votes	Number of Votes
0	1%	4
1	23%	111
2	30%	142
3	17%	83
4	11%	51
5	8%	38
6	2%	9
7	1%	4
8	1%	3
9-12	0%	0
13	0%	2

How many of those are children under 18? Total votes = 399

Number of People	Percentage of Votes	Number of Votes
1	15%	60
2	18%	70
3	8%	33
4	7%	27
5	1%	4
6	1%	3

What is your age? Total votes = 468

Age	Percentage of Votes	Number of Votes
Under 13 years old	0%	1
13-17	0%	0
18-24	13%	62
25-34	25%	115
35-44	21%	100
45-54	18%	82
55-64	14%	65
65-74	6%	28
75-84	4%	17
85 years or older	1%	4

What is your annual household income? Total votes = 468

Income	Percentage of Votes	Number of Votes
\$0-\$21,650	32%	152
\$21,651-\$36,050	13%	61
\$36,051-\$57,700	16%	75
\$57,701-\$72,100	13%	60
\$72,101+	26%	120

What is your race (choose all that apply)? Total votes = 506

Race	Percentage of Votes	Number of Votes
White	86%	435
African American/Black	3%	14
Asian	1%	3
American Indian/Alaska Native	4%	21
Native Hawaiian/Other Pacific Islander	0%	1
Other Multi-Racial	4%	20

Are you Hispanic or Latino? Total votes = 470

Response	Percentage of Votes	Number of Votes
Yes	5%	22
No	95%	448

Grantee SF-424's and Certification(s)

RESOLUTION 2024-0108-K

Resolution to Approve Submission of 2024 CDBG Annual Action Plan

WHEREAS, the City of Moorhead receives Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, in compliance with federal regulations and consistent with its Five-Year Consolidated Plan for Housing and Community Development (2020-2024), the City of Moorhead has prepared its 2024 Annual Action Plan as a guide for investment of CDBG and other housing community development resources that may be available to address the needs of low to moderate income persons in Moorhead; and

WHEREAS, the City of Moorhead has conducted a citizen participation process including publication of a draft 2024 Annual Action Plan, community public meeting, public hearing and 30-day comment period; and

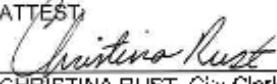
WHEREAS, since the draft 2024 Action Plan was published for public comment on November 28, 2023, the following modification was proposed and discussed at the public hearing on December 11 2023: \$25,000 allocated to Habitat for Humanity for costs associated with land acquisition for affordable housing construction, and an associated reduction to Single Family Home Rehabilitation funding by \$25,000.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Moorhead, Minnesota that the Mayor and City Manager are herein authorized and directed to submit the 2024 Annual Action Plan to HUD and enter into and execute contracts and other documents necessary to effectuate activities identified in the 2024 Annual Action Plan.

PASSED: January 8, 2024 by the City Council of the City of Moorhead.

APPROVED BY:

MICHELLE (SHELLY) A. CARLSON, Mayor

ATTEST:

CHRISTINA RUST, City Clerk

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project 0348-01421, Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of its real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will make a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of contractor terms and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their position for a purpose that conflicts or presents the appearance of personal or personal gain.
8. Will comply with the intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 16 statutes or regulations specified in Appendix A of OMB's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4401 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 89-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1601-1683 and 1685-1982), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§501-01 (G)(1)), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-253), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1973 (P.L. 9-618), as amended relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§5233 and 5-27 of the Public Health Service Act of 1940 (42 U.S.C. §§2501-3 and 2510-3), as amended, relating to nondiscrimination on the basis of drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which applicable for Federal assistance; (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles I and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-616), which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1321-1328 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §5027(a) to 7-76-7), the Copeland Act (40 U.S.C. §276c and 10 U.S.C. §874) and the Contract Work Hours and Safety Standards Act (40 U.S.C. §8927-330) regarding labor standards for federally-assisted construction subagreements.

14. Will comply with flood insurance purchase requirements of Section 122(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234), which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.

15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) mitigation of wetlands pursuant to EO 11392; (c) evaluation of flood hazards in floodplains in accordance with EO 11988; (d) assurances of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (76 U.S.C. §624(h) et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §87401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-522); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

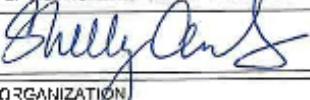
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §1271 et seq.) related to protecting components of potential components of the national wild and scenic rivers system.

17. Will assist the awarding agency in ensuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470i; FO 11595) (identification and protection of historic properties); and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §54489-7 et seq.).

18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1995 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

20. Will comply with the requirements of Section 7(c)(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 710c) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Moorhead		5-30-2024	

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

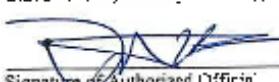
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

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

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

Consistency with plan -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (42 U.S.C. 1701n) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

5-30-2024

Date

City Manager
Title


Michelle (Shelly) Carlson, Mayor

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.705.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current, consolidated plan that has been approved by HUD.

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the jurisdiction certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program years: ~~2022, 2023, + 2024~~ [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

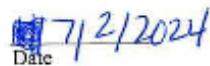
1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility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

Compliance with Anti-discrimination Laws – The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws – It will comply with applicable laws.


Signature of Authorized Official


Date

Mayor
Title

OPTIONAL: Community Development Block Grant Certification

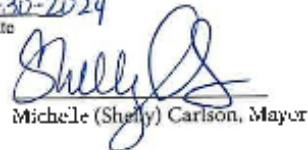
Submit the following certifying only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assigned activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.


Signature of Authorized Official

5-30-2024
Date

City Manager
Title


Michele (Shelly) Carlson, Mayor

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

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