

2010 Action Plan
(May 1, 2010 - April 30, 2011)

Community Development Block Grant
Oshkosh, WI



OSHKOSH
ON THE WATER

Prepared for:

U.S. Department of Housing and Urban Development



2010 Action Plan/Program Year 1 2010-2014 Consolidated Plan Oshkosh, WI

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Date Submitted	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
City of Oshkosh		WI554960 OSHKOSH	
Department of Community Development		DUNS: 048029839	
PO Box 1130, 215 Church Avenue		Organizational Unit: Municipality	
Oshkosh	Wisconsin	Department of Community Development	
54903-1130	Country U.S.A.	Division of Planning Services	
Employer Identification Number (EIN):		Winnebago County	
39-6005563		Program Year Start Date (05/2010)	
Applicant Type:		Specify Other Type if necessary:	
Local Government: City		NA	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles: 2010 Action Plan		Description of Areas Affected by CDBG Project(s): Oshkosh, WI	
\$CDBG Grant Amount: \$929,653	\$Additional HUD Grant(s) Leveraged NA	Describe NA	
\$Additional Federal Funds Leveraged NA		\$Additional State Funds Leveraged NA	
\$Locally Leveraged Funds NA		\$Grantee Funds Leveraged NA	
\$Anticipated Program Income: \$150,000 – Housing Rehab Loan Repayment		Other (Describe): \$75,700 – Public Service Consortium (United Way, OACF, Winn County)	
Total Funds Leveraged for CDBG-based Project(s): \$1,079,653			
Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles: NA		Description of Areas Affected by HOME Project(s)	
\$HOME Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOME-based Project(s)			

Housing Opportunities for People with AIDS		14.241 HOPWA
HOPWA Project Titles: NA		Description of Areas Affected by HOPWA Project(s)
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged
\$Locally Leveraged Funds		\$Grantee Funds Leveraged
\$Anticipated Program Income		Other (Describe)
Total Funds Leveraged for HOPWA-based Project(s)		

Emergency Shelter Grants Program		14.231 ESG
ESG Project Titles: NA		Description of Areas Affected by ESG Project(s)
\$ESG Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged
\$Locally Leveraged Funds		\$Grantee Funds Leveraged
\$Anticipated Program Income		Other (Describe)
Total Funds Leveraged for ESG-based Project(s)		

Congressional Districts of: Congressman Tom Petri		Is application subject to review by state Executive Order 12372 Process?	
Applicant Districts: 6th	Project Districts: 6th		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input type="checkbox"/> Yes	This application was made available to the state EO 12372 process for review on DATE NA
		<input checked="" type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
First Name: David	Middle Initial: L	Last Name: Buck
Title: Principal Planner	Phone: 920-236-5062	Fax: 920-236-5053
email: dbuck@ci.oshkosh.wi.us	Grantee Website: www.ci.oshkosh.wi.us	Other Contact: Darryn Burich, Director
Signature of Authorized Representative		Date Signed

GENERAL

GRANTEE: City of Oshkosh, WI

CONSOLIDATED PLAN PERIOD: 2010 to 2014

PERIOD COVERED BY ACTION PLAN: 5/1/2010 to 4/31/2011

Executive Summary (92.220(b))

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

During the 2010 Program Year, the City of Oshkosh will pursue the implementation of projects and activities in four major categories: 1) Central City Development & Community Facilities; 2) Housing & Neighborhood Development; 3) Public Services; and 4) Administration & Planning. Of the \$929,653 in CDBG funds and estimated \$150,000 in Program Income (equaling an estimated \$1,079,653), a minimum of \$540,397 of entitlement funds and the all of the estimated \$150,000 program income (equaling \$690,397) is allocated for activities that will benefit LMI persons or be used for the elimination of slum and blight conditions.

PROJECTS	Est. 2010 Allocation	Est. LMI Benefit
I. Central City Development & Community Facilities		
A. Targeted Central City Redevelopment	\$190,756	
Subtotal	\$190,756	
II. Housing/Neighborhood Development		
A. Housing Rehabilitation	\$330,397	\$330,397
B. Rental Rehabilitation	\$40,000	\$40,000
C. Neighborhood Initiatives/Development	\$40,000	\$40,000
Subtotal	\$410,397	\$410,397
III. Public Services		
A. General Public Services	\$98,000	\$98,000
B. Fair Housing Center of Northeast Wisconsin	\$10,000	\$0
C. Oshkosh Housing Authority	\$17,000	\$17,000
D. Oshkosh Srs. Center Health Program	\$8,555	\$8,555
E. Oshkosh Srs. Center Fitness Program	\$6,445	\$6,445
Subtotal	\$140,000	\$130,000
IV. Administration and Planning		
A. Administration and Salaries	\$178,500	
B. Public Services Consortium Admin.	\$10,000	
Subtotal	\$188,500	
Total	\$929,653	\$540,397

Using the formula below to determine minimum LMI benefit, we determine that the estimated expenditures exceed the 70% minimum LMI Benefit:

- Funds for LMI benefit including Est. Program Income / (Allocation + Est. Program Income) – Administrative = Est. Percent LMI Benefit
- $\$540,397 + \$150,000 / (\$929,653 + \$150,000) - \$188,500 = \text{Est. Percent LMI Benefit}$
- $\$690,397 / \$891,153 = 77.4 \%$

Activities funded with CDBG funds in this Action Plan will meet the national objectives of benefiting LMI persons and/or preventing or eliminating slum or blighting conditions.

General Questions

- 1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.**

GEOGRAPHIC AREAS

Assistance will be directed primarily to LMI census tracts and block groups as shown in the map on page 4. The majority of the LMI census tracts and block groups are located within the oldest areas of the Central City, which are predominately single and two-family residential neighborhoods (though many have experienced inappropriate single family to multiple family conversions), but also include a mix of commercial, industrial and institutional uses.

Within these geographic areas, priority will be given to assistance in the areas indicative of the following:

- Areas with high concentrations of rental housing and inappropriately converted single family to multiple family housing.
- Priority areas, as identified in the City's 2005-2025 Comprehensive and Neighborhood Redevelopment Plans.
- Areas showing evidence of an increase in physical blight, abandonment or foreclosures.
- Historic Districts, especially those that are threatened.

AREAS OF MINORITY CONCENTRATION

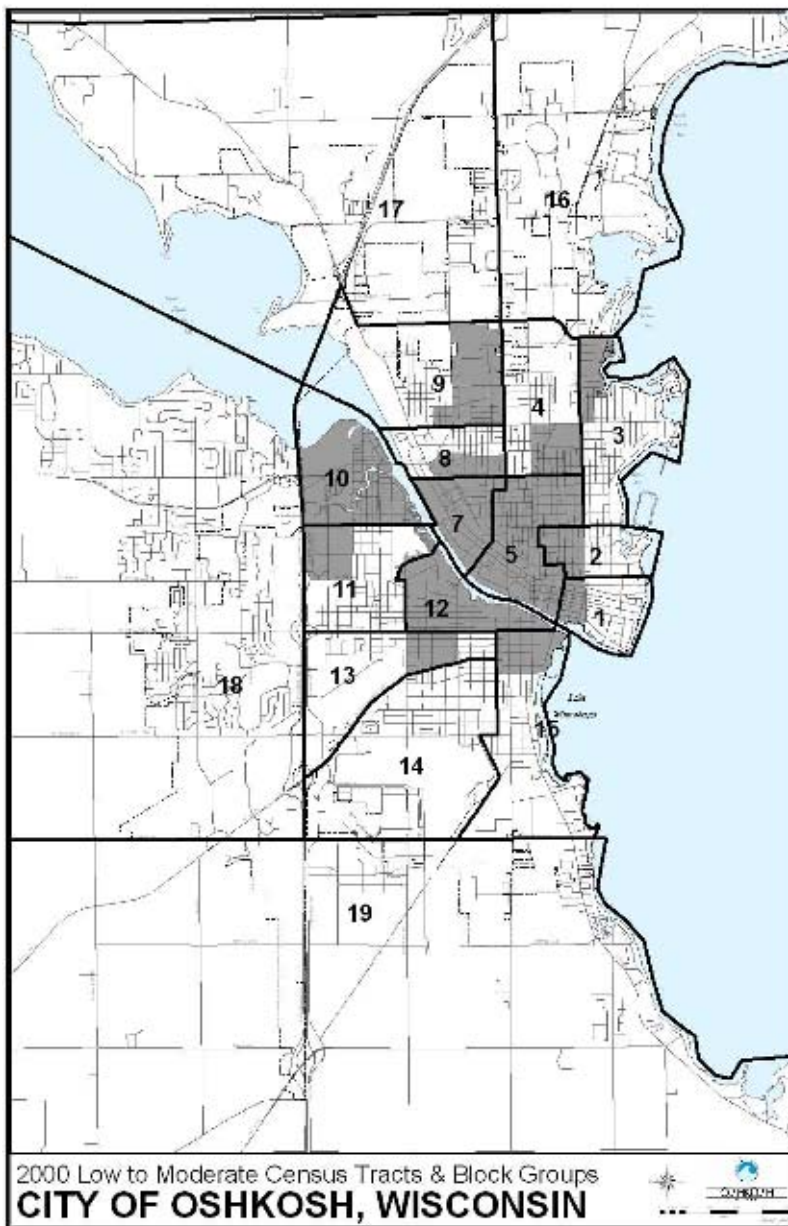
Census block groups with over 150 persons answering with a "Non-White" race in the 2000 Census are shown in the table on the following page. After excluding census block groups with institutionalized populations such as the State of Wisconsin Correctional Facility, the University of Wisconsin-Oshkosh student housing, the Winnebago County Mental Health Institution, and the Park View Health Center, the block groups with the greatest racial/minority concentrations are as follows:

AREAS WITH HIGHEST NUMBER OF RACIAL/MINORITY CONCENTRATIONS

Geographic Area	Number of Non-White Alone	Percent of Non-White Alone
Census Tract 5, Block Group 3	335	14.76
Census Tract 5, Block Group 2	192	23.53
Census Tract 2, Block Group 3	179	20.62

Source: 2000 U.S. Census

These three block groups are located in the Central City area and are all located in LMI census tracts.



2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.

The City adopted the 2005-2025 Comprehensive Plan in March, 2005. Nine elements are outlined in Wisconsin comprehensive planning legislation, including a housing element, which requires the following:

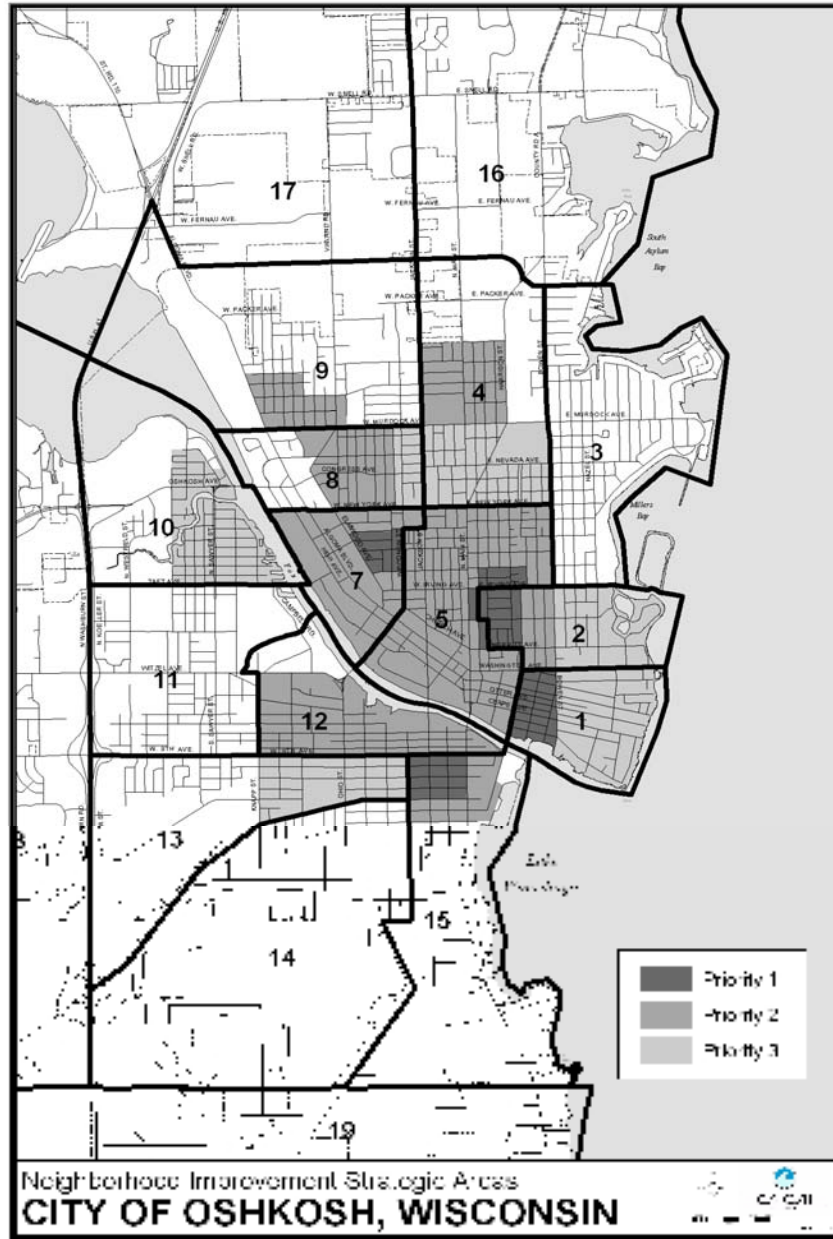
- A compilation of objectives, policies, goals, maps and programs of the City to provide an adequate housing supply that meets existing and forecasted housing demand.
- The element shall assess the age, structural, value and occupancy characteristics of the city's housing stock.
- The element shall also identify specific policies and programs that promote the development of housing for residents of the city and provide a range of housing choices that meet the needs of persons of all income levels and of all age groups and persons with special needs, policies and programs that promote the availability of land for the development or redevelopment of low-income and moderate-income housing, and policies and programs to maintain or rehabilitate the city's existing housing stock.

"Neighborhood Improvement Strategic Areas" with three levels of priority were identified within the Comprehensive Plan document based on neighborhood characteristics. To establish the "priority areas," data from the 2000 U.S. Census (tract and block group level) were analyzed, including the value and age of the housing stock, the tenure of residents (owner versus renter), and the LMI areas. This data serves as the basis for assigning the priority given to each area. While three different priority levels are identified, funds will continue to be concentrated in the four Priority 1 Areas, and particularly in the two, identified as the Near East Neighborhood priority area and the Broad/Bay Neighborhood priority area (both described in further detail below).

Characteristics of the Priority 1 Areas are as follows:

Priority 1 Areas are the four darkest shade areas shown on the following map. These areas tend to have poor streets, or streets without curb and gutter, and have the greatest need for neighborhood revitalization and housing rehabilitation. All Priority 1 Areas are in LMI census tracts or block groups. Other characteristics include:

- Owner-occupied rates lower than the city as a whole.
- Percentage of homes built pre-1940 is higher than the overall percentage.
- The median year structures were built in these areas range from pre-1940 to 1955, compared to the city's median year of 1959.
- The median value for owner-occupied units ranges from 4 to 28 percent lower than the city's overall median value of \$85,500.



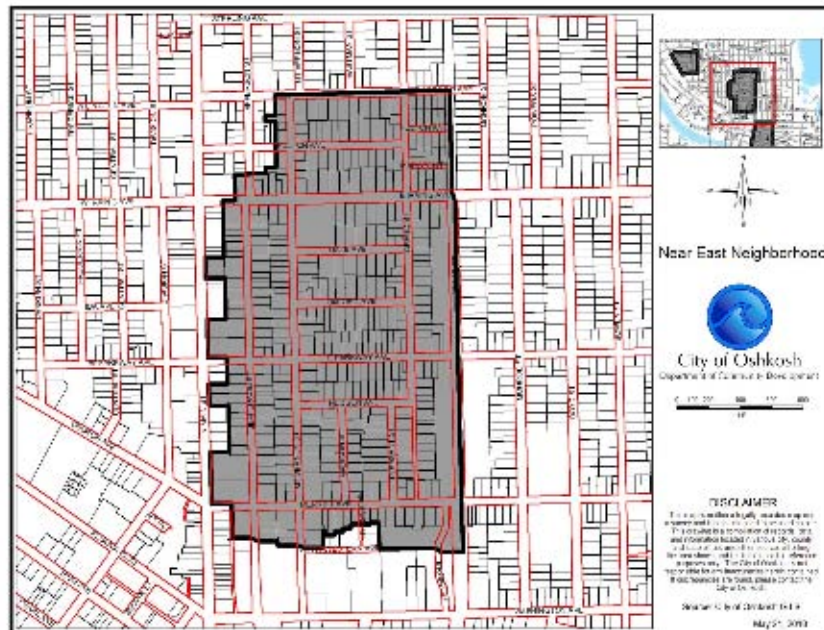
The City will use CDBG funds in these priority areas for housing related activities such as single family and multiple family rehabilitation, homeownership assistance programs, and preservation of historic residential structures and may also use funds for non-housing community development needs such as the establishment of neighborhood associations, streetscaping, neighborhood facilities, parks/recreational facilities, and public facilities and improvements. The City may also use funds for the purchase, demolition, and disposition of deteriorating or blighting structures/properties. In addition, the City aims to coordinate the expenditure of CDBG funds with the implementation of the City’s Capital Improvement Program (CIP). Activities funded through the CIP plan include the upgrade of streets, sidewalks, and sewer/water/storm sewer service lines.

In addition to bricks & mortar activities such as housing, street, and sidewalk rehabilitation, other activities may include:

- Analysis of zoning to determine compatibility with overall neighborhood goals and recommendations such as down zoning or redevelopment options.
- Enforcement of existing codes including systematic inspection/evaluation of properties on a block by block basis for determination of blighting influence.
- Survey of properties as potential State Historical Society or local Landmark Commission nomination.
- Creation of Neighborhood Watch groups and Neighborhood Associations.
- Provision of landlord and/or tenant training programs.
- Analysis of neighborhood quality of life conditions such as parking restrictions, transit availability, proximity to parks, etc.

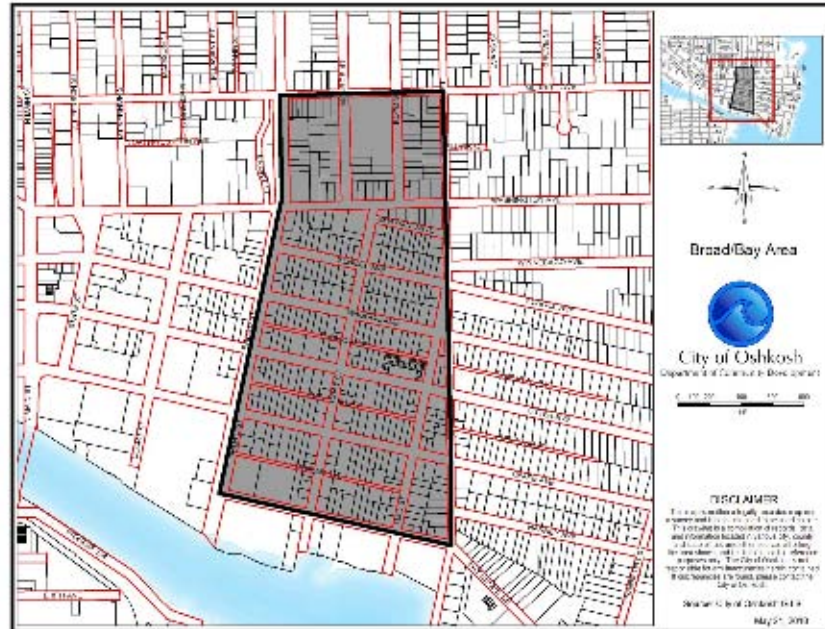
Associated with these priority areas are redevelopment areas designated by the City. Eligible activities in these Central City redevelopment areas include acquisition and disposition of property, relocation and demolition of blighting structures. The end result being new housing, uses that create job opportunities for LMI people or a combination of housing and commercial uses that would meet both of these objectives.

The **Near East Neighborhood (NEN)** was selected as the first neighborhood where concentrated efforts took place in the 2005-2009 Consolidated Plan timeframe and continue to take place throughout this 2010-2014 Consolidated Plan period. This neighborhood is bordered on the west by Jefferson Street, on the north by Lincoln Avenue, on the south by Merritt Avenue and on the east by the Canadian National Railroad. Activities undertaken in the NEN have and will meet the national objectives of benefiting LMI persons and preventing/eliminating slums or blight. The NEN is entirely within either a LMI Census Tract or Block Group; therefore, the percentage of LMI persons is at least 51% of the residents within the neighborhood. This neighborhood consists of all of Census Tract 2, Block Group 3, and a portion of Block Group 2 and 3 of Census Tract 5. Activities for residents of this area may be conducted with a LMI Area Benefit because these activities are available to benefit all residents of the service area. Services for specific residents of the service area (seniors, tenants, children, etc.) may also qualify under the Limited Clientele subcategories of the LMI Area Benefit national objective.



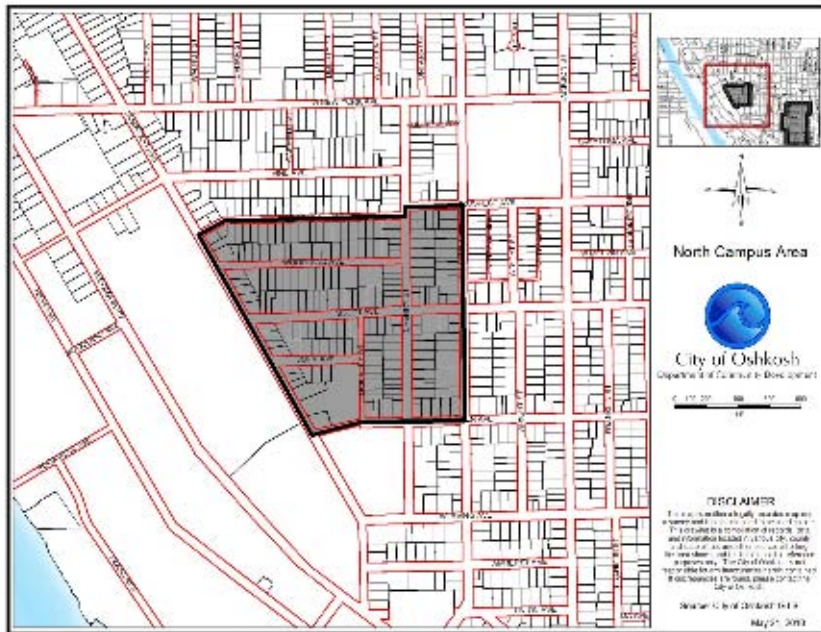
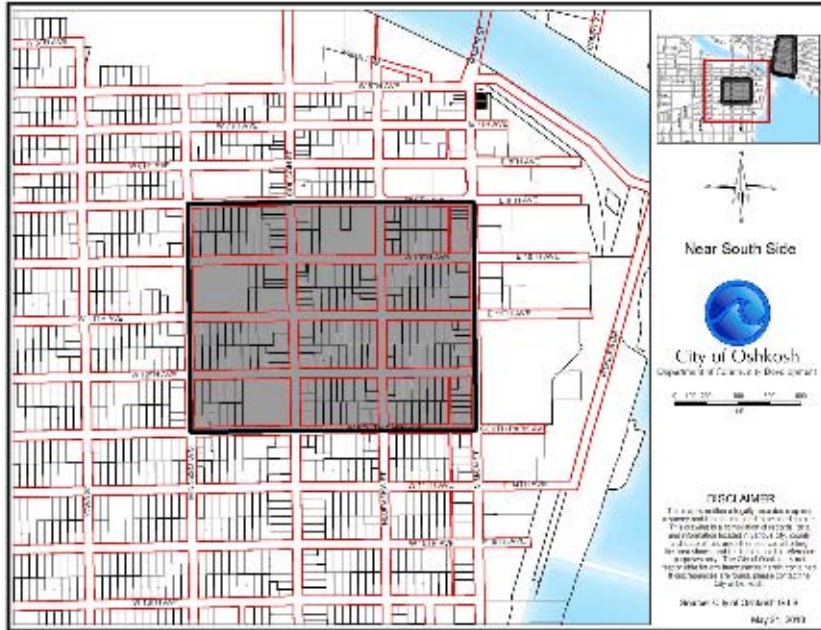
The **Broad/Bay Area Neighborhood** is anticipated to be initiated as the second focused Neighborhood Improvement Strategic Area. This area is bordered on the west by Broad Street, on the north by Merritt Avenue, on the south by Bay Shore Drive and on the east by the Bowen Street. The City of Oshkosh Department of Community Development sees this as an appropriate selection due to the age and condition of the housing stock, the low rate of owner occupancy (41% per the 2000 Census), and the fact the area is a LMI block group.

The City will supply CDBG rehabilitation funding, Neighborhood Initiative funds, technical assistance, and will consider adoption of supportive zoning regulations for the creation of a true private-public partnership. The Broad/Bay Area is Block Group 3 of Census Tract 1, and is a LMI block group. The neighborhood is primarily residential in use and the boundaries in the map delineate the area that will be served by these



concentrated neighborhood activities. Therefore, activities for residents of this area may be conducted with a LMI Area Benefit because these activities are available to benefit all residents of this defined service area. Services for specific residents of the service area (seniors, tenants, children, etc.) may qualify under the Limited Clientele subcategories of the LMI Area Benefit national objective.

The **North Campus Neighborhood and the Near Southside Neighborhoods** are also Priority 1 Neighborhood Improvement Strategic Areas. These areas are not expected to become “active” during the first year of the 2010-2014 Consolidated Plan Period; however, special consideration on spending, especially with slum and blight removal and rehabilitation projects, will be given in these areas.



3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

The City will continue to initiate progress towards implementation of the added strategic neighborhood area as well as adding the two additional Neighborhood Improvement Strategic Areas. City departments will continue participate in internal discussions (Police, Inspections, Health, Planning, Assessor, etc.) and coordinate with citizens in the selected areas. By coordinating actions of City staff, the obstacle for staff capacity will be addressed so that actions can be as concentrated as possible. Also by involving the residents of these neighborhoods, the residents will be a resource of information and for implementation of the strategies.

Coordination between the public and private sectors will form a partnership to address priorities of these neighborhoods. The intended outcome of tailoring needs to the neighborhoods will be that the residents will be much more informed and intricately involved in the governance and neighborhood redevelopment activity processes in order to direct and aid in the implementation of neighborhood projects. A partnership is planned to be initially instituted with the creation of a non-profit (501c3) neighborhood coordination organization that would eventually be chartered and associated with the national NeighborWorks organization. This partnership is intended to be used as a nongovernment tool to assist in the establishment of neighborhood associations for neighborhoods including, but not limited to, the Near East, the Broad/Bay, North Campus and the Near Southside priority areas. The goals of this partnership will be housing rehabilitation projects, general review of the housing and neighborhood improvement programs and broader neighborhood improvement activities, as determined by the private organization and resident input.

4. Identify the federal, state, and local resources the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan. (92.220(c)(1))

The Oshkosh/Winnebago County Housing Authority is an independent quasi-governmental agency operating in Oshkosh. It is anticipating receiving a range of federal funds in support of affordable housing.

Last year the Authority received American Recovery and Reinvestment Act (ARRA) grants totaling \$761,535 to supplement annual grants of \$600,000. The agencies' combined Operating Fund grants to support the operation costs of Public Housing is \$462,780. We would expect approximately \$250,000 of the funds above will be spent within Oshkosh.

Also, last year was the distribution of the Neighborhood Stabilization Program (NSP) grant where the Winnebago/Oshkosh Housing Authority, in conjunction with the City and other municipalities, received \$1,146,000. It is anticipated again that 40-60 percent of the funds will be spent on projects in Oshkosh. Additionally, it is anticipated that approximately \$300,000 in funds will be "recycled" from home sales and put into new projects.

Low-income housing tax credits are being sought for nearly \$23,000,000 for partial replacement of the Court Tower Public Housing facility, but awards will not be known until June or July.

Also supporting affordable housing in Oshkosh would be the Section 8 Project-Based subsidies supporting tenancies at Marian Manor and Cumberland Court Apartments totaling \$789,397.

The Housing Choice Vouchers program will be supported by a grant of \$1,761,872, but again spending for that program will support affordable housing beyond the municipal borders. Projections would be somewhere between 50 and 60 percent spent in Oshkosh.

Another \$138,750 in HOME and HODAP funds for the homebuyer assistance program from the State of Wisconsin was received by the Oshkosh/Winnebago County Housing Authority with application pending for an additional \$400,000 to be allocated later this year.

Any McKinney-Vento moneys in the form of Supportive Services Programs and Emergency Shelter Grants are likely to be allocated to members of the Winnebagoland Housing Coalition

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

The City of Oshkosh Department of Community Development is the lead agency responsible for administering the programs covered by the 2010-2014 Consolidated Plan and the 2010 Action Plan. The Department will also sub-contract with public service providers individually and through the Public Service Consortium. Staff from these individual agencies will be responsible for administering their own programs and reporting required information back to the Department. For example, the City will contract with the Oshkosh /Winnebago County Housing Authority to provide services related to the Homebuyer Assistance Program. The sub grantee is contracted/required to provide quarterly reports to show progress during the administration of their program, which is then reported to the City.

In order to keep Oshkosh residents familiar with the CDBG program, City staff will present the annual Consolidated Annual Performance and Evaluation Report (CAPER) to the Plan Commission, which will then be broadcast on the local cable access television station. It is done to show success stories for the program year that had been completed and to familiarize the Plan Commission and the television audience with the CDBG program. Additionally, mass mailings and discussions on the Oshkosh Community Access Television will be conducted to showcase the rehabilitation programs.

In the development of this Plan, applications are solicited (due in October) for non-public service projects. A public informational meeting is held on or around November 1 at the Oshkosh Seniors Center to present the estimated 2010 CDBG Action Plan and the 2010-2014 Capital Improvements Program as well as to answer questions and solicit comment. The Action Plan (in conjunction with the Consolidated Plan for this year) is then presented to the Plan Commission during their regularly scheduled meeting and a recommendation is forwarded to the Common Council, who in turn approves, denies or modifies the recommended allocations.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

Cooperation between the public, quasi-public and private housing, health and social service agencies is at a high level based on a long history of cooperation and coordination and use of agencies such as the Public Service Consortium, the Winnebagoland Housing Coalition, Lead Prevention Coalition, Fox Valley Health Consortium and the regional division of the WI Association of Local Health Departments and Boards.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

At this time, no additional actions have been identified beyond what the City is currently doing to coordinate with other agencies.

Citizen Participation

1. Provide a summary of the citizen participation process.

The citizen participation process for the 2010 Action Plan was held in conjunction with the 2010-2014 Consolidated Plan Citizen participation process as well as the preparation of the Capital Improvement Plan (CIP). As part of the preparation of the Annual Action Plan budget and the CIP, a neighborhood public meeting to outline these budgets was held at the Oshkosh Seniors Center on November 5, 2009. The four broad categories for projects (Central City & Public Facilities, Housing & Neighborhood Development, Public Services, and Administration & Planning) and estimated funding levels were presented to the general public in a neighborhood style information meeting. The results and comments as well as the estimated funding levels were then forwarded to the City Plan Commission and the Common Council in November 2009.

Specific actions for participation in the 2010 Action Plan and the 2010-2014 Consolidated Plan included a June 1, 2010, legal public notice published in the Oshkosh Northwestern initiating a 30-day public review period of this Plan and notifying the public of a hearing on the Plan on July 1. Those interested were invited to view the plan at the Department of Community Development office, the public library and the City's website.

On July 6, 2010, the Oshkosh Plan Commission reviewed the 2010-2014 Consolidated Plan along with the 2010 Action Plan to ensure consistency with the City's 2005-2025 Comprehensive Plan, official maps, or other planned activities of the City.

On July 13, 2010, the Oshkosh Common Council held a public hearing on the 2010-2014 Consolidated Plan along with the 2010 Action Plan to receive any comments or views on the Plans.

2. Provide a summary of citizen comments or views on the plan.

Comments from the July 1, 2010 public hearing centered on the process of distributing public service funding as it relates to the application process, application ranking and determination of what groups are funded and what that funding level would be. There was a general comment regarding the need for public service assistance, especially for the disabled and the need of the community to increase efforts for this group. It was felt that the information contained in the plan, especially income disparity and housing issues, was important to have as a focus for fund allocation.

The Oshkosh Plan Commission reviewed the document, as well as the 2010 Action Plan at the July 6, 2010 Plan Commission meeting. The Commission made the statement that they have reviewed the plan for conformance with the City's 2005-2025 Comprehensive Plan, official maps, or other planned activities of the City. The Commission inquired whether housing improvement program funding has been at a consistent level in the past and within the five-year plan was posed as well as if landscaping of homes and sites could be included. Staff addressed the inquiry by noting that overall grant amounts have changed over the years with trends being a reduction; but that the housing rehabilitation program is a major component and always receives substantial funds to be an effective program. More research on whether landscaping would qualify under CDBG regulation is needed but it could potentially be included as part of a neighborhood initiative project, which is included as part of the plan. The Commission requested an explanation of the rental rehabilitation program. Staff stated that it is

to rehabilitate rental units in an effort to provide decent affordable rental housing that assists in improving the overall neighborhood and contains stipulations that units remain affordable. The Commission also made a comment that a more holistic approach to the rental rehabilitation program needed to take place including scattered site versus “downtown only” rehabilitation in high density areas. It was suggested that the City work more closely with the University of Wisconsin on housing issues near campus. The Commission asked if there were programs used to address job skills, medical care and other needs of low and moderate income (LMI) people. Staff replied that these items are addressed by the public service category, which is partially administered by contract with the Public Service Consortium that was created approximately five years ago with the City, Winnebago County, the United Way and the Oshkosh Area Community Foundation. Questions to the openness and appropriateness of the Public Service Consortium was brought up and discussion on whether the City Council should be approving the exact and final funding for public service agencies rather than a group of representatives from the four consortium agencies. A representative of the Fair Housing Council was in attendance and expressed her support of the plan.

On July 13, 2010, the Oshkosh Common Council held a public hearing on the 2010-2014 Consolidated Plan along with the 2010 Action Plan. Some Council comments focused on the allocation of public service funds and the use of the Public Service Consortium as a review body. Thoughts were expressed that the Council should be the application review body with the ability of appeal by the applicant. Other Council members addressed this item by commenting that a Council representative (the Mayor last year) sits on the Consortium Review Committee and other elected officials would be welcome on the review committee. Furthermore, some Council members stated they supported the Consortium form of application review as it had experienced qualified public service agency adept reviewers and they expressed concerns that making the Council the application reviewer may turn the process too “political” and become more political than functional, as well as to confuse issues of grant requirements versus desires to fund specific agendas.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

Copies of the 2010 CDBG Action Plan were made available in a variety of venues in an effort to broaden public participation. A legal ad was published in the Oshkosh Northwestern, notifying readers of the neighborhood meeting and public hearings before the Plan Commission and the Common Council. The notice also included a website link so that the Plan could be accessed on-line through the City's website if the public wanted to view the plan or make a copy. Also within the notice was an invitation to persons with specialized needs (language, handicap accessibility, etc.) to call the City to make any necessary arrangements. All meetings held in conjunction with the preparation of this Plan were held in handicap accessible buildings and meeting rooms. Outreach also included personal contact with the local Hmong Service Center (largest minority group in Oshkosh), UMOs (United Migrant Opportunity Service), ADVOCAP (representing many persons with special needs), and with the Oshkosh Seniors Center.

A public hearing was held on July 1, 2010. Those interested were invited to view the plan at the Department of Community Development office, the public library and the City's website prior to the hearing.

A public meeting was held on July 6, 2010 with the Oshkosh Plan Commission. The Plan Commission reviewed the Action Plan for consistency with the City's 2005-2025 Comprehensive

Plan, official maps, or other planned activities of the City. The meeting was televised on the local cable access channel so that television viewers could also see the proposal.

A public meeting was held on July 13, 2010 with the Oshkosh Common Council. The Council and public were given an opportunity to provide input regarding the proposed projects in the plan. This meeting was also broadcast on the local cable access channel. Copies of the staff reports, plan and minutes are included on the City's website.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

All comments were accepted and included within the document.

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

Actions taken will be continuations of commitments the City staff has made to overcome gaps among institutional structures. The City will continue to work with the Oshkosh Area United Way and the Oshkosh Area Community Foundation on coordination and supervision of the CDBG and other funds for public service activities and programs through the "Public Service Consortium." This joint coordination effort is designed to avoid unnecessary duplication of efforts in providing financial awards to service providers.

In providing funding directly for the Housing Authority's Homeownership Assistance Program and the Fair Housing Center of Northeast Wisconsin, the City will stipulate that CDBG funded activities will be undertaken in a manner which increases coordination and cooperation between funded agencies and others working with the same populations and providing similar or complimentary services and programs.

Also, the Winnebagoland Housing Coalition is an organization oriented to coordination between public and private social service agencies in Oshkosh. While the City is not in a position to direct or control the activities of this group, City staff does participate. In addition, the City will forward information through the electronic "Information & Referral Service" listserv.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

The City of Oshkosh Department of Community Development will coordinate the implementation of this Action Plan and report progress towards the goals from the Consolidated Plan in the Department of Housing and Urban Development (HUD) Integrated Disbursement and Information System (IDIS) and annual CAPER. Monitoring of projects is done on a case-by-case basis as funds are requested. Subrecipient monitoring is done through submittal of program information, required by the Agreements between the City and subrecipient, as well as monitoring spending through staff contact, invoice submittal and review and site visits.

The monitoring actions are conducted to ensure the timeliness of spending. Quarterly and annual reports are required for all funded activities. When these reports are submitted they are reviewed in accordance with the Agreement. If quarterly reports are not made on time or the subrecipient is not meeting the requirements of the Agreement, the Department staff will meet with the subrecipients for a coordination meeting and monitor progress to meet the requirements of the Agreement.

Housing rehabilitation activities are monitored during the rehabilitation period when construction is underway. Payments are not made until the contractor has satisfactorily completed the work including obtaining the appropriate zoning, building, plumbing, electrical, or HVAC permits needed. The Department of Community Development's Housing Rehabilitation Specialist checks to make sure permits have been obtained and the contractor has requested code compliance inspections. A compliance inspection of the work is also made by the Housing Rehabilitation Specialist and/or appropriate staff of the City's Inspection Services Division to determine compliance with local zoning and the Uniform Dwelling Code. When it is determined that the work is satisfactorily completed, after securing the owners signature on a payment request form, payment to the contractor is released. No final payment is made on a project until the contractor has satisfactorily completed the work in accordance with the contract and the work complies with housing codes as determined by the appropriate inspectors. Many projects have several inspections to determine compliance, depending on the scope of work of the contract.

Lead-Based Paint

- 1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.**

All properties where CDBG funds are used will be assessed for lead paint hazards and a Lead Risk Assessor will address such issues. The City of Oshkosh has Lead Risk Assessors on staff. If additional funding for lead abatement becomes available, the City will apply for these funds. Additionally, all contractors used to perform lead hazard reduction work must be trained and certified by the State in a lead hazard reduction discipline and associated with a certified lead company. The City prefers to work with State Certified general contractors as part of their housing improvement programs, as most projects disturb lead based paint or control/abate lead paint hazards. However, the general contractor may subcontract the lead work to a certified lead subcontractor.

HOUSING

PLEASE ALSO SEE HOUSING NEEDS TABLE IN APPENDIX

Specific Housing Objectives

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.**

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The City's housing objectives for the 2010 Program year can be summarized into four categories including Rental Rehabilitation, Owner-Occupied Rehabilitation, Homebuyer Assistance, Neighborhood Improvement Strategic Areas and Fair Housing. These activities are described in detail below as is the resources to be allocated for each.

Rental Rehabilitation

The City has allocated \$40,000 in CDBG funds to combine with previous unspent funds to continue with the creation/conversion/rehabilitation LMI rental projects in the 2010 Program Year. These projects are sought through direct application and coordinated application by the Winnebago Apartment Association. The City anticipates five rehabilitations will be completed in the 2010 Program Year.

Owner-Occupied Housing Rehabilitation

The City has allocated an estimated \$330,397 in 2010 CDBG funds for this purpose. After housing administration-related salaries are deducted from this total, the City anticipates 15 rehabilitations will be completed. Some of this rehabilitation funding will be in conjunction with the participants in the Oshkosh/Winnebago County Housing Authority's program for first time homebuyers. The City will access lead abatement grant funding as available and needed in conjunction with rehabilitation projects. Funds will be committed to additional projects during the program year; however, these may not be completed in the same program year due to availability of contractors and weather related problems. Projects may include those providing handicap modifications.

Also, program income received during the 2010 Program Year will be used for eligible affordable housing projects. This program income is for the most part received from mortgage satisfactions and is estimated to be approximately \$150,000 in the next program year.

Homebuyer Assistance

Oshkosh Housing Authority: \$17,000 of the 2010 allocation will be provided to the Authority during the program year for administrative costs relative to a Homebuyer Assistance Program. The City anticipates providing additional support to purchasers through the CDBG funded owner-occupied rehabilitation program and for purchase assistance. It is anticipated that 8-10 LMI households will participate during the program year.

Neighborhood Improvement Strategic Areas

The City will continue the implementation of its "Neighborhood Improvement Strategic Areas" program in the Near East Neighborhood as well as the Broad/Bay Neighborhood, as discussed earlier in this Plan. The goal of the program is to improve the city's older neighborhoods and, in particular, LMI neighborhoods.

Fair Housing

The City will provide \$10,000 in CDBG funds to the Fair Housing Center of Northeast Wisconsin, a program of Metropolitan Milwaukee Fair Housing Council. They will use these funds to cover the cost of providing fair housing information and training to employees of social service and similar agencies working directly with populations at greatest risk of housing.

Needs of Public Housing

1. **Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.**

Since the Homebuyer Assistance Program is a program of the Oshkosh/Winnebago County Housing Authority, the Authority is able to coordinate participation in the program by encouraging their residents to participate. This coordination fills a gap in the participation and outreach process to public housing residents.

2. **If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.**

The public housing agency is not designated as "troubled" by HUD.

Barriers to Affordable Housing

1. **Describe the actions that will take place during the next year to remove barriers to affordable housing.**

Impediments found in the "Analysis of Impediments to Fair Housing Choice" regarding housing choice include lack of understanding of what constitutes a viable fair housing complaint; need for fair housing training for both tenants and landlords; and teaching the effects of financial decisions regarding credit history, home equity, and other loan information.

The following activities will be undertaken in all or in part with the 2010 Program Year to remove barriers to affordable housing:

- A. City administration of rental housing rehabilitation projects and owner-occupied housing rehabilitation projects.
- B. Homeownership assistance by the Oshkosh/Winnebago County Housing Authority through the provision of funds for administration, lead paint compliance, and purchase assistance.
- C. City implementation of neighborhood improvement initiatives as outlined in the 2005-2025 Comprehensive Plan, which are designed to improve the overall condition of older neighborhoods in LMI Census tracts and include some educational opportunities for residents of the area.
- D. Funds granted to Fair Housing Center of Northeast Wisconsin for tenant counseling.

HOME/American Dream Down Payment Initiative (ADDI)

This section is not applicable to the City of Oshkosh.

HOMELESS

PLEASE ALSO REFER TO THE CONTINUUM OF CARE HOMELESS POPULATION AND SUBPOPULATIONS CHART IN APPENDIX

Specific Homeless Prevention Elements

1. **Sources of Funds**—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. **Homelessness**—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. **Chronic homelessness**—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2012. Again, please identify barriers to achieving this.
4. **Homelessness Prevention**—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. **Discharge Coordination Policy**—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

The City of Oshkosh does not receive any private or public funds to address homeless needs or to prevent homelessness. Since there are already a number of public and private organizations providing these homeless services in the community, the City does not provide direct homeless assistance or identify specific planned actions at ending chronic homelessness. Thus, an action plan for ending chronic homelessness by 2012 or barriers are not identified by the City.

However, the Continuum of Care (CoC) in Oshkosh has a direct influence in addressing the needs of the homeless. As presented in the 2010-2014 Consolidated Plan, the following priorities were established by the CoC:

1. Service gap in short term assistance
2. Case management with supportive services
3. Accessible emergency shelter along with motel vouchers
4. Medical and health related services
5. Transportation help
6. Transitional housing
7. Housing and supportive services for chronic homeless
8. Essential personal needs such as food, clothing and personal care items

9. Subsidized permanent housing
10. Foreclosure help
11. Daycare support
12. Fair housing assistance

While City staff will not lead the effort to create a discharge policy, staff will participate in any efforts to create such a policy.

Emergency Shelter Grants (ESG)

The City of Oshkosh does not receive or utilize any emergency shelter grants within its jurisdiction. However, ADVOCAP, as the lead agency in a consolidated application involving Christine Ann Domestic Abuse Services, the American Red Cross and Legal Action of Wisconsin, will be receiving approximately \$134,000 in state funds for the Oshkosh area through HUD ESG/State Transitional Housing Grants.

COMMUNITY DEVELOPMENT

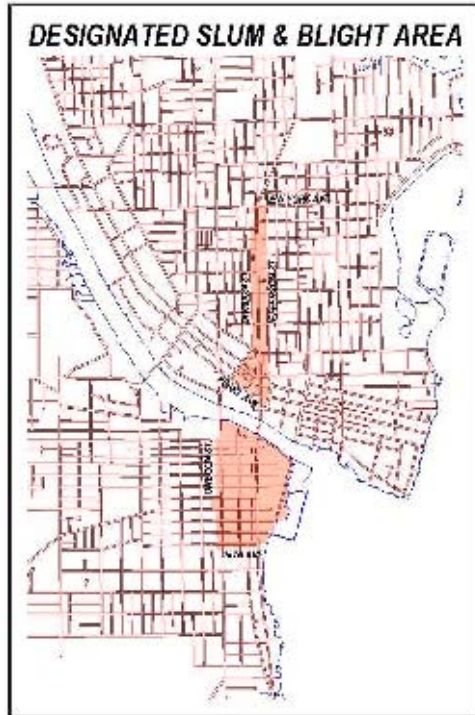
PLEASE ALSO REFER TO THE HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES TABLE IN APPENDIX

Community Development

- 1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.**

In addition to activities presented in association with the "Neighborhood Improvement Strategic Areas," other priorities for non-housing community development needs are located in Oshkosh's designated slum and blight areas and the Central City area, as shown on the two following maps. Also, eligible activities in this category will be conducted in designated redevelopment districts, such as the South Shore Redevelopment Area.

For these areas (slum and blight, Central City, and designated redevelopment areas), eligible activities may include acquisition, relocation, demolition, disposition, clearance, environmental remediation, public facilities improvements, and streetscape.



2. **Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.**

Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

Long-term and Short-term Objectives

Comparing the “Designated Slum and Blight Area” and the “Central City Planning Area” map with the “2000 Low to Moderate Census Tracts & Block Groups”, it is apparent that these areas overlap. By addressing the priorities of the LMI persons in these census tracts and block groups, the priorities of community development needs are also addressed in the long and short-term. The goals and implementation strategies for these areas are either the same – clearance of slum and blight or improvement of the areas for LMI persons or complement each other.

For the 2010 Action Plan, the primary objectives for these areas include the following:

- Purchase/Dispose of three parcels. Possibly assembling smaller, blighted, or underperforming parcels into larger parcels. These larger parcels will be made available for redevelopment.
- Right-of-way and other public facility improvements.

End use in the Central City area will more often than not be a mix of housing and commercial uses. Depending on the area and need, the end use will create a mix of housing opportunities for mixed income households and/or job opportunities for persons of limited means.

Depending on the specific project, the accomplishments will either be annually reported under the activities of “Targeted Central City Development” or “Housing & Neighborhood Development” in the CAPER.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

The City of Oshkosh provides indirect services to reduce the number of households with income below the poverty line. In considering factors affecting poverty that may be impacted by the existing housing programs of the City, the preservation of affordable housing with supportive programs, and services targeted to special needs populations (domestic violence victims, physically and mentally handicapped, elderly, etc.) benefit these populations.

By completing rehabilitation projects on owner-occupied and rental household units below the poverty line, the City will be reducing the housing cost burden to some extent for these households. The reduction in housing cost burden would result from actions that would reduce energy and repair costs to keep the home in habitable condition. The City recognizes that while this in itself will not increase the level of income of these households, it will make more household funds available to cover other expenses. Also, the rehabilitation loans have no repayment requirements until the owner sells the home; therefore, no additional cost burden is added to the household as a result of these zero-payment, zero-interest loans.

In addition, the City may require the loan recipient to attend a budget counseling session as a condition of the housing rehabilitation loan approval process. This requirement is based on the City’s position that the rehabilitation loan is a partnership effort – the loan will allow the owner to make the house more livable and the owner will receive additional financial information that may reduce the possibility of the house falling into disrepair in the future.

The City recognizes that while budget counseling in itself will not increase the levels of income of these households, households may gain skills allowing them to be able to use their income more strategically in paying off debts, thereby lessening the financial burden on the household.

Approximately 15-20 household rehabilitation projects will be funded in 2010.

NON-HOMELESS SPECIAL NEEDS HOUSING

PLEASE ALSO REFER TO THE NON-HOMELESS SPECIAL NEEDS TABLE IN APPENDIX

Non-Homeless Special Needs

- 1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.**
- 2. Describe how Federal, State, and local public and private sector resources that are**

reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

The Non-Homeless Special Needs table shows housing and supportive services needed for various groups of persons. Priorities the City aims to meet include providing supportive services such as emergency housing assistance, elderly nutrition programs, and advocacy programs for disabled populations through the public services- funded Public Services Consortium.

In prior program years, the City has funded, through the Consortium, organizations such as the local American Red Cross Chapter, ADVOCAP-Elderly Nutrition Program, UW-Oshkosh Living Healthy Community Clinic and the Christine Ann Domestic Abuse Services Center, to meet its goals of providing services to these groups with special needs. The City will continue in 2010 to use the Consortium to allocate funds to public service agencies who address the needs for this population. Four agencies pool funds as part of the Consortium, including the City, Winnebago County, the Oshkosh Area United Way, and the Oshkosh Area Community Foundation. In 2010, pooled funds totaling approximately \$175,000, of this \$98,000 from CDBG funds, will be used to assist nine different public service programs. Final allocations for the Public Service Consortium of 2010 CDBG funds are as follows:

Agency	Program	Allocation
ADVOCAP	Winnebago County Nutrition Program	\$8,000
American Red Cross	Bridges Emergency Assistance Program	\$16,000
Christine Ann Domestic Abuse Services	Emergency Shelter & Advocacy Services	\$16,000
UW-Oshkosh Living Healthy Community Clinic	Living Healthy Community Clinic	\$20,000
Winnebago Conflict Resolution Center, Inc	Mediation Services for LMI Oshkosh Residents	\$6,100
ADVOCAP "Project POWER"	Provide opportunities for women victims of abuse to be self-sufficient (employment & retention)	\$7,000
Reach Counseling Services	Sexual Abuse Treatment Program	\$6,400
Tri-County Community Dental Clinic	Focus on Children's Dental Care	\$10,000
Clarity Care, Inc.	Help at Home Program	\$8,500

Funds for housing needs for non-homeless persons will not be directed specifically at some of these groups with special needs but these groups may benefit indirectly from the use of CDBG funds that meet housing needs and provide supportive services. For example, the City is not proposing any direct funding to persons with Alcohol and Other Drug Abuse (AODA) or HIV/AIDS, as requests have not been made for direct benefits to these groups; however, these groups may benefit from the City-funded public service agency and housing service activities through the Consortium and the Oshkosh Housing Authority, respectively.

Housing needs for persons with special needs will be met as they apply for rehabilitation loans. The City will continue to document, as it has in the past, the disability and elderly status of those receiving rehabilitation loans.

No other federal, state, or local funds are expected to be available during this Program Year to meet identified needs.

Housing Opportunities for People With Aids (HOPWA)

This section is not applicable to the City of Oshkosh

Specific HOPWA Objectives

This section is not applicable to the City of Oshkosh

OTHER NARRATIVE

APPENDIX A
PUBLIC HEARING NOTICE

Notice of Public Hearing
City of Oshkosh
2010-2014 CDBG Program Consolidated Plan and
2010 CDBG Program Annual Plan

The City of Oshkosh will hold a public hearing on Thursday, July 1, 2010 at 6:00 PM at the Oshkosh Seniors Center, 200 N. Campbell Road, for the purpose of discussing the draft 2010-2014 Community Development Block Grant (CDBG) Program Consolidated Plan and the 2010 Community Development Block Grant (CDBG) Program Annual Plan.

The City of Oshkosh, as part of its status as an entitlement community receiving CDBG funds from the U.S. Department of Housing and Urban Development (HUD), develops a 5-year Consolidated Plan that examines the City's housing and community development. It also identifies priority needs and how CDBG funds could be used to assist in addressing them. The Plan also provides the basis to allocate annual funds and assess annual progress in identified needs.

The proposed use of the 2010 CDBG funds as shown in the table below is tentative until the City's 2010 Annual Plan is reviewed by the Common Council and approved by HUD.

Activities		Allocation
I.	Central City Redevelopment	\$190,756
II.	Housing/Neighborhood Development	\$410,397
III.	Public Services	\$140,000
IV.	Administration and Planning	\$188,500
Total 2010 CDBG Allocation		\$929,653

The City Plan Commission will review the consolidated plan on Tuesday, July 6, 2010 at 4:00 PM in Room 404, City Hall, 215 Church Avenue, Oshkosh, WI and the Oshkosh Common Council will also review the plan on Tuesday, July 13, 2010 at 6:00 PM in Room 406, City Hall, 215 Church Avenue, Oshkosh, WI.

Views and comments received during the hearing will be considered and included in the final draft of the Consolidated and Annual Plans that will be submitted to HUD. If persons planning on attending have specialized needs (interpreter, handicap accessibility, etc.), please contact the Department of Community Development at 920.236.5055.

The 2010-2014 Consolidated Plan and 2010 Annual Plan can be viewed at the Department of Community Development (Room 204, City Hall, 215 Church Avenue, Oshkosh, WI 54901), the Oshkosh Public Library (106 Washington Avenue, Oshkosh, WI) or on-line at http://www.ci.oshkosh.wi.us/Community_Development/Planning_Services.

Published: June 1, 2010

APPENDIX B
CERTIFICATIONS

APPENDIX C
HOUSING NEEDS TABLE

APPENDIX D

**CONTINUUM OF CARE HOMELESS POPULATION AND
SUBPOPULATIONS CHART**

APPENDIX E

HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES TABLE

APPENDIX F
NON-HOMELESS SPECIAL NEEDS TABLE

APPENDIX G
PROJECT WORKSHEETS

APPENDIX H
SUMMARY OF SPECIFIC ANNUAL OBJECTIVES

APPENDIX I
ANNUAL HOUSING COMPLETION GOALS

APPENDIX J
PROPOSED 2010 EXPENDITURES WORKSHEET

PROPOSED 2010 EXPENDITURES WORKSHEET

Activity	Estimated Funds Available	Proposed 2010 Expenditures	Previous 2009 Year PI	Estimated 2010 Year PI	Percent	CAP
Administration Expenditures		\$188,500		150,000	17.5%	20%
Public Services Expenditures (excluding NRSA PI expenditures)		\$140,000	149,309		13.0%	15%
NRSA* PS Expenditures		\$0			0.0%	
Total PS Expenditures		\$140,000			13.0%	
Total Non-LMI Expenditures (Including admin/planning)		\$389,256				
Total LMI Expenditures (Including all Public Service Expenditures)		\$690,397			77.5%	Must be >70%
						1 2 3 yrs**
Year's Grant Amount	\$929,653					
Previous Yr(s) Carryover Funds (including any PI from previous yr on hand)	\$0					
Total Funds Available	\$1,079,653					
Total Allocated Funds		\$1,079,653				
Unallocated Amount		\$0			0.0%	Must Be <10%
Total Worksheet Funds		\$1,079,653			94.9%	