

# Action Plan

**Grantee:** Canton, OH

**Grant:** B-11-MN-39-0002

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<b>LOCCS Authorized Amount:</b>	\$ 1,233,756.00
<b>Grant Award Amount:</b>	\$ 1,233,756.00
<b>Status:</b>	Reviewed and Approved
<b>Estimated PI/RL Funds:</b>	\$ 79,415.19
<b>Total Budget:</b>	\$ 1,313,171.19

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## Funding Sources

**No Funding Sources Found**

## Narratives

### Summary of Distribution and Uses of NSP Funds:

The City of Canton has utilized criteria determined by HUD prioritizing the area of greatest need. Also, the city used information from "The Canton Neighborhood Project," a report issued by David Boehlke. This report sets both specific plans and goals for specific neighborhoods and a more general framework through which to plan and implement neighborhood revitalization throughout the city. The city will meet the 25% set aside requirement for providing housing for individuals or families whose incomes do not exceed 50% of AMI by providing funding for homebuyer and rental housing restricted to households with incomes at or below 50% of AMI level. Funds will be used to acquire, rehab and redevelop homes. Ten percent of grant funds will be used for inspection of properties; board-up of vacant properties to ensure public safety; delivery costs, ie legal ads, title searches; demolition and removal of debris from blighted structures. Ten percent of grant funds will provide administration of the Neighborhood Stabilization Program, including but not limited to personnel and strategic planning mechanisms. Remaining funds will be used to acquire, rehab and redevelopment homes for individuals and families whose incomes may exceed 50% of AMI, but will not exceed 120% of AMI. Total low-income set-aside percentage (must be no less than 25 percent): 25.00% Total funds set aside for low-income individuals = \$308,439.00 The city will meet low income target by providing funding for homebuyer and rental housing restricted to households with incomes at or below 50% of AMI. Affordability will be maintained through affordability guidelines as described herein. The number of NSP affordable housing units made available to low-, moderate-, and middle-income households - i.e. 120% of area median income - reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).

### How Fund Use Addresses Market Conditions:

See attachment

### Ensuring Continued Affordability:

Long term affordability will be ensured using the recapture provision provided in HOME. The Housing Economic Recovery Act provides direction as to the requirements of protecting affordability. Deed restrictions and/or security instruments will be recorded to protect the integrity of HOME rules. The properties will be subject to subsidy recapture for no less than 5 years for a subsidy under \$15,000, for 10 years for a subsidy from \$15,000 to \$40,000, and 15 years for a subsidy over \$40,000.



### **Definition of Blighted Structure:**

The city will utilize the definition in section 1.08 of the Ohio Revised Code: (A) "Blighted areas" and "slum" mean an area in which seventy percent of the parcels are blighted parcels and those blighted parcels substantially impair or arrest the sound growth of the state or a political subdivision of the state, retard the provision of housing accommodations, constitute an economic or social liability or are a menace to the public health, safety, morals, or welfare in their present condition and use. (B) "Blighted parcel" means either of the following: (1) A parcel that has one or more of the following conditions: (a) A structure that is dilapidated, unsanitary, unsafe, or vermin infested and that because of its condition has been designated by an agency that is responsible for the enforcement of housing, building or fire codes as unfit for human habitation or use; (b) The property poses a direct threat to public health or safety in its present condition by reason of environmentally hazardous conditions, solid waste pollution or contamination; (c) Tax or special assessment delinquencies exceeding the fair market value of the land that remain unpaid thirty-five days after notice to pay has been mailed. (2) A parcel that has two or more of the following conditions that, collectively considered, adversely affect surrounding or community property values or entail land use relationships that cannot reasonably be corrected through existing zoning codes or other land use regulations: (a) Dilapidation and deterioration; (b) Age and obsolescence; (c) Inadequate provision for ventilation, light, air, sanitation or open spaces; (d) Unsafe and unsanitary conditions; (e) Hazards that endanger lives or properties by fire or other causes; (f) Noncompliance with building, housing or other codes; (g) Nonworking or disconnected utilities; (h) Is vacant or contains an abandoned structure; (i) Excessive dwelling unit density; (j) Is located in an area of defective or inadequate street layout; (k) Overcrowding of buildings on the land; (l) Faulty lot layout in relation to size, adequacy, accessibility or usefulness; (m) Vermin infestation; (n) Excessive damage or destruction caused by a major disaster when the damage has not been remediated within a reasonable time; (o) Identified hazards to health and safety that are conducive to ill health, transmission of disease, juvenile delinquency or crime; (p) Ownership or multiple ownership of a single parcel when the owner, or a majority of owners of a parcel in the case of multiple ownership, cannot be located. (C) When determining whether a property is a blighted parcel or whether an area is a blighted area or slum for the purpose of this section, no person shall consider whether there is a comparatively better use for any premises, property, structure, area, or portion of an area, or whether the property could generate more tax revenues if put to another use. (D)(1) Notwithstanding any other provision of this section, absent any environmental or public health hazard that cannot be corrected under its current use or ownership, a property is not a blighted parcel because of any condition listed in division (B) of this section if the condition is consistent with conditions that are normally incident to generally accepted agricultural practices and the land is used for agricultural purposes as defined in section 303.01 or 519.01 of the Revised Code, or the county auditor of the county in which the land is located has determined under section 5713.31 of the Revised Code that the land is "land devoted exclusively to agricultural use" as defined in section 5713.30 of the Revised Code. (2) A property that under division (D)(1) of this section is not a blighted parcel shall not be included in a blighted area or slum. Effective date: 2007 SB7 10-10-2007

### **Definition of Affordable Rents:**

For units that are set aside for households with incomes at or below 50% Area Median Income, the maximum rent charged will be the Low HOME Rent as determined by HUD adjusted for any tenant-paid utilities.

For units occupied by households with incomes from 51% to 80% Area Median Income, the maximum rent charged will be the High HOME Rent as determined by HUD adjusted for any tenant-paid utilities.

For units occupied by households with incomes from 81% to 120% Area Median Income, the maximum rent charged will be the High HOME Rent as determined by HUD adjusted for any tenant-paid utilities.

### **Housing Rehabilitation/New Construction Standards:**

The city's housing rehabilitation and new construction standards for the HOME program will be adapted to the NSP program. These standards will be provided to city staff and developers, based on the special requirements and conditions of NSP, which encourages modernization of existing homes and incorporation of green building standards. As with the city's current rehab program standards, the revised version will continue to require compliance with the city's housing, building, and zoning codes as well as the Ohio Rehabilitation Standards.

### **Vicinity Hiring:**

Developers awarded funding will make every effort to comply with this requirement by working with Project REBUILD (Youthbuild) to employ youth who live in the area.

The city will, to the maximum extent feasible, provide for hiring of employees that reside in the vicinity of NSP3 funded projects or contract with small businesses that are owned and operated by person residing in the vicinity of NSP3 projects.

### **Procedures for Preferences for Affordable Rental Dev.:**

This requirement will be met by working with an area CHDO that specializes in rental projects.

### **Grantee Contact Information:**

Susan Graham  
susan.graham@cantonohio.gov  
330-438-4118  
218 Cleveland Ave SW  
Canton, OH 44702



## Project Summary

Project #	Project Title	Grantee Activity #	Activity Title
9999	Restricted Balance	<i>No activities in this project</i>	
9999	Restricted Balance	<i>No activities in this project</i>	
NSP3-Admin	Administration	NSP3-2213-Admin	Administration of NSP3
NSP3-B	Acquisition, Rehab,	NSP3-2213-B-Homebuyer	Rehab and Redevelopment of Properties for Sale
		NSP3-2213-B-Rental	Rehab and Redevelopment of Properties for Rent
NSP3-B 25%	Acquisition, Rehab,	NSP3-2213-B-25 Rental	25% Set aside
		NSP3-2213-B25-Homebuyer	25% Set-Aside
NSP3-Demolition	Demolition	NSP3-2213-D	Demolition and Related Expenses



# Activities

**Project # / NSP3-Admin / Administration**

**Grantee Activity Number:** NSP3-2213-Admin  
**Activity Title:** Administration of NSP3

**Activity Type:**

Administration

**Project Number:**

NSP3-Admin

**Projected Start Date:**

03/01/2011

**Project Draw Block by HUD:**

Not Blocked

**Activity Draw Block by HUD:**

Not Blocked

**Block Drawdown By Grantee:**

Not Blocked

**National Objective:**

Not Applicable - (for Planning/Administration or Unprogrammed Funds only)

**Benefit Report Type:**

NA

**Activity Status:**

Under Way

**Project Title:**

Administration

**Projected End Date:**

03/01/2013

**Project Draw Block Date by HUD:**

**Activity Draw Block Date by HUD:**

**Total Budget:** \$ 121,307.63

**Most Impacted and Distressed Budget:** \$ 0.00

**Other Funds:** \$ 0.00

**Total Funds:** \$ 121,307.63

**Activity is being carried out by**

No

**Activity is being carried out through:**

**Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:**

**Responsible Organization**

City of Canton Department of Development

**Organization Type**

Local Government

**Proposed Budget**

\$ 121,307.63



**Location Description:**

Administration will take place at Canton City Hall, 5th floor, 218 Cleveland Ave. SW, Canton, OH 44702.

**Activity Description:**

CDBG eligible use: 24 CFR 5703206 Administration and Planning  
Administering the Neighborhood Stabilization Program, including but not limited to personnel and strategic planning mechanisms.

**Environmental Assessment:** EXEMPT

**Environmental** None

**Project # / NSP3-B / Acquisition, Rehab, Redevelopment**

**Grantee Activity Number:** NSP3-2213-B-Homebuyer  
**Activity Title:** Rehab and Redevelopment of Properties for Sale

**Activity Type:**  
Rehabilitation/reconstruction of residential structures

**Project Number:**  
NSP3-B

**Projected Start Date:**  
03/01/2011

**Project Draw Block by HUD:**  
Not Blocked

**Activity Draw Block by HUD:**  
Not Blocked

**Block Drawdown By Grantee:**  
Not Blocked

**National Objective:**  
LMMI: Low, Moderate and Middle Income National Objective for NSP Only

**Benefit Report Type:**  
Direct (Households)

**Activity Status:**  
Under Way  
**Project Title:**  
Acquisition, Rehab, Redevelopment

**Projected End Date:**  
03/01/2013  
**Project Draw Block Date by HUD:**

**Activity Draw Block Date by HUD:**

**Total Budget:** \$ 556,056.57  
**Most Impacted and Distressed Budget:** \$ 0.00  
**Other Funds:** \$ 0.00  
**Total Funds:** \$ 556,056.57

**Program Income Account:**  
NSP3-2013-B-1



<b>Proposed Beneficiaries</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Low/Mod%</b>
# Owner Households	5	1	4	100.00
# of Households	5	1	4	100.00

<b>Proposed Accomplishments</b>	<b>Total</b>
# of Singlefamily Units	5
# of Housing Units	5
#Units w other green	5
#Sites re-used	5
#Units exceeding Energy Star	5
#Units with bus/rail access	5
#Low flow showerheads	5
#Low flow toilets	5
#Light fixtures (outdoors) replaced	5
#Light Fixtures (indoors) replaced	5
#Replaced hot water heaters	5
#Replaced thermostats	5
#Efficient AC added/replaced	5
#High efficiency heating plants	5
#Additional Attic/Roof Insulation	5
#Energy Star Replacement Windows	5
# of Properties	5

**Activity is being carried out by**

No

**Activity is being carried out through:**

**Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:**

<b>Responsible Organization</b>	<b>Organization Type</b>	<b>Proposed Budget</b>
City of Canton Department of Development	Local Government	\$ 556,056.57

**Location Description:**

Rehabilitation and redevelopment of properties for sale will occur in the target area.

**Activity Description:**

CDBG eligible use: 24 CFR 570.202 Rehabilitation/Redevelopment and preservation activities for homes  
 24 CFR 570.202 (n) Home ownership assistance  
 Homeownership and lease-purchase: The activity will be rehabilitation and redevelopment of residential properties for low, moderate and middle income buyers. Rehabilitation is for foreclosed or abandoned residential properties. Redevelopment is for vacant residential properties. This activity will occur in blocks where vacancy, abandonment, foreclosure or risk of foreclosure are apparent. This project will produce an estimated two rehabilitated or newly constructed homes for purchase by households with income up to 120% of area median income (AMI), with expected household incomes ranging from 50% to 120% of AMI. Each eligible homebuyer benefitting from the NSP program will receive a minimum of 8 hours of counseling. Homes will be sold at market



value or cost, whichever is less. Selling homes at market value may involve an NSP "development subsidy" if the cost of development exceeds market value due to the need for code-related improvements and improvements to enhance marketability and neighborhood improvements. This program may further improve affordability by offering a NSP-funded second mortgage at 0% interest, with payments due only on sale. The second mortgage mechanism may be used to provide additional cash down payment assistance if necessary. Long-term affordability will be protected through lien mechanisms based on the amount of subsidy as required by the HOME program rules, with liens forgiven within a 15-year period. The subsidies not part of the development subsidy or subsidies forgiven on a pro-rata basis during the term of the lien will be due back to the city upon sale or change in ownership. The city will accomplish this task by collaboration with community partners in the private and public sector. The city's investment may leverage dollars from the developer partners. This dollar amount leveraged is unknown at this time.

**Environmental Assessment:** COMPLETED

**Environmental** None



**Grantee Activity Number: NSP3-2213-B-Rental**  
**Activity Title: Rehab and Redevelopment of Properties for Rent**

**Activity Type:**  
 Rehabilitation/reconstruction of residential structures

**Project Number:**  
 NSP3-B

**Projected Start Date:**  
 03/01/2011

**Project Draw Block by HUD:**  
 Not Blocked

**Activity Draw Block by HUD:**  
 Not Blocked

**Block Drawdown By Grantee:**  
 Not Blocked

**National Objective:**  
 LMMI: Low, Moderate and Middle Income National Objective for NSP Only

**Activity Status:**  
 Under Way

**Project Title:**  
 Acquisition, Rehab, Redevelopment

**Projected End Date:**  
 03/01/2013

**Project Draw Block Date by HUD:**

**Activity Draw Block Date by HUD:**

**Total Budget:** \$ 131,472.69

**Most Impacted and Distressed Budget:** \$ 0.00

**Other Funds:** \$ 0.00

**Total Funds:** \$ 131,472.69

**Benefit Report Type:**  
 Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Renter Households	1	1		100.00
# of Households	1	1		100.00

Proposed Accomplishments	Total
# of Singlefamily Units	1
# of Housing Units	1
#Units 2 other green	1
#Units deconstructed	1
#Sites re-used	1
#Units with bus/rail access	1
#Low flow showerheads	1
#Low flow toilets	1
#Light fixtures (outdoors) replaced	1
#Light Fixtures (indoors) replaced	1
#Replaced hot water heaters	1
#Replaced thermostats	1
#Efficient AC added/replaced	1
#High efficiency heating plants	1



#Energy Star Replacement Windows 1  
# of Properties 1

**Activity is being carried out by**

No

**Activity is being carried out through:**

**Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:**

Responsible Organization	Organization Type	Proposed Budget
City of Canton Department of Development	Local Government	\$ 131,472.69

**Location Description:**

Rehabilitation and redevelopment of properties for rental units will occur in the target areas.

**Activity Description:**

CDBG eligible use: 24 CFR 570.202 Rehabilitation/Redevelopment and preservation activities for homes  
24 CFR 570.202 (n) Home ownership assistance  
This project will result in one rental unit. The activity will be rehabilitation and/or redevelopment of residential property for low-, moderate- and middle- income renters. Rehabilitation is for foreclosed or abandoned residential properties. Redevelopment is for abandoned residential properties. This activity will occur in blocks where vacancy, abandonment, foreclosures or risk of foreclosure are apparent. This project will produce one rehabilitated or newly constructed home for rent by households with income up to 120% of area median income (AMI), with expected household income ranging from 60% to 120% of AMI. The city will accomplish this task by collaboration with community partners in the private and public sector. This city's investment may leverage dollars from the developer partners. The dollar amount leveraged is unknown at this time.

**Environmental Assessment:** COMPLETED

**Environmental** None

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**Project # / NSP3-B 25% / Acquisition, Rehab, Redevelopment**

**Grantee Activity Number:** NSP3-2213-B-25 Rental  
**Activity Title:** 25% Set aside

**Activity Type:**  
Rehabilitation/reconstruction of residential structures

**Activity Status:**  
Completed



**Project Number:**

NSP3-B 25%

**Projected Start Date:**

03/01/2011

**Project Draw Block by HUD:**

Not Blocked

**Activity Draw Block by HUD:**

Not Blocked

**Block Drawdown By Grantee:**

Not Blocked

**National Objective:**

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

**Project Title:**

Acquisition, Rehab, Redevelopment

**Projected End Date:**

03/01/2013

**Project Draw Block Date by HUD:****Activity Draw Block Date by HUD:****Total Budget:** \$ 108,775.58**Most Impacted and Distressed Budget:** \$ 0.00**Other Funds:** \$ 0.00**Total Funds:** \$ 108,775.58**Benefit Report Type:**

Direct (Households)

**Proposed Beneficiaries**

	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Low/Mod%</b>
# Renter Households	1	1		100.00
# of Households	1	1		100.00

**Proposed Accomplishments**

	<b>Total</b>
# of Singlefamily Units	1
# of Housing Units	1
#Units $\geq$ other green	1
#Units deconstructed	1
#Sites re-used	1
#Units with bus/rail access	1
#Low flow showerheads	1
#Low flow toilets	1
#Refrigerators replaced	1
#Light fixtures (outdoors) replaced	1
#Light Fixtures (indoors) replaced	1
#Replaced hot water heaters	1
#Replaced thermostats	1
#Efficient AC added/replaced	1



#High efficiency heating plants	1
#Energy Star Replacement Windows	1
# of Properties	1

**Activity is being carried out by**

No

**Activity is being carried out through:**

**Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:**

Responsible Organization	Organization Type	Proposed Budget
City of Canton Department of Development	Local Government	\$ 108,775.58

**Location Description:**

Rehabilitation and redevelopment of properties will occur in the target area.

**Activity Description:**

CDBG eligible use: 24 CFR 570.202 Rehabilitation/Redevelopment and preservation activities for homes  
 24 CFR 570.202 (n) Home ownership assistance  
 For renter or special needs households with incomes up to 50% AMI, the project will result in an estimated three rental units. The activity will be rehabilitation and/or redevelopment of residential properties for low-income renters. Rehabilitation is for foreclosed or abandoned residential properties. Redevelopment is for vacant residential properties. This activity will occur in blocks where vacancy, abandonment, foreclosures or risk of foreclosure are apparent. This project will produce an estimated three rehabilitated or newly constructed homes for rent by households with income up to 50% of area median income (AMI). The city will accomplish this task by collaboration with community partners in the private and public sector. This city's investment may leverage dollars from the developer partners. The dollar amount leveraged is unknown at this time.

**Environmental Assessment:** COMPLETED

**Environmental** None



**Grantee Activity Number: NSP3-2213-B25-Homebuyer**  
**Activity Title: 25% Set-Aside**

**Activity Type:**

Rehabilitation/reconstruction of residential structures

**Project Number:**

NSP3-B 25%

**Projected Start Date:**

03/01/2011

**Project Draw Block by HUD:**

Not Blocked

**Activity Draw Block by HUD:**

Not Blocked

**Block Drawdown By Grantee:**

Not Blocked

**National Objective:**

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

**Activity Status:**

Under Way

**Project Title:**

Acquisition, Rehab, Redevelopment

**Projected End Date:**

03/01/2013

**Project Draw Block Date by HUD:**

**Activity Draw Block Date by HUD:**

**Total Budget:** \$ 275,713.20

**Most Impacted and Distressed Budget:** \$ 0.00

**Other Funds:** \$ 0.00

**Total Funds:** \$ 275,713.20

**Benefit Report Type:**

Direct (Households)

**Proposed Beneficiaries**

	Total	Low	Mod	Low/Mod%
# Owner Households	2	2		100.00
# of Households	2	2		100.00

**Proposed Accomplishments**

	Total
# of Singlefamily Units	2
# of Housing Units	2
#Units $\geq$ other green	2
#Units deconstructed	2
#Sites re-used	2
#Units with bus/rail access	2
#Low flow showerheads	2
#Low flow toilets	2
#Refrigerators replaced	2
#Light fixtures (outdoors) replaced	2
#Light Fixtures (indoors) replaced	2
#Replaced hot water heaters	2
#Replaced thermostats	2
#Efficient AC added/replaced	2



#High efficiency heating plants	2
#Energy Star Replacement Windows	2
# of Properties	2

**Activity is being carried out by**

No

**Activity is being carried out through:**

**Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:**

Responsible Organization	Organization Type	Proposed Budget
City of Canton Department of Development	Local Government	\$ 275,713.20

**Location Description:**

Rehabilitation and redevelopment of properties will occur in the target area.

**Activity Description:**

CDBG eligible use: 24 CFR 570.202 Rehabilitation/Redevelopment and preservation activities for homes  
24 CFR 570.202 (n) Home ownership assistance

The project will result in an estimated two homebuyer units. The activity will be rehabilitation and/or redevelopment of residential properties for low-income homebuyers. Rehabilitation is for foreclosed or abandoned residential properties. Redevelopment is for vacant residential properties. This activity will occur in blocks where vacancy, abandonment, foreclosures or risk of foreclosure are apparent. This project will produce an estimated two rehabilitated or newly constructed homes for rent by households with income up to 50% of area median income (AMI).

The city will accomplish this task by collaboration with community partners in the private and public sector. This city's investment may leverage dollars from the developer partners. The dollar amount leveraged is unknown at this time.

**Environmental Assessment:** COMPLETED

**Environmental** None

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**Project # / NSP3-Demolition / Demolition**

**Grantee Activity Number:** NSP3-2213-D  
**Activity Title:** Demolition and Related Expenses



**Activity Type:**

Clearance and Demolition

**Project Number:**

NSP3-Demolition

**Projected Start Date:**

03/01/2011

**Project Draw Block by HUD:**

Not Blocked

**Activity Draw Block by HUD:**

Not Blocked

**Block Drawdown By Grantee:**

Not Blocked

**National Objective:**

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

**Benefit Report Type:**

Area Benefit (Census)

**Activity Status:**

Under Way

**Project Title:**

Demolition

**Projected End Date:**

03/01/2013

**Project Draw Block Date by HUD:****Activity Draw Block Date by HUD:****Total Budget:** \$ 119,845.52**Most Impacted and Distressed Budget:** \$ 0.00**Other Funds:** \$ 0.00**Total Funds:** \$ 119,845.52**Proposed Accomplishments**

# of Singlefamily Units

**Total**

18

# of Housing Units

18

LMI%:

55.15

**Activity is being carried out by**

No

**Activity is being carried out through:****Organization carrying out Activity:**

City of Canton Department of Development

**Proposed budgets for organizations carrying out Activity:****Responsible Organization**

City of Canton Department of Development

**Organization Type**

Local Government

**Proposed Budget**

\$ 119,845.52

**Location Description:**

Demolition and board up of blighted properties in the NSP target area.



## Activity Description:

CDBG eligible use: 24 CFR 570.201 Clearance for blighted structures only  
Inspection of properties; board-up of vacant properties to ensure public safety; delivery costs, ie legal ads, title searches,; demolition and removal of debris from blighted structures.

**Environmental Assessment:** COMPLETED

**Environmental** None

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## Action Plan Comments:

- Reviewer - DRGR Action Plan is rejected as the jurisdiction did not transfer or use the same narrative the following information from the submitted hard copy plan with agreement signed on 3/4/2011 to the DRGR Action Plan: 1) Data source used to determine the areas of greatest needs; 2) Procedures for affordable rental development, low income targeting, and Meeting low income target; 3) Demolition or conversion of LMI units, 4) Public participation plan and summary of citizen comments, 5) Citation of related CDBG activity under each activity description; 6) Vicinity Hiring language as stated in the submitted hard copy plan in certification; 7) Admin, Demolition, Rehab/redevelopment Activities should have responsible organization under Activity is carrying out by and Activity is carrying out through; 8) 25% Set-aside activity description should be same as of the approved hard copy plan; and 9) Rehab/redevelopment activity Proposed housing accomplishment Number of housing units should be 4 not 24. OA 4/1/2011
- Reviewer - The following topics from the submitted hard copy plan with agreement signed on 3/4/2011 are missing on the DRGR Action Plan: Demolition of LMI units; Public participation plan and Public comments summary. These topics should be placed under the heading of How Fund Use Addresses Market Conditions. -OA 4/6/2011
- Reviewer - Jurisdiction transferred information from submitted hard copy plan with grant agreement signed on 3/4/2011 to DRGR Action Plan. Despite some narratives (i.e. Data source used to determine areas of greatest needs and Procedures for affordable rental development) being partially placed under different headings (i.e. Summary of distribution of funds and How fund use addresses market condition), city met the minimum standard by providing all the required information. DRGR Action Plan is acceptable. -OA 4/6/2011
- Reviewer - Approved - TB - 4/7/11
- Reviewer - City updated the Beneficiaries Performance Measures for activity 2213-D Demolition and Related Expenses per FO request. Update is acceptable. -OA 12/28/2012
- Reviewer - Recommend Approval: RTH 1/2/13
- Reviewer - Admin and Demo are within the caps established for NSP 3. Activities within budget. Recommend Approval. BW 10/13/14



- Reviewer - No issues found. Grantee added PI and changed the affordable rent definition. Recommend Approval. BW 4/19/18
- Reviewer - Canton added PI to the budgets. No other changes made. BW 9/28/18
- Reviewer - Canton added PI to the budgets for the NSP-3 grant. No issues found. Reports will be reviewed on Monday to see if any changes are needed. Recommend Approval. BW 10/26/18
- Reviewer - City needed to add estimated PI so that they could move forward with revising their plan for closeout. Recommend Approval. BW 12/7/18
- Reviewer - Canton made revisions to their action plan to more accurately show the activities undertaken by the NSP-3 dollars. The city is looking to closeout early in 2019. Recommend Approval. BW 12/14/18
- Reviewer - Canton changed beneficiary data and items such as environmental status. No budget changes. Recommend Approval. BW 2/12/19
- Reviewer - City changed demolition activity in anticipation of closeout and to correct items from DRGR Clean Up Report. Recommend Approval. 5/3/19
- Reviewer - Canton changed budgets. Caps remained the same and no issues were discovered. Recommend Approval. BW 10/18/19
- Reviewer - Canton changed one activity from under way to completed. No other changes made. Recommend Approval. BW 4/20/20

## Action Plan History

Version	Date
B-11-MN-39-0002 AP#1	04/07/2011
B-11-MN-39-0002 AP#2	01/02/2013
B-11-MN-39-0002 AP#3	10/14/2014
B-11-MN-39-0002 AP#4	04/19/2018
B-11-MN-39-0002 AP#5	09/28/2018
B-11-MN-39-0002 AP#6	10/26/2018
B-11-MN-39-0002 AP#7	12/07/2018
B-11-MN-39-0002 AP#8	12/14/2018
B-11-MN-39-0002 AP#9	02/12/2019
B-11-MN-39-0002 AP#10	05/03/2019
B-11-MN-39-0002 AP#11	10/18/2019
B-11-MN-39-0002 AP#12	04/20/2020

