



2020-2024 Consolidated Plan and 2021-2022 Action Plan DRAFT

2nd Substantial Amendment – Neighborhood
Revitalization Strategy Areas (NRSAs)

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Background Summary

The City of Toledo Department of Housing and Community Development (DHCD) is herewith making a 2nd substantial amendment to its 2020-2024 Five Year Consolidated Plan and the 2021-2022 Annual Action Plan covering the period of July 1, 2021 - June 30, 2022. This change affects both the U. S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) and the Neighborhood Revitalization Strategy Areas (NRSAs).

The City of Toledo, an entitlement city, receives annual grant allocations from the HUD through the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnership Program (HOME). The overall purpose of the CDBG, ESG and HOME programs is to assist low- and moderate-income families and households. The funds are used to pursue three goals:

- Provide decent, affordable housing;
- Create suitable living environments; and
- Expand economic opportunities.

In order to access these federal funds, the City must carry out a planning process, called the Consolidated Plan, to identify the scope of housing and community development needs in its jurisdiction and how the available funding can best be used to meet those needs. The Five-Year Consolidated Plan term began on July 1, 2020 and concludes on June 30, 2025. A full copy of the Five-Year Consolidated Plan is available for review at the City of Toledo's Department of Housing and Community Development and also on the City's website.

Each year, the City of Toledo prepares an Annual Action Plan that describes the projects and actions it will undertake to carry out the strategies identified in the Five-Year Consolidated Plan.

The CDBG program allows entitlement grantees to designate local target areas for revitalization and develop comprehensive approaches to address community development and housing needs in those designated neighborhoods or Neighborhood Revitalization Strategy Areas (NRSAs). The entitlement grantee must apply to HUD for designation of a NRSA and approval of the comprehensive revitalization approach. Communities with HUD approved NRSAs are offered enhanced flexibility in undertaking economic development, housing and public service activities with CDBG funds. This flexibility is designed to promote innovative programs and enhance revitalization of targeted underserved areas.

The City of Toledo proposes to make application to HUD for the designation of two Neighborhood Revitalization Strategy Areas (NRSAs) located in the Old South End and Englewood Neighborhoods; and for the use of federal funds for eligible activities in the designated NRSAs. This requires a 2nd Substantial Amendment to the 2020-2024 Five-Year Consolidated Plan and the 2021-2022 Annual Action Plan.

Introduction

The 2nd Substantial Amendment was prepared per 24 CFR part 91.505 - Amendments to the Five-Year Consolidated Plan.

- A. Proposed changes of the 2nd Substantial Amendment to the PY 2020-2024 Five-Year Consolidated Plan and 2020-2021 Annual Action Plan includes:

2020-2024 Five-Year Consolidated Plan
Substantial Amendment #2 - **DRAFT**

1. To make application to HUD for the designation of two Neighborhood Revitalization Strategy Areas (NRSAs) located in the Old South End and Englewood Neighborhoods and for the use of federal funds for eligible activities in the designated NRSAs.

B. Required Contents of Substantial Amendments

1. Standard Forms SF-424 and SF-424D
2. Summary of Consultation Process
3. Summary of Citizen Participation Process
4. Proposed Activity
5. Proposed Application
6. Certifications

A. *Proposed Substantial Amendment Changes*

The City is proposing the following 2nd amendment to the 2020-2024 Five-Year Consolidated Plan and the 2021-2022 Annual Action Plan:

1. Make application to HUD to designate two NRSAs located in the Old South End and Englewood Neighborhoods; and use of federal funds for eligible activities in designated NRSAs.

The City is proposing the following 2nd amendment to the 2020-2024 Five-Year Consolidated Plan and 2021-2022 Annual Action Plan in order to add an eligible activity that was not previously identified:

1. To add two NRSAs located in the Old South End and Englewood Neighborhoods.

B. *Required Contents of Substantial Amendment*

1. *STANDARD FORMS SF-424 AND SF424D*

- a. The HUD forms SF-424 and SF-424D are attached for the final submission of the amendment

2. *SUMMARY OF CONSULTATION PROCESS*

Summary of Consultation Process

Community participation was a critical component of the NRSA development process. The NRSA strategy was developed in consultation with a wide array of stakeholders and started with the City's PY 2020-2024 Consolidated Plan process in October 2019. The city took a comprehensive approach and consulted with non-profit organizations, government agencies, housing providers, professional associations, neighborhood groups, the local public housing authority, the Fair Housing Center, and many other regional and local organizations engaged in housing, health, and community and economic development. The onset of COVID-19 pandemic, ultimately shut down services, closed businesses, and social distancing extended the planning process. Virtual meetings were used for public meetings and as a result, participation increased.

Starting with the program year 2020 Consolidated Plan, the idea of the Neighborhood Revitalization Strategy Area (NRSA) was introduced to residents and stakeholders. Ten (10) potential areas were identified for consideration. A Consolidated Plan (CON PLAN) Steering Committee was established to provide input and its members were consulted in developing the NRSA plan. This committee was comprised of representatives from a variety of local and regional stakeholders.

Additionally, the Department of Housing and Community Development consulted with the HUD field office regarding the NRSA as required in the CPD Notice 16-16 by way of letters, emails and meetings. As a result of the consultations and HUD NRSA eligibility criteria, the Old South End and Englewood areas were selected as the proposed NRSAs. The NRSA draft plan will be available for public view and comment prior to submission to HUD for final approval.

3. SUMMARY OF CITIZEN PARTICIPATION PROCESS

Summary of Citizen Participation Process

In accordance with HUD federal regulations CFR 91.105 and 91.200, the City of Toledo maintains a Citizen's Participation Plan (CPP). The CPP's ensures that the City of Toledo solicits and utilizes input from citizens, community agencies and beneficiaries, allowing full participation at all levels such that allocation and utilization of HUD funds are conducted in an open manner with freedom of access for all interested individuals. The timeline for the Substantial Amendment is below.

2022

Sunday, September 4, 2022	Public Notice <i>published</i> in The Blade for the 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application 30-day public comment period.
Wednesday, September 7, 2022	Public Notice <i>published</i> in the Sojourners Truth and La Prensa for the 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application 30-day public comment period.
Wednesday, September 7, 2022	Press Release on the availability of the 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application 30-day public comment period sent to Mayor's Office for distribution on News and Social Medias. Announcement sent to Third-Party Partners, LMH and other local organizations.
Monday, September 26, 2022	Draft 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application completed.
Monday, September 26, 2022	Submit Legislation to Mayor's Office
Tuesday, September 27, 2022	Distribute Draft 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application to public locations and post to City's website.
Wednesday, September 28, 2022	2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application 30-day public comment period begins.
Thursday, September 29, 2022	Public Hearing @ 5:30 p.m. via Zoom (Zoom Meeting scheduled)
Tuesday, October 4, 2022	City Council - Agenda Review of Legislation @ 2:00 p.m.
Tuesday, October 11, 2022	City Council - 1 st Reading and Passage of Legislation @ 4:00 p.m.

Thursday, October 27 , 2022	2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application 30-day public comment period ends.
Friday, October 28 , 2022	2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application finalized, printed for distribution and ready for electronic submission to HUD .
Monday, October 31 , 2022	FINAL 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application distributed to designated locations for website posting and posted to City's website.
Tuesday, November 1 , 2022	FINAL 2020-2024 Consolidated Plan, 2021-2022 Action Plan Substantial Amendment and Neighborhood Revitalization Strategy Areas (NRSAs) Application submitted to HUD .

Summary of Public Comments

The city of Toledo will accept all written comments as to the content of the 2nd substantial amendment and incorporate same to this document.

1. A virtual public hearing will be held to review the proposed 2nd Substantial Amendment changes. Copies of the proposed changes is available electronically on the Department of Housing and Community Development's website. The public notice and press release will be sent via email to local community partner's and the COT's Third-Party Partners.

All in-person Public Hearings are held in facilities that provide adequate accessibility to disabled individuals, are wheelchair accessible and provide handicapped parking. In the event of a virtual public hearing, services needed by disabled individuals are provided upon request.

4. PROPOSED ACTIVITY

Neighborhood Revitalization Strategy Areas (NRSAs)

The City intends to make application to the U. S. Department of Housing and Urban Development (HUD) for the use of federal funds to create two Neighborhood Revitalization Strategy Areas (NRSAs) located in the Old South End and Englewood Neighborhoods.

The purpose of the NRSA approach is to focus the COT's federal CDBG funds in a more flexible fashion than would otherwise be possible and leverage them for greater impact to the community. Job Creation would be more easily achieved and public service funding and housing activities would be free of some of the federal restrictions that accompany the CDBG program.

Below is a brief description of the two proposed NRSAs:

Old South End NRSA

The first proposed NRSA, is the Old South End, which is located on the south side of the City in an area bounded by the Anthony Wayne Trail, the Maumee River, and an Interstate. Broadway Street, is a major urban thoroughfare, it bisects the neighborhood and is lined with commercial, institutional and residential land uses. The Old South End has a neighborhood masterplan which was prepared in 2017 for the Broadway Corridor Coalition. The master plan has recently been updated.

Englewood NRSA

The second proposed NRSA, is the Englewood Neighborhood, which is located west of the downtown area and is bounded by West Snead Avenue to the west, I-75 to the north, Monroe/Collingwood to the east and Dorr Street to the south. The Englewood Area has recently completed a neighborhood master plan.

NRSA Requirements

In accordance with HUD guidance contained in the CPD Notice 16-16, a NRSA designation must meet the criteria below in order to receive HUD's approval. The city of Toledo's two proposed NRSAs meet all the required criteria.

- Identified neighborhood boundaries of the NRSAs must be contiguous.
- Identified neighborhoods must be primarily residential and have a low/mod percent equal to the "upper quartile percentage" or 70% for Toledo.
- Selection of areas must be based on documented input from area's stakeholders, including residents, business operators, financial institutions, nonprofits, and community groups. Documentation must include a description of outreach methods and a description of how the needs and concerns of stakeholders (especially residents) were incorporated into the plan.
- Selection of the NRSAs must be based on an assessment of economic conditions, opportunities for economic development and anticipated barriers and challenges.
- The implementation plan must promote the area's economic progress with a focus on activities that will create economic opportunities for low- to moderate-income residents of the NRSAs.
- The NRSA Plan must identify achievable benchmarks over the period of the designation; and
- The NRSA Plan must be submitted as part of the Consolidated Plan. The subject NRSA request is submitted as an amendment to the City's prior approved FY 2020-2024 Consolidated Plan.

Benefits of a HUD approved NRSA

Amendments to the Community Development Block Grant (CDBG) regulations at 24 CFR 570, which were published in the Federal Register on January 5, 1995, and updated in the final rule changes published in the November 9, 1995, Federal Register, described the NRSA benefits. They include:

1. **Job Creation/Retention as Low/Moderate Income Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take or are considered for such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i).
2. **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy can be a part of a single structure for purposes of applying the low and moderate-income national objective criteria. This provides a greater flexibility to conduct housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii).
3. **Aggregate Public Benefit Standard Exemption:** Economic development activities conducted under the strategy may, at the grantee's option, be exempt from aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing record-keeping requirements related to the public benefit standard (24 CFR 570.209(b)(2)(v)(L) and (M).

4. **Public Service Cap Exemption:** Public services conducted pursuant to the strategy by a Community Based Development Organization (CBDO) are exempt from the 15% public services cap (24 CFR 570.204(b)(2)(ii)).

NRSAs Benchmarks

Below is a summary of the goals and benchmarks the City plans to provide in the Old South End and Englewood NRSAs:

GOAL 1: Affordable Housing

Benchmarks: Build **173** affordable housing units (new units - 148, and acquisition/rehab units - 25) and repair **373** owner-occupied single-family houses (general repairs - 180 units, roof repairs - 150 units, and lead paint/weatherization - 43 units). Convert 55 low-income housing tax credit S/F rentals into homeowner units. The goal is to increase the supply of affordable housing and improve the affordable housing stock for residents.

GOAL 2: Economic and Human Capital Development

Benchmarks: Create/retain 40 jobs and assist 20 small businesses/microenterprises. Support Broadway Business District through funding for minority, women, & disadvantaged businesses (M/W/DBE). Create 10 new business spaces. Increase workforce development services to 135 persons in the two NRSAs.

GOAL 3: Neighborhood Improvements and Capacity Building

Benchmarks: Improve infrastructure in commercial corridor. Increase in public services through possible two (2) community-based development organizations (CBDOs) to support the NRSA strategies. Demolition of 113 unsafe structures and start a code enforcement compliance funding pilot. Start a Neighborhood Capacity Building Institute for non-profit agencies and train 10 leaders of social service organizations from the NRSAs. Develop a working group coordinated by DHCD staff to assist with implementation in each NRSA.

NRSA Investments and Community Impacts

It is anticipated that the two NRSAs will attract private sector and other non-federal public sector investments and have the following impacts on the housing, economic development, and living environment of the two areas:

- An expanded economic base through improved business districts, the attraction of employers, workforce development, and job creation and retention.
- Improved neighborhood conditions through demolition, proactive code enforcement, and redevelopment of dilapidated properties.
- Increased neighborhood capacity through funding public services and implementation of a neighborhood leadership development program.
- Creation and preservation of affordable housing for a wider range of incomes and reduce the concentration of poverty.
- Facilitate housing for special needs population including the elderly who wish to remain in their homes in the neighborhood and manage gentrification.
- Improve and foster greater partnerships between residents, non-profits, financial institutions, and organizational stakeholders and investors.

The NRSA plan in the two areas will be implemented by an NRSA Redevelopment Coordinator from the DHCD to develop, coordinate, and manage an implementation working group in each of the NRSAs. Each working group will meet monthly and will consist of subcommittees to work on Housing, Economic Development, Neighborhood Improvements, and Public Services. The working groups will consist of residents, community leaders, representatives of non-profits, funders, major institutions, and other stakeholders.

The DHCD will institute a monitoring and reporting system that will provide orientation and training to CDBG subrecipients carrying out NRSA activities, monitor their performance, and ensure compliance. The NRSA Coordinator will provide citizens with ongoing opportunities for public input through at least an annual public meeting to report on the NRSA progress. NRSA accomplishments including the amount of other funding leveraged will be reported in the City's Consolidated Annual Performance Evaluation Report (CAPER).

Monitoring and Reporting

The Department of Housing and Community Development staff will be responsible for monitoring the performance of subrecipients and developers undertaking activities in each of the two NRSAs and compare that to the NRSA objectives and goals proposed in the PY 2022-2026 NRSA Application. The City's NRSA monitoring process will consist of ensuring that NRSA goals and objectives are clearly outlined in each CDBG agreement related to the NRSAs. The city will also identify the NRSA benchmarks that it expects to achieve for each program year in its Annual Action Plan.

AP-38 Project Summary**Project Summary Information**

48	Project Name	Neighborhood Revitalization Strategy Area (NRSA) - Old South End
	Target Area	City-wide
	Goals Supported	Targeted Neighborhood Home Repairs
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: TBD
	Description	Creation of Neighborhood Revitalization Strategy Areas (NRSAs) in the Old South End Neighborhood.
	Target Date	TBD
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Old South End
	Planned Activities	To make application for use of federal funds to create a Neighborhood Revitalization Strategy Areas (NRSAs) located in the Old South End Neighborhood.
48	Project Name	Neighborhood Revitalization Strategy Area (NRSA) - Englewood
	Target Area	City-wide
	Goals Supported	Targeted Neighborhood Home Repairs
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: TBD
	Description	Creation of Neighborhood Revitalization Strategy Area (NRSA) in the Englewood Neighborhood.
	Target Date	TBD
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	Englewood
	Planned Activities	To make application for use of federal funds to create a Neighborhood Revitalization Strategy Area (NRSA) located in the Englewood Neighborhood.

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

In general, some federal grant funded activities such as public services, economic development, and housing rehabilitation and new construction are provided on a Citywide basis to low- and moderate-income (LMI) individuals and households. As well, the City of Toledo (COT) has identified and mapped areas of the city where the LMI population is 51% or more. LMI census tracts are: 8, 9, 10, 11, 12.02, 13.02, 14, 15, 17, 18, 19, 20, 22, 23, 24.01, 24.02, 25, 26, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51, 52, 53, 54, 57.01, 59.02, 66, 67, 68, 73.02, 73.03, and 103.

In addition to citywide activities, the COT also uses geographic, place-based strategies to reach the goals in the Five-Year Consolidated plan.

The COT is designating two areas to focus its CDBG and other leverage public and private sector funding to take advantage of the Neighborhood Revitalization Strategy Area (NRSA) tool under the CDBG regulations at 24 CFR 91.215(g). The two areas selected both have neighborhood master plans that were updated and/or completed recently.

The NRSA's strategy was developed through a comprehensive approach and in consultation with a wide array of stakeholders that started with the City's PY 2020-2024 Consolidated Plan process in October 2019. The onset of COVID-19 pandemic, ultimately shut down services, closed businesses, and social distancing extended the planning process. Virtual meetings were used for public meetings and as a result, participation increased. Additionally, the Department of Housing and Community Development consulted with the HUD field office regarding the NRSA as required in the CPD Notice 16-16. As a result of the consultations and HUD NRSA eligibility criteria, the Old South End and Englewood areas were selected as the proposed NRSA's. The NRSA draft plan will be available for public view and comment prior to submission to HUD for final approval.

The proposed geographic areas are as follows: (1) Old South End - located on the south side of the City, NRSA1 is bounded by the Anthony Wayne Trail to the north, Kuhlman Street to the East, Bartley Place to the west, and Lotus Street/Maumee River to the south side and (2) Englewood Neighborhood - located west of the downtown area, NRSA2 is bounded by West Snead Avenue to the west, I-75 to the north, Monroe/Collingwood to the east and Dorr Street to the south.

Geographic Distribution

Target Area	Percentage of Funds
Junction/Englewood	9
Old South End	1
Garfield /Starr/ Raymer	1
Citywide	86
Low to Moderate Income & Slum and Blight	3

Table 1 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

National economic conditions continue to affect the revitalization and stabilization of Toledo neighborhoods. Investment will be prioritized to benefit low- and moderate-income individuals, including minorities, seniors, and persons with disabilities. Issues such as an older housing stock, an increase in vacant and deteriorated properties that contribute to blight and lack of economic development opportunities are negatively impacting once thriving neighborhoods.

Many of the City's neighborhoods have experienced significant decline and disinvestment with older housing stock, slum and blighted conditions, vacant properties and high-cost burden for renters and homeowners. As a result, the federal grants received by the City is not enough to meet the needs of the City's neighborhoods. A NRSA strategy is proven to be a tool for greater impact when using the CDBG dollars in many entitlement jurisdictions.

The City, in adherence to HUD regulations, will allocate at least 70% of its 2020-2024 CDBG entitlement award to programs and activities that directly benefit low- to moderate-income individuals.

Discussion

All projects and activities are designed to meet HUD's National Objective of meeting the needs of low- to moderate-income household, individuals and areas.

5. PROPOSED APPLICATION

Final Application

The Draft Application is available for the public to view.

6. CERTIFICATIONS

Refer to Appendix C: Certifications



CITY OF TOLEDO, OH
Neighborhood
Revitalization Strategy
Area (NRSA)

August 2022

Department of Housing and
Community Development
City of Toledo, OH



DRAFT

TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY.....	1
II.	INTRODUCTION.....	3
III.	NRSA APPROVAL REQUEST AND BOUNDARIES.....	3
IV.	NRSA REQUIREMENTS.....	6
V.	DEMOGRAPHIC AND PRIMARILY RESIDENTIAL CRITERIA.....	6
	Demographic Criteria.....	6
	Primarily Residential.....	6
VI.	BENEFITS OF A HUD APPROVED NRSA	7
VII.	DEMOGRAPHICS AND ECONOMICS – NRSAS.....	7
	Demographics	7
	Population	8
	Population by Race	8
	Population by Ethnicity	10
	Population by Age	10
	Households	11
	Low-and-moderate Income households	11
	Median household Income	12
	Economics	14
	Labor Participation and Unemployment	14
	Toledo Occupations and Wages	15
	Local Business Composition	17
VIII.	COMMUNITY CONSULTATION	18
IX.	ASSESSMENT OF ECONOMIC AND NEIGHBORHOOD CHARACTERISTICS	21
	Housing Conditions.....	21
	Total Housing Units	21
	Housing Tenure	22
	Residential Structures – year Built	22
	Vacancy	23
	Building Activity	24
	Median Home Value	26
	median Gross Rent	27
	Quality of Life.....	28
	Education	28
	crime rate	28
	vacant land	29
	access to transportation	29
X.	HOUSING AND ECONOMIC OPPORTUNITIES/EMPOWERMENT STRATEGY	32
	Empowerment Strategy	32

XI.	2022-2026 PERFORMANCE MANAGEMENT BENCHMARKS	37
XII.	NRSA COORDINATION STRATEGY.....	44
XIII.	MONITORING AND REPORTING	45
XIV.	STRATEGIC PARTNERSHIPS	47
XV.	CURRENT LEVERAGED RESOURCES IN NRSAS.....	52
XVI.	APPENDICES.....	58
	Attachment A: NRSA #1 – Old South End Boundary Map	59
	Attachment B: Old South End Master Plan	60
	Attachment C: NRSA #2 – Englewood Boundary Map	61
	Attachment E: NRSA Demographic and Primarily Residential Criteria	63
	Attachment F: NRSA Public Notices and Public Comments	65
	Attachment G: Current Community Investment by NRSA	66
	Attachment H: Documenting Impact	67
	Attachment I: NRSA Management Structure Organizational Chart.....	71

I. Executive Summary

The City of Toledo's (COT) amendment to its 2020-2024 Consolidated Plan for the use of federal housing funds includes strategies to create two Neighborhood Revitalization Strategy Areas (NRSAs); the Old South End and the Englewood neighborhoods. The first proposed NRSA, Old South End, is located on the south side of the City in an area bounded by the Anthony Wayne Trail, the Maumee River, and an Interstate. Broadway, a major urban thoroughfare, bisects the neighborhood and is lined with commercial, institutional, and residential land uses. The Old South End has a neighborhood master plan which was prepared in 2017 for the Broadway Corridor Coalition in conjunction with the Toledo Design Center. The master plan was recently updated. Englewood, the second area, is located west of the downtown area and bounded by West Snead Avenue to the west, I-75 to the north, Monroe/Collinwood to the east and Dorr Street to the south. The Englewood area has recently completed a neighborhood master plan. Both neighborhood plans are attached as exhibits.

The reason for the NRSA approach is to focus the COT's federal Community Development Block Grant (CDBG) funds, deploy them in a more flexible fashion than would otherwise be possible, and leverage them for greater impact. Job creation would be more easily achieved and public service funding and housing activities would be free of some of the federal restrictions that accompany the CDBG program. The CDBG national objective of principally benefitting low- and moderate-income persons will still be met. On [REDACTED] 2022, the COT City Council approved the NRSA Plan, for submission to the U.S. Department of Housing and Urban Development (HUD) field office for HUD approval.

Maps of the two NRSAs, details of the proposed NRSA planned activities, and NRSA demographics are contained in the Plan that follows. As required in the HUD NRSA rule Notice CPD-16-16, the City's Department of Housing and Community Development (DHCD) conducted a robust community participation process. Community input was received through public meetings, surveys, focus groups, and included residents, businesses, non-profits, institutional partners, private sector, and governmental entities. The draft plan was also issued for a 15-day public comment period through paper copies available at City Hall and the public library, an electronic pdf copy posted on the City's website, and a public notice in a newspaper of general circulation. DHCD staff also consulted with the HUD field office staff in preparing the NRSA application as required by the NRSA rule. The NRSAs were selected from a list of 10 target neighborhoods and narrowed down to the two areas. The selection criteria used was the NRSA low-income and primarily residential criteria, availability of a neighborhood plan or ongoing community planning activities, levels of existing and planned investments, partners already working in the neighborhoods, and the availability of stakeholders to help implement the NRSA plan. Below is a summary of the goals and benchmarks the City plans to provide in the Old South End and Englewood NRSAs.

GOAL 1: Affordable Housing. Benchmarks: Build 173 affordable housing units (new units -148, and acquisition/rehab units-25) and repair 373 owner-occupied single-family houses (general repairs -180 units, roof repairs -150 units, and lead paint/weatherization – 43 units). Convert 55 low-income housing tax credit S/F rentals into homeowner units. The goal is to increase the supply of affordable housing and improve the affordable housing stock for residents.

GOAL 2: Economic and Human Capital Development: *Benchmarks:* Create/retain 40 jobs and assist 20 small businesses/microenterprises. Support Broadway Business District through funding for minority, women, & disadvantaged businesses (M/W/DBE). Create 10 new business spaces. Increase workforce development services to 135 persons in the two NRSAs.

GOAL 3: Neighborhood Improvements and Capacity Building. *Benchmarks:* Improve infrastructure in commercial corridor. Increase in public services through possible two (2) community-based development organizations (CBDOs) to support the NRSA strategies. Demolition of 113 unsafe structures and start a code enforcement compliance funding pilot. Start a Neighborhood Capacity Building Institute for non-profit agencies and train 10 leaders of social service organizations from the NRSAs. Develop a working group coordinated by DHCD staff to assist with implementation in each NRSA.

It is anticipated that the two NRSAs will attract private sector and other non-federal public sector investments and have the following impacts on the housing, economic development, and living environment of the two areas:

- An expanded economic base through improved business districts, the attraction of employers, workforce development, and job creation and retention.
- Improved neighborhood conditions through demolition, proactive code enforcement, and redevelopment of dilapidated properties.
- Increased neighborhood capacity through funding public services and implementation of a neighborhood leadership development program.
- Creation and preservation of affordable housing for a wider range of incomes and reduce the concentration of poverty.
- Facilitate housing for special needs population including the elderly who wish to remain in their homes in the neighborhood and manage gentrification.
- Improve and foster greater partnerships between residents, non-profits, financial institutions, and organizational stakeholders and investors.

The NRSA plan in the two areas will be implemented by an NRSA Redevelopment Coordinator from the DHCD to develop, coordinate, and manage an implementation working group in each of the NRSAs. Each working group will meet monthly and will consist of subcommittees to work on Housing, Economic Development, Neighborhood Improvements, and Public Services. The working groups will consist of residents, community leaders, representatives of non-profits, funders, major institutions, and other stakeholders.

The DHCD will institute a monitoring and reporting system that will provide orientation and training to CDBG subrecipients carrying out NRSA activities, monitor their performance, and ensure compliance. The NRSA Coordinator will provide citizens with ongoing opportunities for public input through at least an annual public meeting to report on the NRSA progress. NRSA accomplishments including the amount of other funding leveraged will be reported in the City's Consolidated Annual Performance Evaluation Report (CAPER).

II. Introduction

The City of Toledo, OH is an “entitlement” recipient of formula grant funds from the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG). To receive these grant funds, the City must prepare a Consolidated Plan every five years to assess the City’s housing and community development needs; analyze the City’s housing market; establish housing and community development priorities, goals, and strategies to address the identified needs; identify the resources to address them; and to stipulate how funds will be allocated to housing and community development activities. The Consolidated Plan must be updated annually, via the preparation of an Annual Action Plan for the use of the formula grant funds received from HUD. The City anticipates receiving \$51.6m in total grants over the five-year period between FY 2022-FY 2026.

The City’s five-year priority needs and goals based on data analysis and community and stakeholder participation were to: 1) expand housing affordability and local development capacity; 2) provide funding to prevent homelessness and provide adequate transitional and permanent housing for special populations; 3) maintain safe and affordable rental housing, especially for the elderly; 4) facilitate healthy and attractive neighborhoods through code enforcement, re-use of vacant lots and crime reduction; 5) improve the quantity and/or quality of public facilities; 6) increase public services, especially for youth and seniors; 7) expand economic opportunities through job creation, access to employment, and small business/microenterprise assistance, and 8) improve public infrastructure.

Many of the City’s neighborhoods have experienced significant decline and disinvestment with older housing stock, slum and blighted conditions, vacant properties, and high-cost burden for both renters and homeowners. Due to high construction costs, availability of land, and incomes not keeping pace with rent and home prices, affordable housing is limited. The federal grants received by the City are not enough to meet the needs of the City neighborhoods.

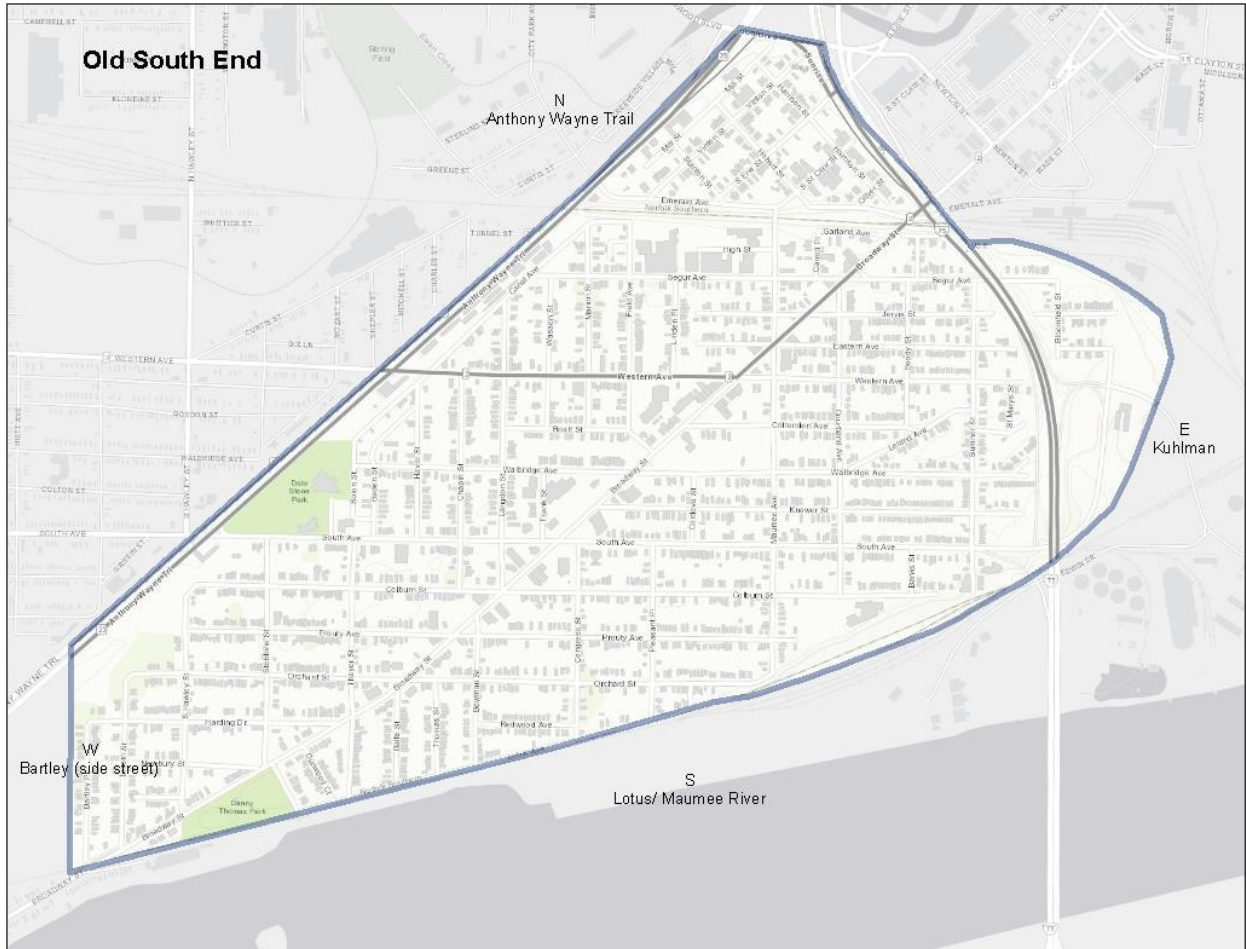
One of the tools available under the CDBG program to focus the scarce federal resources and attract and leverage other public and private sector funding is the designation of a geographic area as a Neighborhood Revitalization Strategy Area (NRSA) per 24 CFR 91.215(g) and 24 CFR 570 Subpart C.

III. NRSA Approval Request and Boundaries

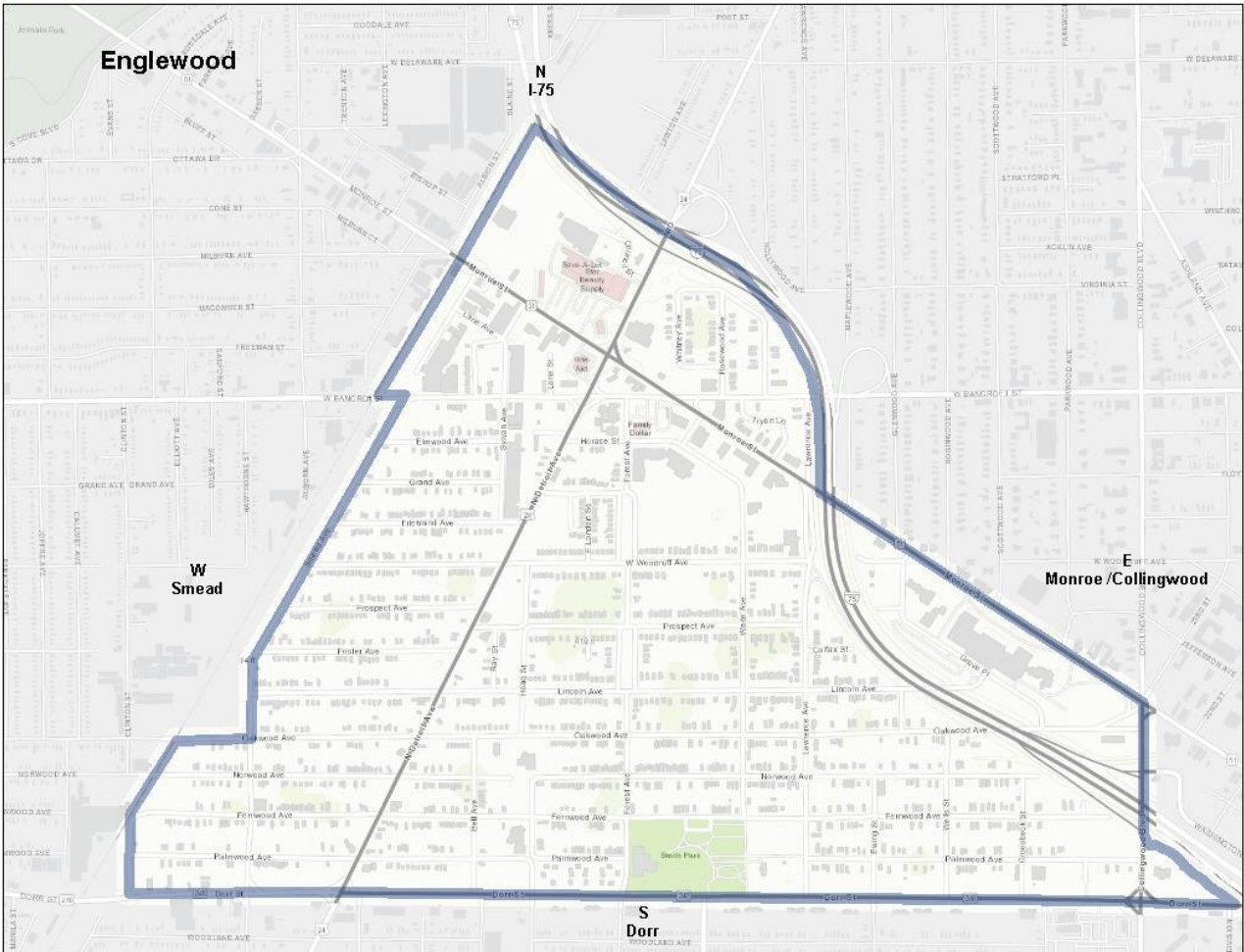
The City of Toledo hereby requests approval of two geographic areas of the City as designated NRSAs over a five-year period with the following boundaries:

- NRSA 1 - Old South End – Located on the south side of the City, NRSA1 is bounded by Anthony Wayne Trail to the north, Kuhlman Street to the East, Bartley Place to the west, and Lotus Street/Maumee River to the south side. See map #1.
- NRSA 2 – Englewood – Located west of the downtown area, NRSA 2 is bounded by West Snead Avenue to the west, I-75 to the north, Monroe/Collingwood to the east, and Dorr Street to the south. See map #2.

OLD SOUTH END MAP #1



ENGLEWOOD MAP #2



IV. NRSA Requirements

According to HUD guidance contained in the Community Planning and Development Notice CPD-16-16, a Neighborhood Revitalization Strategy Area (NRSA) designation must meet the criteria below to receive HUD's approval. The City of Toledo's proposed two NRSAs meet all the required criteria.

- Identified neighborhood boundaries of the NRSAs must be contiguous.
- Identified neighborhoods must be primarily residential and have a low/mod percent equal to the "upper quartile percentage" or 70% for Toledo.
- Selection of areas must be based on documented input from area's stakeholders, including residents, business operators, financial institutions, nonprofits, and community groups. Documentation must include a description of outreach methods and a description of how the needs and concerns of stakeholders (especially residents) were incorporated into the plan.
- Selection of the NRSAs must be based on an assessment of economic conditions, opportunities for economic development and anticipated barriers and challenges.
- The implementation plan must promote the area's economic progress with a focus on activities that will create economic opportunities for low- to moderate-income residents of the NRSAs.
- The NRSA Plan must identify achievable benchmarks over the period of the designation; and
- The NRSA Plan must be submitted as part of the Consolidated Plan. The subject NRSA request is submitted as an amendment to the City's prior approved FY 2020-2024 Consolidated Plan.

V. Demographic and Primarily Residential Criteria

Demographic Criteria

An NRSA must have a percentage of low- and moderate-income (LMI) residents that is equal to the community's "highest quartile percentage" as computed by HUD per 24 CFR 570.208(a)(1)(ii) or 70 percent, whichever is less, but not less than 51 percent. The City's highest quartile percentage is over 70% LMI; so, 70% LMI was used to determine the LMI eligibility. Calculating the total LMI population within the NRSA boundary using the Census tracts and block group tables, the NRSA is eligible if the number of residents who qualify as LMI is at or above 70%. If the boundary cuts across a block group, the data from any block group the boundary touches is included in the LMI calculation. See Attachment I for census block groups and calculations.

Primarily Residential

The CPD Notice states that the designated area must be documented as *primarily residential* but does not define a standard percentage. The City used the HUD Guide to National Objectives & Eligible Activities for Entitlement Communities, Appendix E, page -11 through 3-13 (particularly the "Tips" on page 3-12) to guide on what is *primarily residential*. Also, Chapter 3 – Basically CDBG Handbook, page 3-6 notes that for an LMI service area, "*the activity must be primarily residential, and the activity must meet the identified needs of LMI persons. – An activity with a service area that is not primarily residential may not qualify under the LMI area benefit category even if the activity provides benefits to all residents in the service area and 51 percent of the residents are LMI persons.*"

To arrive at the primarily residential criteria, the City determined the percentage of land area classified as residential as a proportion of the total land area in the NRSA. Commercial, recreational, and industrial uses were included in the total area. The City used 60% or more of residential land as its definition of “primarily residential.” Vacant land zoned as residential may be included in the “primarily residential” calculation if there is a specific plan or actual projects in the pipeline for redevelopment of the land into housing.

One of the main uses of the NRSA is the benefit to individual beneficiaries (single-family homeowners, LMI limited clientele for public services, and LMI employees who qualify for jobs created) rather than an area benefit. The City wishes to balance the housing and economic development opportunities within the NRSAs by including job creation and business assistance activities such as commercial corridors that benefit LMI residents. An example might be projects that benefit elderly or senior citizens (“presumed” LMI under CDBG) such as a Senior Day Care facility located in a business district due to demand for the service and the convenience of a location close to public transit. Another example might be a small business incubator that would most naturally be in a business district.

VI. Benefits of a HUD Approved NRSA

Amendments to the Community Development Block Grant (CDBG) regulations at 24 CFR 570, which were published in the Federal Register on January 5, 1995, and updated in the final rule changes published in the November 9, 1995, Federal Register, described the NRSA benefits. They include:

1. **Job Creation/Retention as Low/Moderate Income Area Benefit:** Job creation/retention activities undertaken pursuant to the strategy may be qualified as meeting area benefit requirements, thus eliminating the need for a business to track the income of persons that take or are considered for such jobs (24 CFR 570.208(a)(1)(vii) and (d)(5)(i).
2. **Aggregation of Housing Units:** Housing units assisted pursuant to the strategy can be a part of a single structure for purposes of applying the low and moderate-income national objective criteria. This provides a greater flexibility to conduct housing programs that revitalize a neighborhood (24 CFR 570.208(a)(3) and (d)(5)(ii).
3. **Aggregate Public Benefit Standard Exemption:** Economic development activities conducted under the strategy may, at the grantee's option, be exempt from aggregate public benefit standards, thus increasing a grantee's flexibility for program design as well as reducing record-keeping requirements related to the public benefit standard (24 CFR 570.209(b)(2)(v)(L) and (M).
4. **Public Service Cap Exemption:** Public services conducted pursuant to the strategy by a Community Based Development Organization (CBDO) are exempt from the 15% public services cap (24 CFR 570.204(b)(2)(ii).

VII. Demographics and Economics - NRSAs

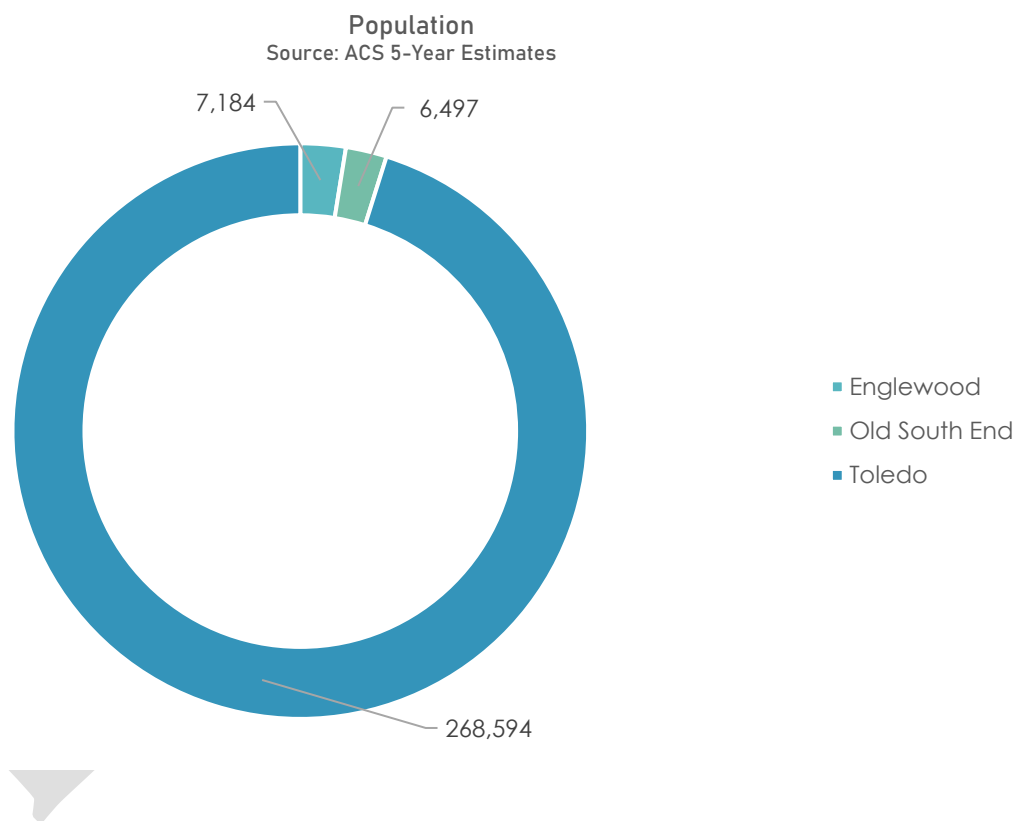
Demographics

The City of Toledo's demographic and economic composition has changed significantly over the last 50 years as the city experienced a decline in traditional manufacturing and production industries. The consequences of these changes have led to many externalities which the City of Toledo is currently trying to address through the NRSA designation of certain neighborhoods. Demographic shifts such as population loss, racial and ethnic composition, and a growing elderly population are explored in this section of the report.

POPULATION

The two designated NRSA's in Toledo contain 4.8 percent of Toledo's population. Figure 1 shows the relative sizes of each designated NRSA area. The larger of the two NRSA's by population is Englewood which has over 7,000 residents, 80 percent of which are Black or African American. The smaller of the two NRSA's, Old South End, consists of just under 6,500 people but has a far more diverse racial and ethnic composition with 20 percent identifying as African American or Black, 58 percent white and just over 28 percent Hispanic or Latino.

Figure 1: Total Population



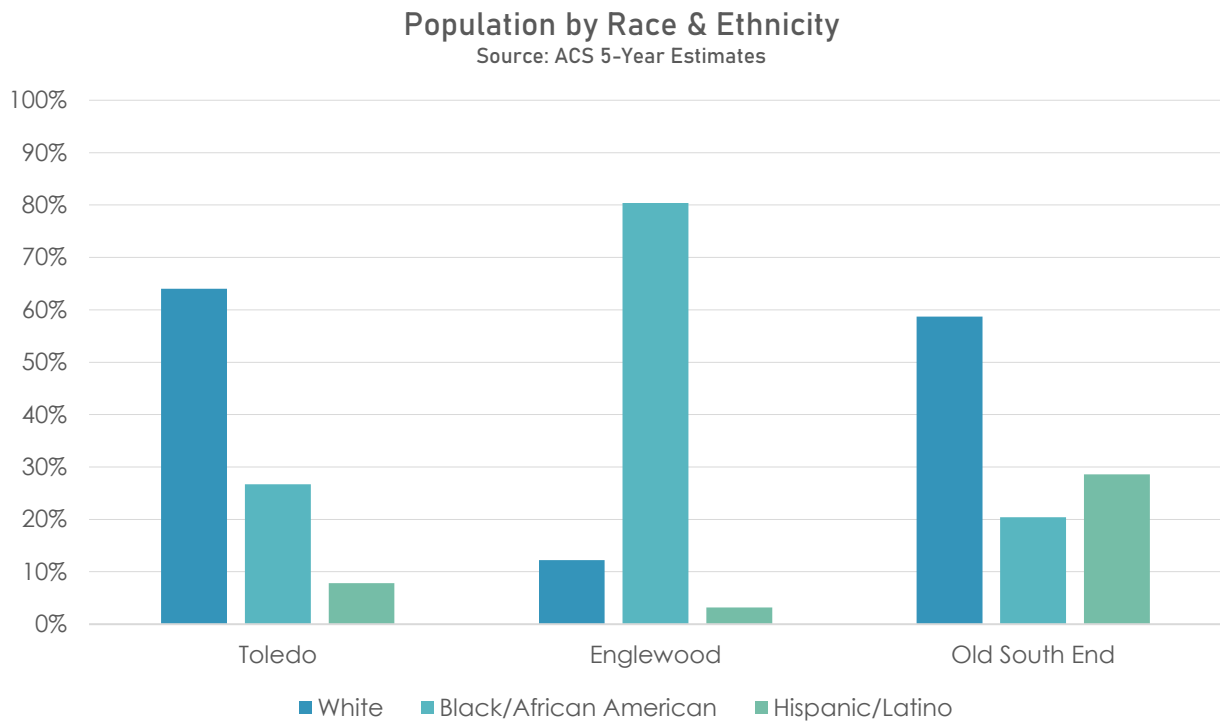
The identified NRSA's have experienced population declines in the past like those found across the rest of the city. The resulting decline in population has led to an increase in vacancy and further disinvestment in the housing stock within each NRSA.

POPULATION BY RACE

Black and African Americans comprise about 26.7 percent of Toledo's population. Based on data provided by HUD and the ACS, census tracts located closer to downtown have the highest proportion

of African American and Black residents, while areas further outside the downtown metro area are White residents. Figure 2 compares the racial composition of each NRSA to the City of Toledo. The area with the least diversity is Englewood, where 80 percent of the population is Black and African American. Conversely, the NRSA with the greatest diversity by population is Old South End which is in the southwest of the city situated between the Toledo Zoo and the Downtown Central Business District. In this area, Black and African Americans are not the predominate racial group, but White and Hispanic or Latino residents make up the majority, representing a combined 87.3 percent of the population.

Figure 2: Population by Race



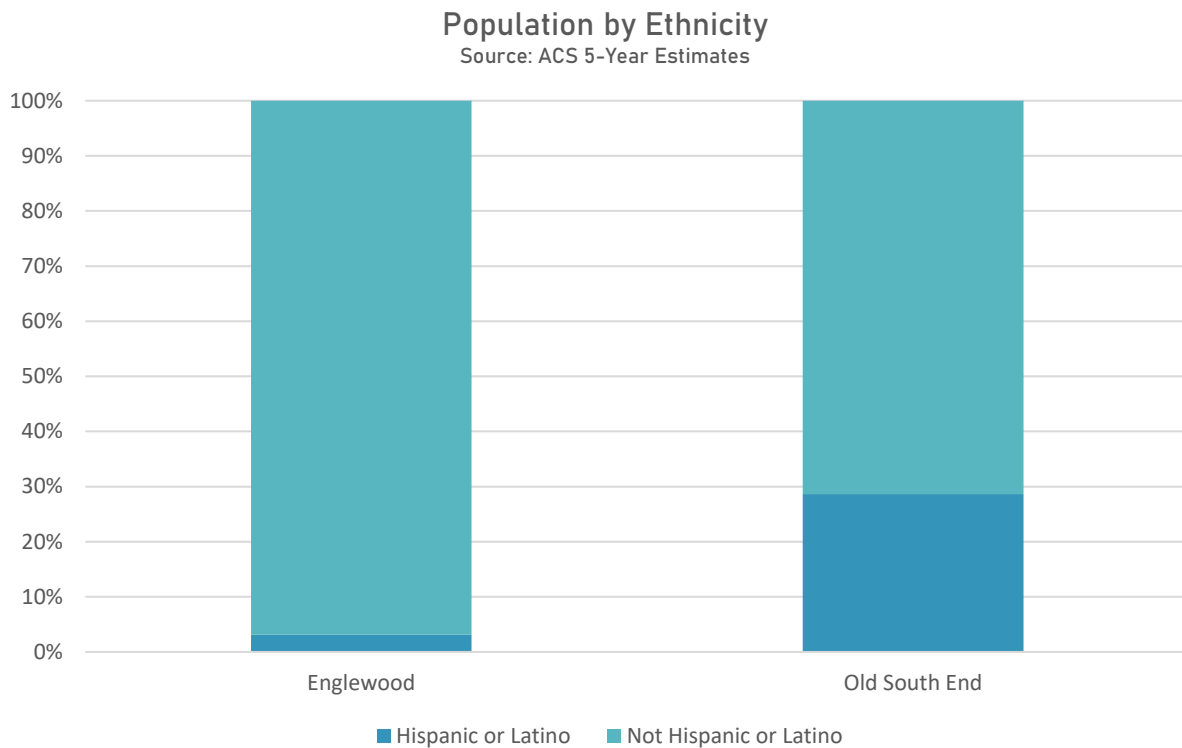
The demographics of Toledo are very striking because there is a stark contrast in racial and ethnic composition across its geography. As previously mentioned, within the City of Toledo, census tracts such as those that fall within Englewood and Old South End are residents of color. Census tracts further away from the Downtown Central Business District are composed of white residents, which in many ways illustrates the geographic legacy of historic redlining practices. Toledo's population has seen a gradual decline, particularly of its White population, which has led to a slow process of increased diversification within the city.

Within the past decade, Toledo has seen a 6 percent drop in its White population and a 9 percent increase in Hispanic or Latino residents. Furthermore, those that identify as two or more races account for an 18% increase in the city's population. This would suggest that people of color will drive population growth in the coming decades.

POPULATION BY ETHNICITY

Across Toledo, the Hispanic or Latino population accounts for 8 percent of the population. As previously mentioned, Old South End includes the census tracts with the largest concentration of Hispanic or Latino residents. Despite the low percentage of Hispanic or Latino residents, they are one of the fastest growth populations within the city.

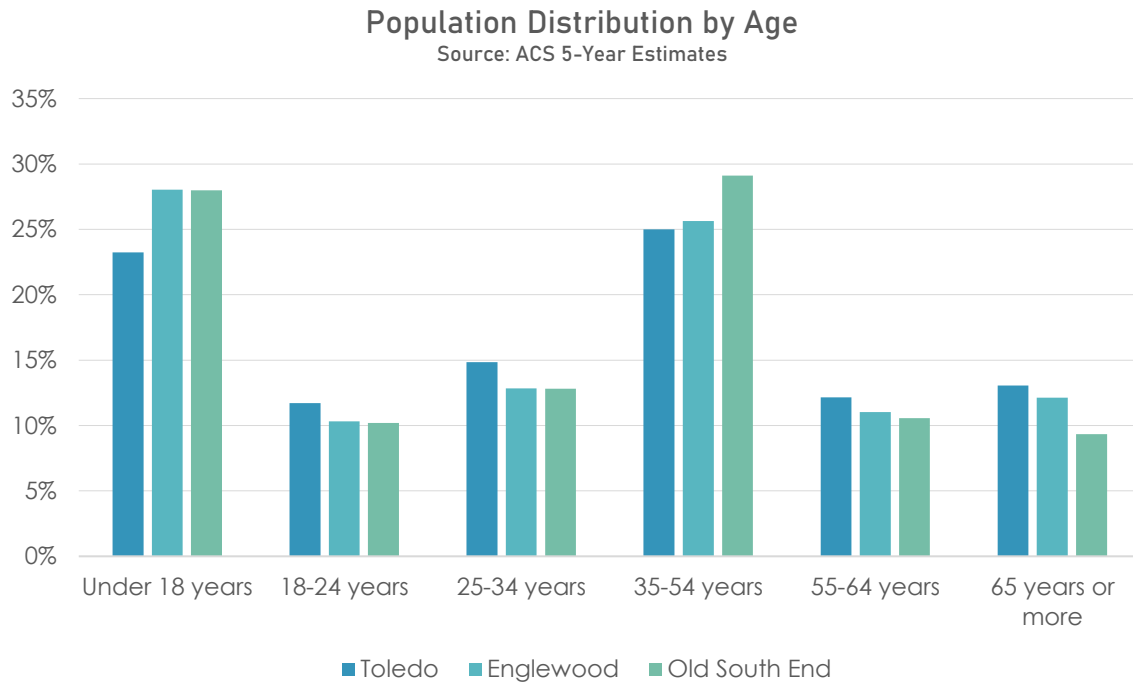
Figure 3: Population by Ethnicity



POPULATION BY AGE

Population by age is one way to look at the demographic makeup of a community and assess potential housing, employment, and service needs. A large youth population could be an asset, as younger workers may have an easier time adapting to a changing economic ecosystem and are often exposed to a range of college education, apprenticeships/internships, and trainings. In Toledo, about 24 percent of the population is under the age of 18. At the other end of the age spectrum, seniors (those older than 65) make up 13 percent of the population and tend to be in the latter part of their working years or into retirement. In Toledo, about 25 percent of the population is between the ages of 35 and 54, which can be considered prime earning years. These individuals tend to establish roots within communities and have school-aged children.

Figure 4: Population by Age



The two NRSA's have similar age distributions of residents between the ages of 18 and 64, although the higher proportions of people under 18 and 35 – 54 suggest that there are higher percentages of families living in the NRSA's compared to citywide percentages. Both NRSA's Englewood and Old South End have high proportions of residents under 18 compared to the City of Toledo. In contrast, both NRSA's have smaller proportions of elderly residents with Old South End having the lowest at 9.3 percent. The highest population by age within the Old South End is 35 – 54 and in Englewood it is under 18.

Households

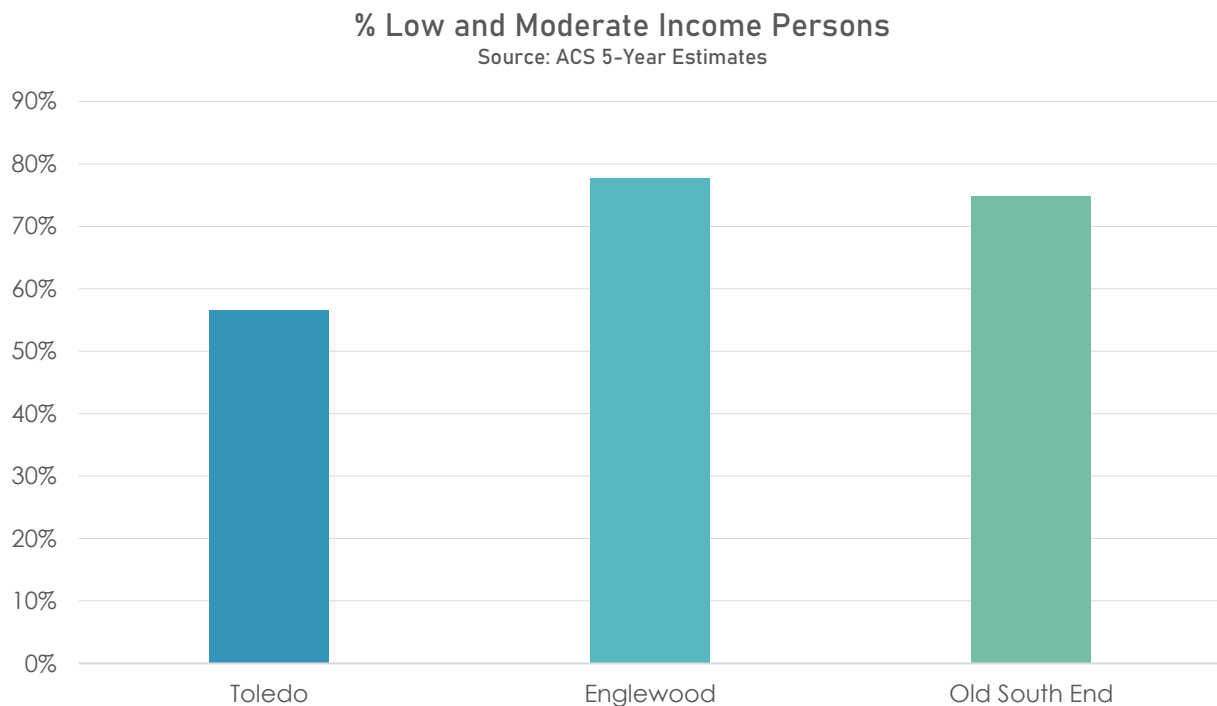
This section examines households in each NRSA from an income perspective. Key data points explored in this section include low-and-moderate households, median household income, and relative income distribution across the NRSAs.

LOW-AND-MODERATE INCOME HOUSEHOLDS

Globalization and the decline of traditional manufacturing impacted the City of Toledo over the last 50 years and have resulted in changes to the City's economy and resultant household income. Over the past decade, the automotive and manufacturing industries have begun to re-emerge as the backbone of the regional economy after numerous changes in technology, supply chains, competition, and consumer preferences. Despite the more recent growth, the larger more long-term impacts of the regional economic contraction have resulted in higher unemployment and out-migration of residents.

These economic conditions have resulted in high numbers of households qualifying as low-or-moderate income (LMI). Moderate-income households have an annualized family income between 50% and 80% of the U.S. Department of Housing and Urban Development (HUD) area median income (AMI), while low-income households have an annualized family income of less than 50% of the HUD area median income.

Figure 5: Low-and-Moderate Income Persons



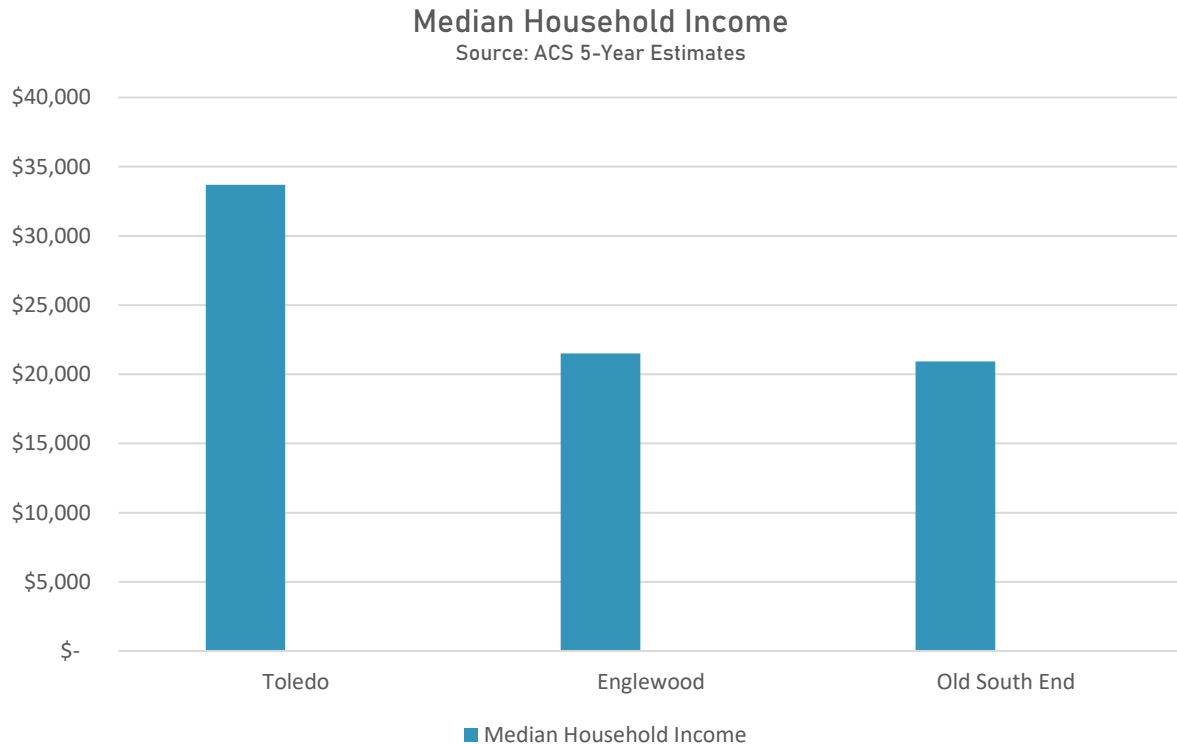
In Toledo, about 57 percent of the population is classified as LMI, illustrating the economic and income challenges residents face. Households which qualify as LMI, may have difficulty finding and securing safe and affordable housing. Additionally, these households have limited disposable incomes for necessities. The two identified NRSA's have LMI populations greater than the city-wide figure of 57 percent, with Englewood LMI population around 78 percent and Old South End at 75 percent. An interesting point of comparison between the Englewood and Old South End NRSA's is their similar rates of LMI population but varied household composition by race and age. Englewood is African American and Black with a large under 18 population and Old South End is a predominately White and Hispanic or Latino population of prime working age (35 – 54).

MEDIAN HOUSEHOLD INCOME

While the city still faces challenges, significant capital investment and economic development projects continue to leverage key industries to strategically position Toledo for attracting new businesses, investment, and talent. These elements are key for building an advanced manufacturing, automotive, and logistics-based economy given the changes in traditional industrial sectors. Even with the changes observed across the city over the last decade, the median household income in Toledo remains low. In 2015, the median household income was \$32,687 which is half the nationwide median. Furthermore,

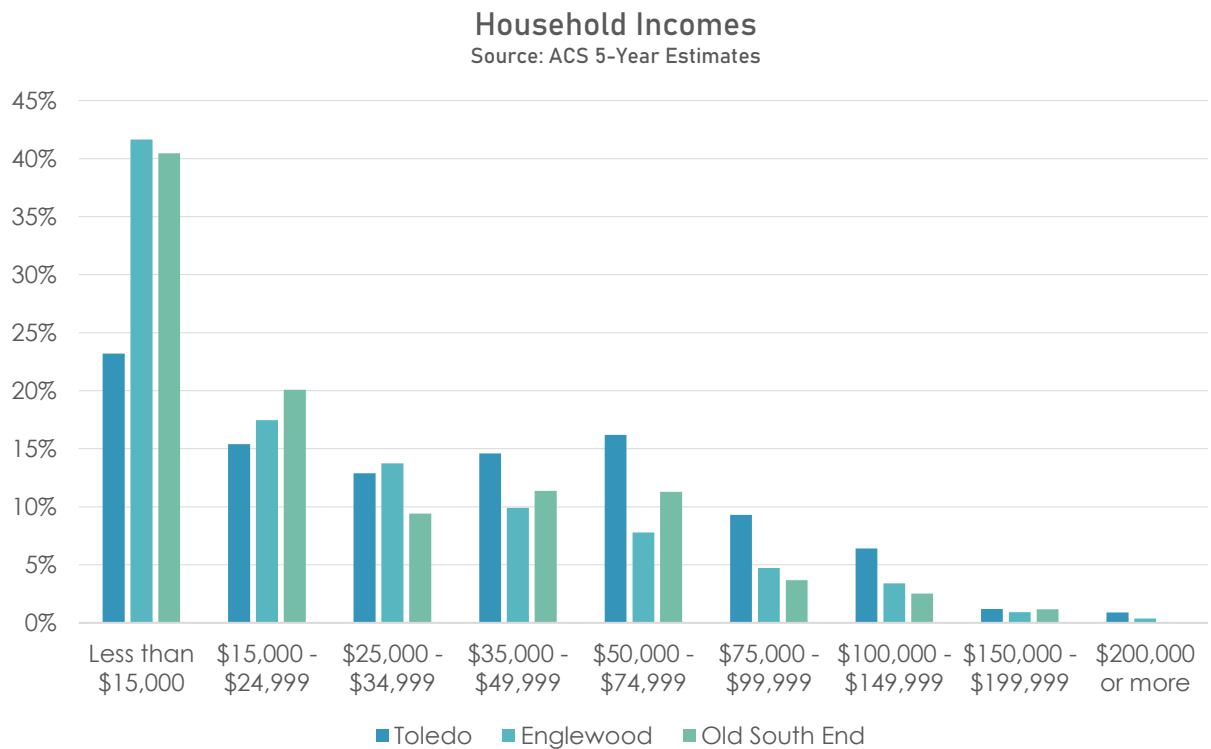
Englewood and Old South End are significantly below the city-wide median, with Englewood's median income at \$21,513 and Old South End marking \$20,938.

Figure 6: Median Household Income



The distribution of household incomes within each NRSA shows the degree to which households may be struggling, particularly those who are currently in housing priced higher than what they may be able to realistically afford. Across the two NRSA's, more than 40% of households are earning less than \$15,000 per year. Between 55 and 60 percent of households are earning at or below the federal poverty line placing tremendous pressure on individuals and families to balance housing costs with other daily needs like healthcare, education, transportation, food security, and more.

Figure 7: Household Income



Economics

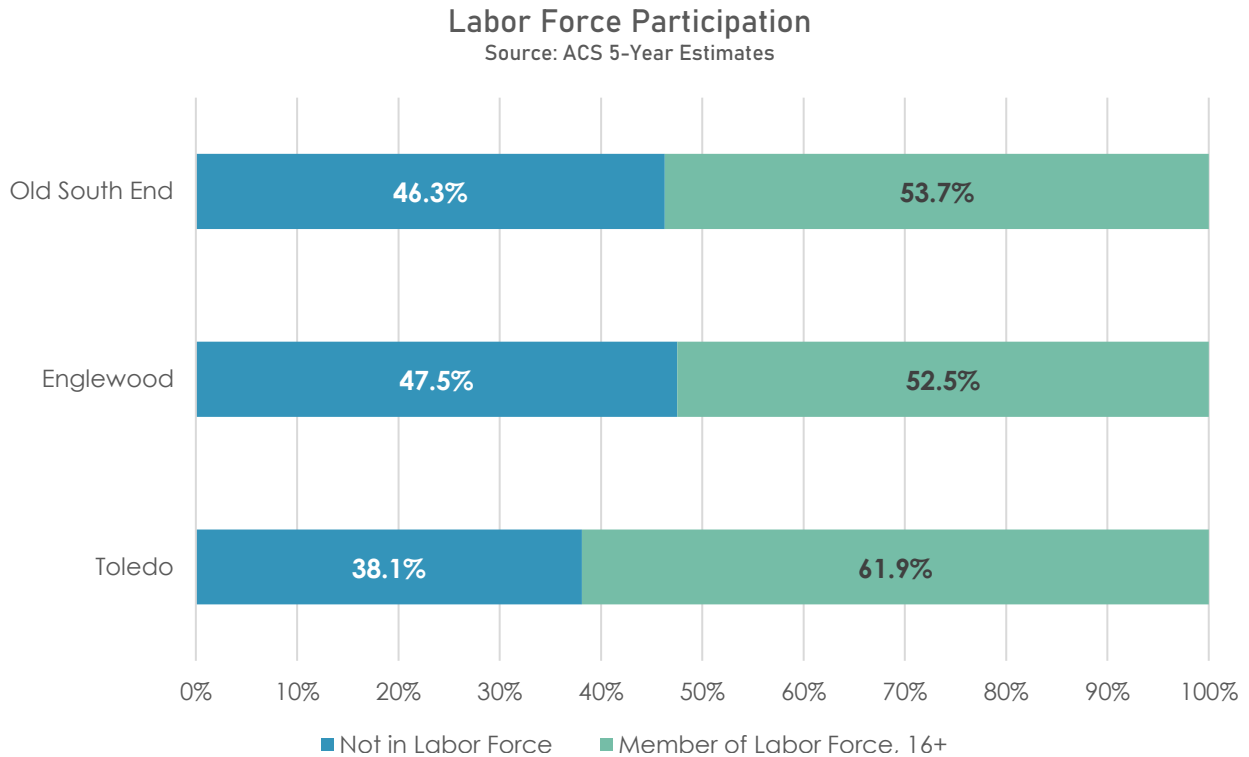
Local economic conditions are an important factor to look at when identifying strategies for NSRAs and how to provide better outcomes for the LMI population. Understanding the existing employment landscape can help in targeting specific policies and programs. This section describes labor participation and employment, occupations, wages, and establishments across each of the selected NRSA.

LABOR PARTICIPATION AND UNEMPLOYMENT

Over the last few decades of the 20th century, the declines in historic manufacturing industries across the city and region have resulted in job loss and declining household incomes for many in Toledo. The periods of economic decline due to industrial restructuring and globalization have resulted in a prolonged trend of population declines and a lower labor participation rate for working-age residents. Across the city, unemployment varies with city census tracts experiencing unemployment rates

ranging from 19 percent and 32 percent. Figure 8 shows the labor force participation rates by NRSA. Comparing the two NRSA's to citywide rates, the proportion of the population not in the labor force

Figure 8: Labor Participation Rate

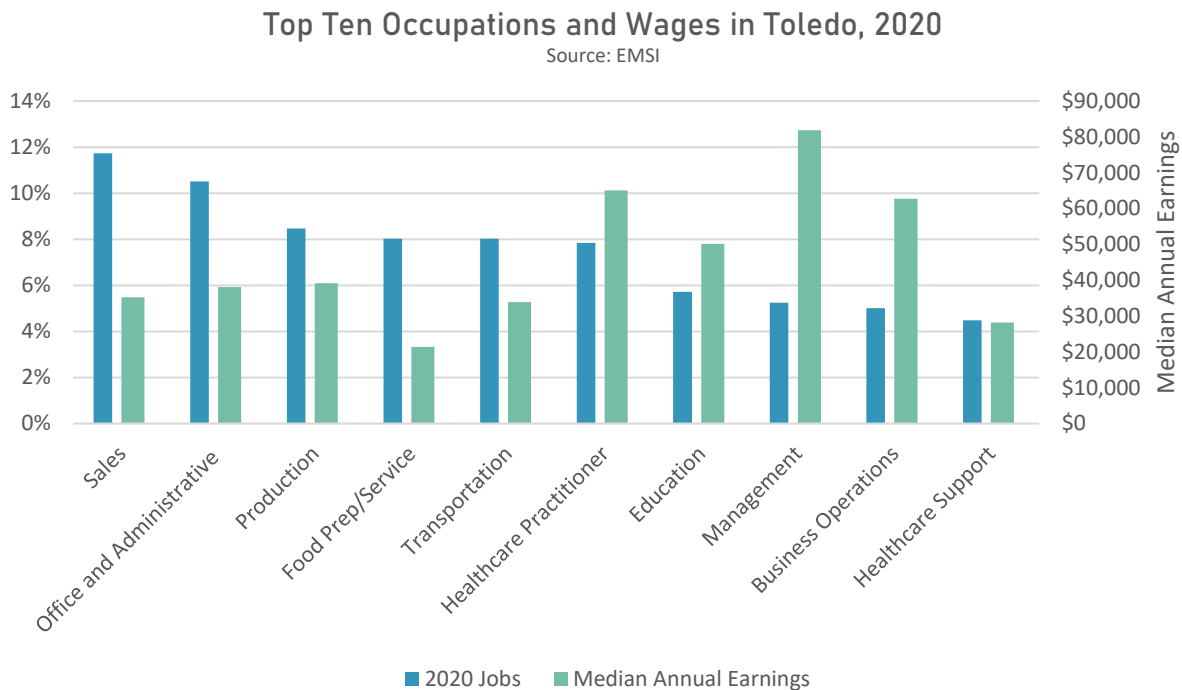


is over 10% higher in Old South End (46.3%) and Englewood (47.5%) than Toledo (38.1%).

TOLEDO OCCUPATIONS AND WAGES

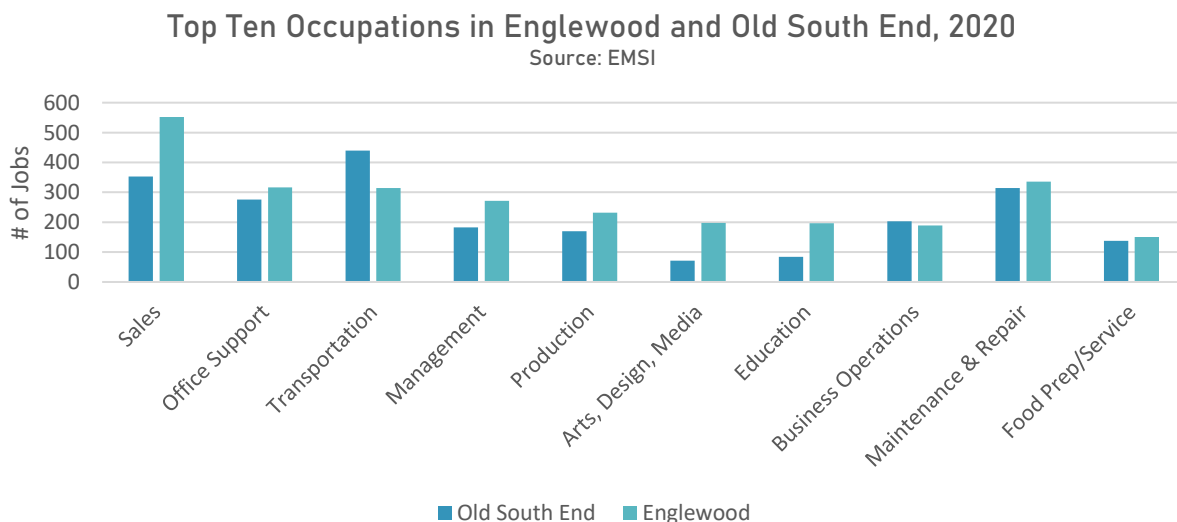
The decline of jobs in several competitive sectors including health care, manufacturing, and professional services over the last few decades has played a major role in Toledo's population decline from a peak of almost 384,000 residents in the 1970's. Today, the city's predominate industries include businesses in health care and social assistance; arts and entertainment; manufacturing, namely automotive industries; and transportation and logistics. From an occupational standpoint, the largest occupations include sales, office and administrative, healthcare support, business operations specialists, food prep and service workers, and education related occupations. Figure 9 presents the top ten occupations and wages for Toledo.

Figure 9: Top Ten Occupations and Wages in Toledo



Many of the top occupations, outside of those requiring advanced degrees, computer, or technical skills, are low wage jobs. The importance of education cannot be understated, as workers with low levels of education will find it more difficult to compete for living wage jobs. Existing industries such as automotive and the re-emerging advanced manufacturing are now requiring workers to have higher levels of education, technical skills, and the ability to adapt to technological change. Investment in human capital is necessary to ensure everyone in Toledo has an opportunity to be gainfully

Figure 10: Top Ten Occupations by NRSA



employed. The city has programs available to help improve individual's capabilities around basic

skills, technical training, and educational credentialing. In comparison to Figure 9, Figure 10 highlights the top ten occupations by employment within the two NRSA's. Like the citywide statistics, most of the working population in Old South End and Englewood fall within the sales, office/administrative and transportation occupations. Occupations in maintenance, repair and installation are also a high employment sector within the NRSA's.

LOCAL BUSINESS COMPOSITION

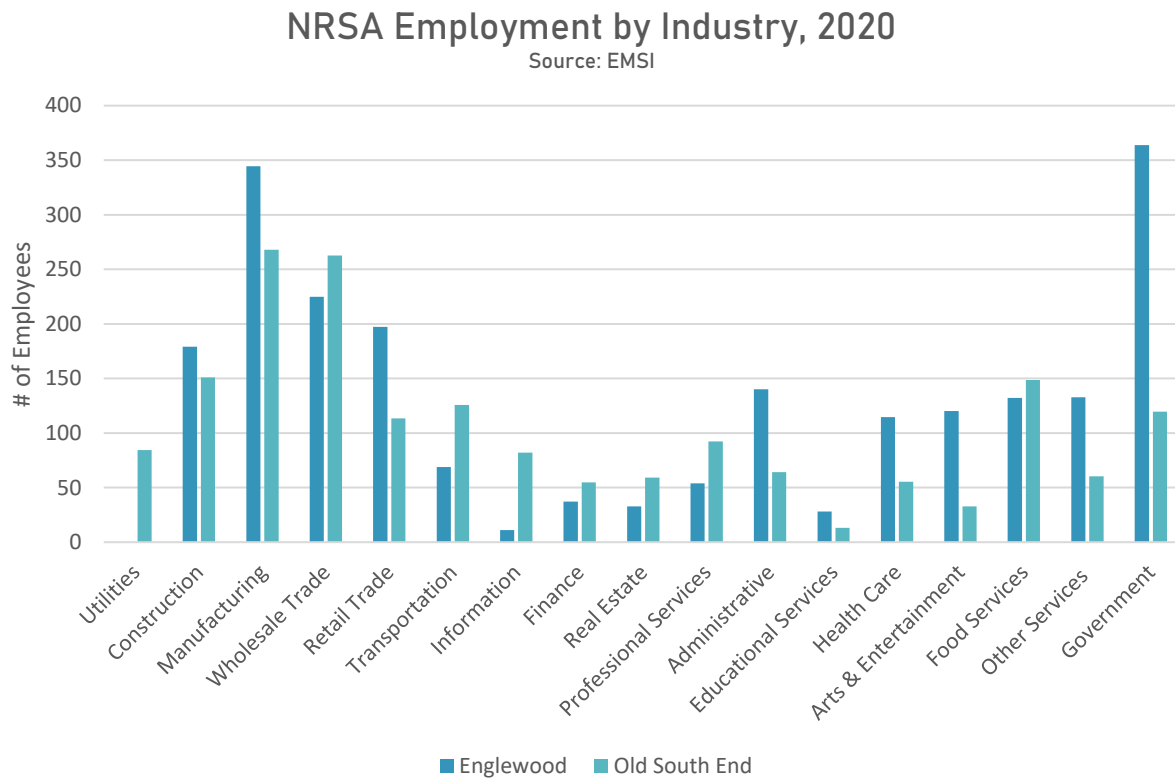
Table 1 presents business listing data for each individual NRSA and in aggregate. Based on the local data, Retail Trade and Other Service firms make up 42 percent of businesses found in the NRSAs. These types of businesses may rely on a workforce which has lower levels of education and technical skills. Additionally, businesses such as these may also have higher turnover, offer lower wages and are at greater risk of opportunity loss in the face of economic shocks such as the COVID-19 pandemic.

Establishments by Industry NAICS	Englewood	Old South End	Combined NRSA
Construction	5	2	7
Manufacturing	6	4	10
Wholesale Trade	2	3	5
Retail Trade	13	25	38
Transportation & Warehousing	1	4	5
Information	3	3	6
Finance & Insurance	2	3	5
Real Estate	3	2	5
Professional Services	3	4	7
Administrative Support	0	1	1
Educational Services	4	2	6
Health Care	5	10	15
Arts & Entertainment	3	0	3
Accommodation & Food Service	3	9	12
Other Services	21	17	38
Public Administration	1	2	3
Unclassified Establishments	6	6	12
Total Establishments	81	97	178
Source: ESRI Business Analyst. 2020			

The employment distribution by industry sector within each NRSA presents an interesting picture of their relative industry advantage. Figure 11 shows that while many industries have similar representation across the NRSA's, the Manufacturing and Wholesale Trade industries represents 26 percent of the jobs found in Englewood and 30 percent in Old South End yet the number of businesses across both sectors totals 15 meaning that these businesses are major employers for the NRSA's. Manufacturing jobs tend to have higher pay and require workers to have technical skills. The data

also shows that Englewood has 17 percent of its local employment clustered in the government sector. On average, these industries tend to pay less than private sector jobs but often require specific credentials and employment requirements. Another industry of note is the retail sector which has a total of 38 businesses across the two NRSA's but only employs a total of 311, suggesting that these businesses are relatively small.

Figure 11: NRSA Employment by Industry



VIII. Community Consultation

Community participation is a critical component of the NRSA development process. Per CPD Notice 16-16, the NRSA strategy was developed in consultation with a wide variety of stakeholders and started with the City's FY 2020-2024 Consolidated Planning process in October 2019. The City took a comprehensive approach and consulted with non-profit organizations, government agencies, housing providers, professional associations, neighborhood groups, the local public housing authority, the Fair Housing Center, and many other regional and local organizations engaged in housing, health, and community and economic development. The onset of the COVID-19 pandemic, the resultant shut down of services, closure of businesses, and social distancing elongated the planning process. Virtual meetings were used for the public meetings and participation increased as a result. Citizen participation will continue as the plan moves into implementation and the management and coordination of the NRSA during the five-year designation period. See Section XII for further details.

Beginning with its FY2020 Consolidated Plan, the concept of the Neighborhood Revitalization Strategy Area (NRSA) was first introduced to residents and other stakeholders. Ten (10) potential areas were identified for consideration based on the following selection criteria:

- The proposed neighborhood/area met the 70% LMI population criteria.
- At least 60% of the geographic area of the proposed NRSA had a primarily residential area.
- The area had a current resident-driven community plan document or started developing one.
- Stakeholders were already working in those communities and opportunities to leverage philanthropic, private sector, and other government investments in the areas.
- The area had at least one commercial corridor.
- Strong community leadership can be capitalized on to drive neighborhood improvements.

A Consolidated Plan (Con Plan) Steering Committee was established to provide input and its members were consulted in developing the NRSA plan. This committee was comprised of representatives of a variety of local and regional stakeholders, including those listed below:

- | | |
|---|--|
| ▪ LISC Toledo | ▪ The Ability Center |
| ▪ Lucas County Land Bank | ▪ 1Matters |
| ▪ Toledo-Lucas County Port Authority | ▪ Toledo Regional Chamber - Small Business Development Center |
| ▪ Toledo Public Schools | ▪ Toledo Fair Housing Center |
| ▪ University of Toledo - Jack Ford Urban Affairs Center | ▪ Mental Health & Recovery Services Board of Lucas County (MHRSLC) |
| ▪ Lucas County Veterans Service Commission | ▪ Assets Toledo |
| ▪ Toledo Lucas County Homelessness Board (TLCHB) | ▪ University of Toledo - Minority Business Assistance Center |
| ▪ First Energy | ▪ City of Toledo Plan Commission |
| ▪ Metro Parks Toledo | ▪ Lucas Metropolitan Housing Authority (LMHA) |
| ▪ Lucas County | |

The Department of Housing and Community Development consulted with the HUD field office regarding the NRSA as required in the CPD Notice 16-16 by way of letters, emails, and meetings. Out of the various consultations and the review criteria, the Old South End and Englewood areas were selected as proposed NRSAs. Broader outreach was done through social media, the City's website, two newspapers of general circulation and two minority community-based newspapers. **See attached newspaper ad and website proof of publication.**

Over 395 residents and stakeholders (i.e., neighborhood associations, district councils, non-profits, businesses, utilities, etc.) attended the meetings and input listed in the table below. The NRSA draft plan was published for a 15-day period from **___/___/2022** to **___/___/2022** with printed copies at City Hall and a pdf copy on the City's website. Public comments received are included in Attachment F.

Public and Stakeholder Input**NRSA Consultation**

Dates	Types of Input	Location	Attendees	NRSA Topics
10/21/2019	Non-Profit Focus Group Meeting	YWCA	43	Intro to NRSA approach & selection criteria
10/22/2019	Public meeting	Zablocki Senior Center (North End)	15	Intro to NRSA approach & selection criteria
10/22/2019	Con Plan Steering Committee I	City hall	25	Intro to NRSA approach & selection criteria
10/23/2019	Public meeting	Believe Center (South End)	20	Intro to NRSA approach & selection criteria
11/22/2019	Con Plan Steering Committee II	Community Center	51	Prioritize NRSA criteria & select first three areas
12/2019	Consultations with City Depts and organizations	City Hall	8	Intro to NRSA areas & current investments
12/13/2019	TTP training session with community stakeholders	United Way	11	Intro to NRSAs, current activities, & criteria
12/18/2019	Toledo United Way Board of Directors meeting	United Way	16	Intro to NRSAs, current activities, & criteria
01/02/2020	Organization stakeholder Con Plan information meeting	United Way	49	NRSA overview, selection criteria, and proposed areas
01/07/2020	Public hearing – FY2020 Consolidated Plan	City Council Chamber	40	NRSA overview, and initial proposed areas
05/2020	2020-2024 Con Plan Briefing to City Council	City Council Chamber	20	NRSA overview, and initial proposed areas
06/4&11/20	Two 2020 Annual Action Plan Public hearings	Virtual platform	20	NRSA overview, and initial proposed areas
6/21/2020	Public meeting – Old South End NRSA	Virtual platform	25	NRSA data review and information meeting
08/24/2021	Public Meeting - Old South End NRSA	Virtual platform	28	Review NRSA goals, objectives, and outputs
08/26/2021	Public Meeting - Englewood NRSA	Virtual platform	18	Review NRSA goals, objectives, and outputs
9/22-27/21	Key person meetings	Virtual platform	6	Discussed NRSA needs & investments
TBD	15-day comment period	Virtual platform	TBD	NRSA draft application
TBD	Public hearing	City Council	TBD	NRSA Plan approval

IX. Assessment of Economic and Neighborhood Characteristics

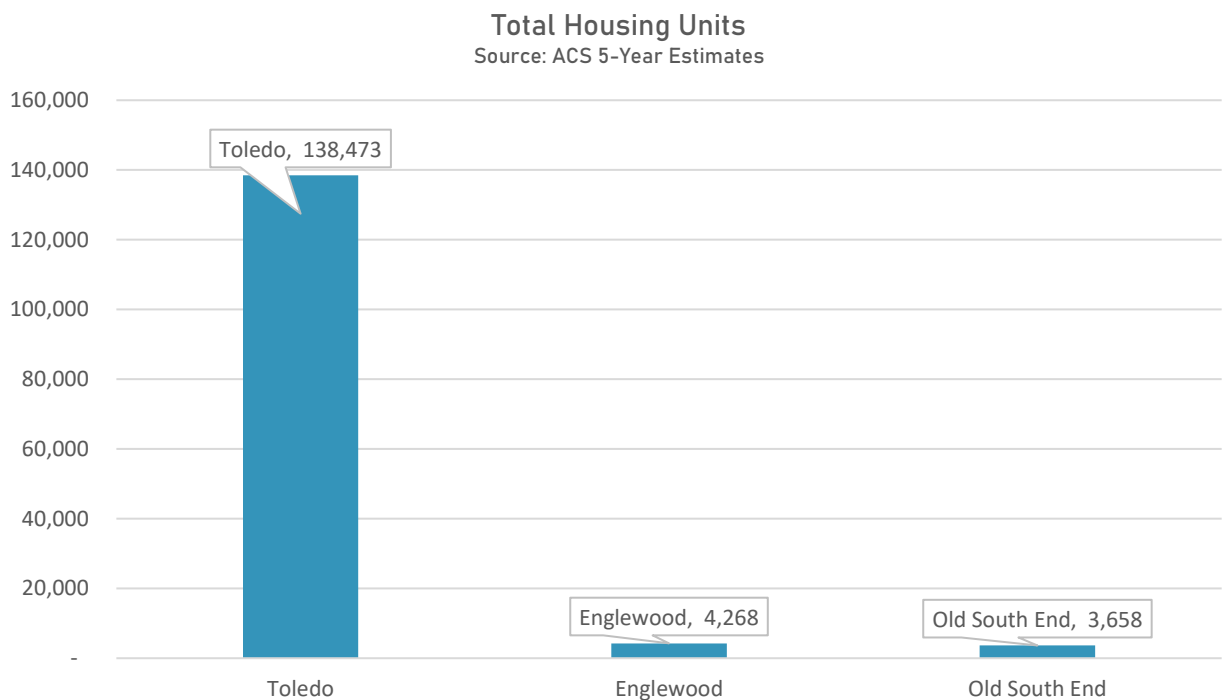
Housing Conditions

The composition and condition of housing are important considerations within an NRSA. Programs and funding can and should be targeted to improve the quality of existing housing, as well as encourage investment in new housing to meet the needs and affordability of residents. This section describes the housing stock, median values, and median gross rents across each of the selected NRSAs.

Total Housing Units

The designated NRSA areas within the City of Toledo account for 5.7 percent of the City's total housing stock. As of 2015, Toledo had a total of 138,473 housing units with 7,926 units located within Englewood and Old South End.

Figure 12: Total Housing Units

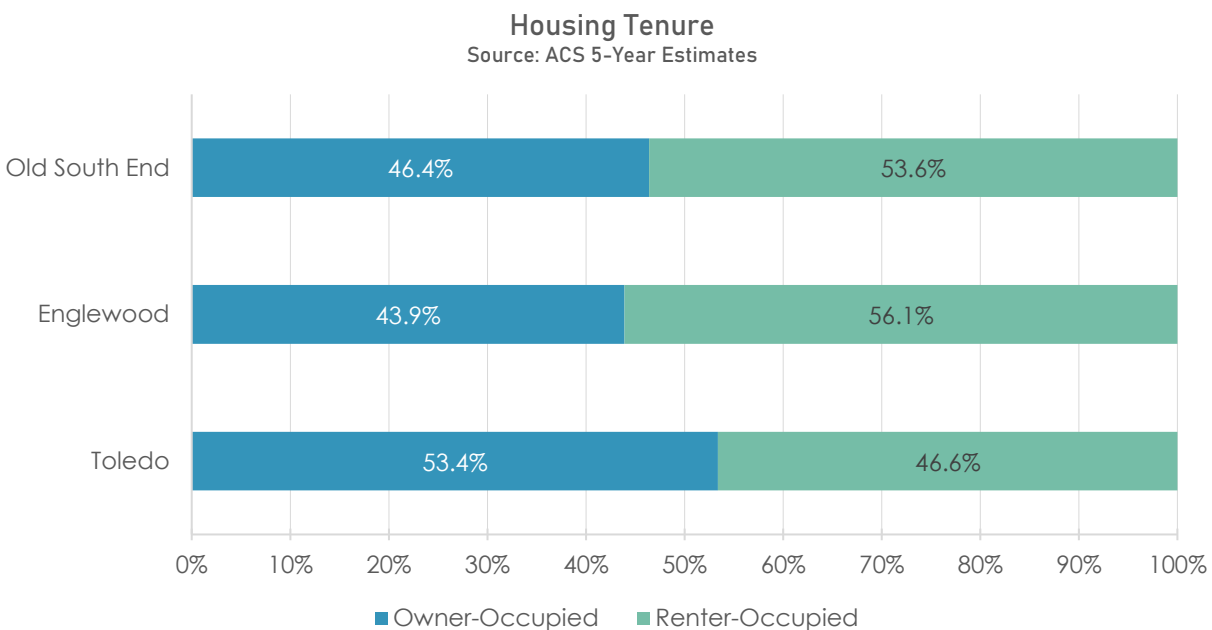


HOUSING TENURE

Within the City of Toledo, approximately 53.4 percent of all residents live in owner-occupied housing units compared to 46.6 percent of residents living in renter-occupied units. The graph below shows how the two NRSA areas compare to the city. In both Englewood and Old South End, the percentage of residents living in renter-occupied housing exceeds that of Toledo's city-wide percentage.

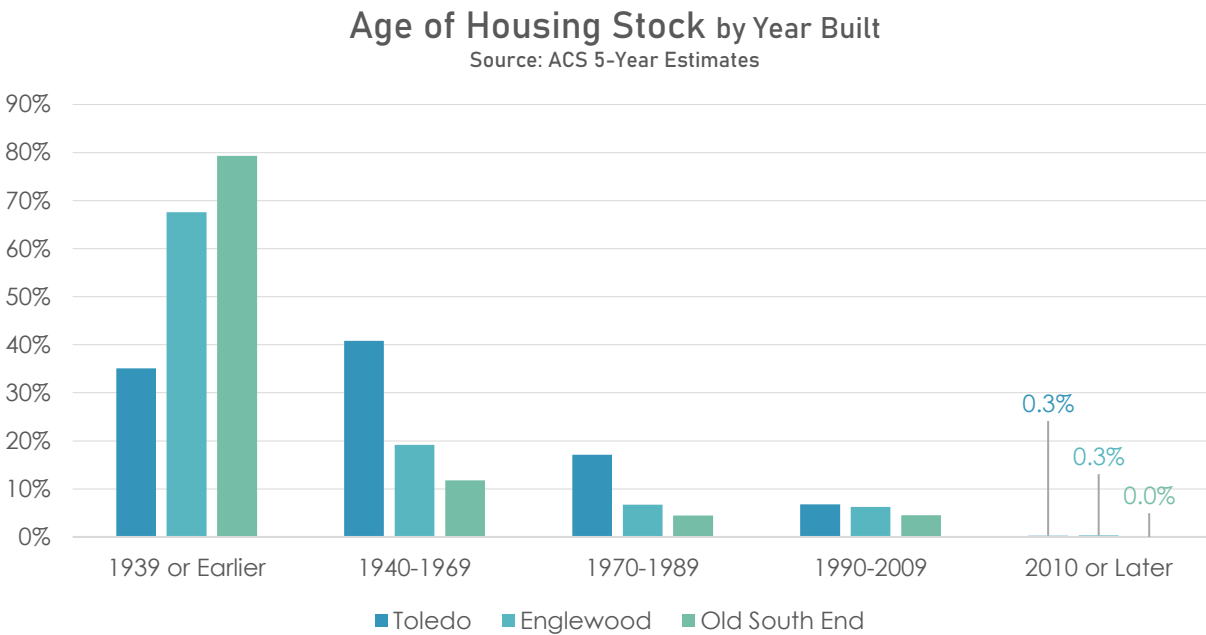
RESIDENTIAL STRUCTURES - YEAR BUILT

Figure 13: Housing Tenure



Toledo's housing stock consists of residential structures built prior to 1970, with 35 percent built in 1939 or earlier, and 40 percent built between 1940 – 1969. Within Englewood and Old South End, most residential structures were built in 1939 or earlier with 79.3 percent in Old South End and 67.6 percent in Englewood. Less than 1 percent of all structures in the city were built after 2010, and within the NRSA's that percentage amounts to 0 in Old South End and 0.3 percent in Englewood. This creates challenges for the city and property owners around on-going maintenance and rehabilitation of residential structures, particularly with the lower household incomes of many Toledo residents.

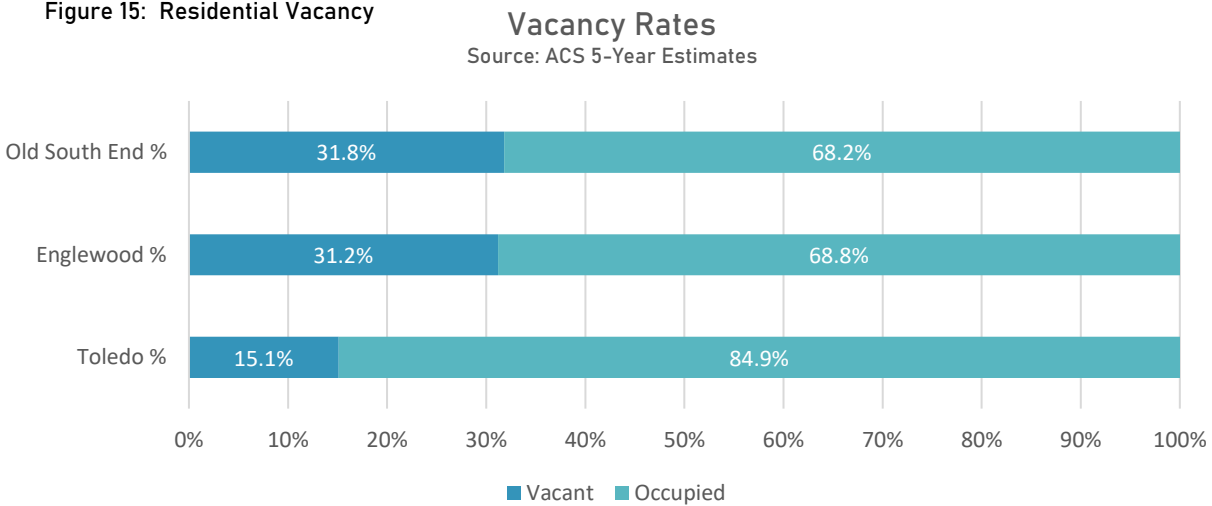
Figure 14: Residential Structures, Year Built



VACANCY

Local housing conditions are a contributor to housing values and an influencer of market forces. There are 20,942 vacant housing units in the city, which accounts for about 15.1 percent of the entire housing stock. From 2010 to 2015 vacancy rates increased by 1 percent (615 units). This growing number of vacant properties also tend to occur in census tracts where predominantly renters live. With such an old housing stock, vacancy rates will increase due to risks of lead exposure and other hazardous conditions. Figure 15 illustrates that across the NRSA's vacancy rates were double that of the city.

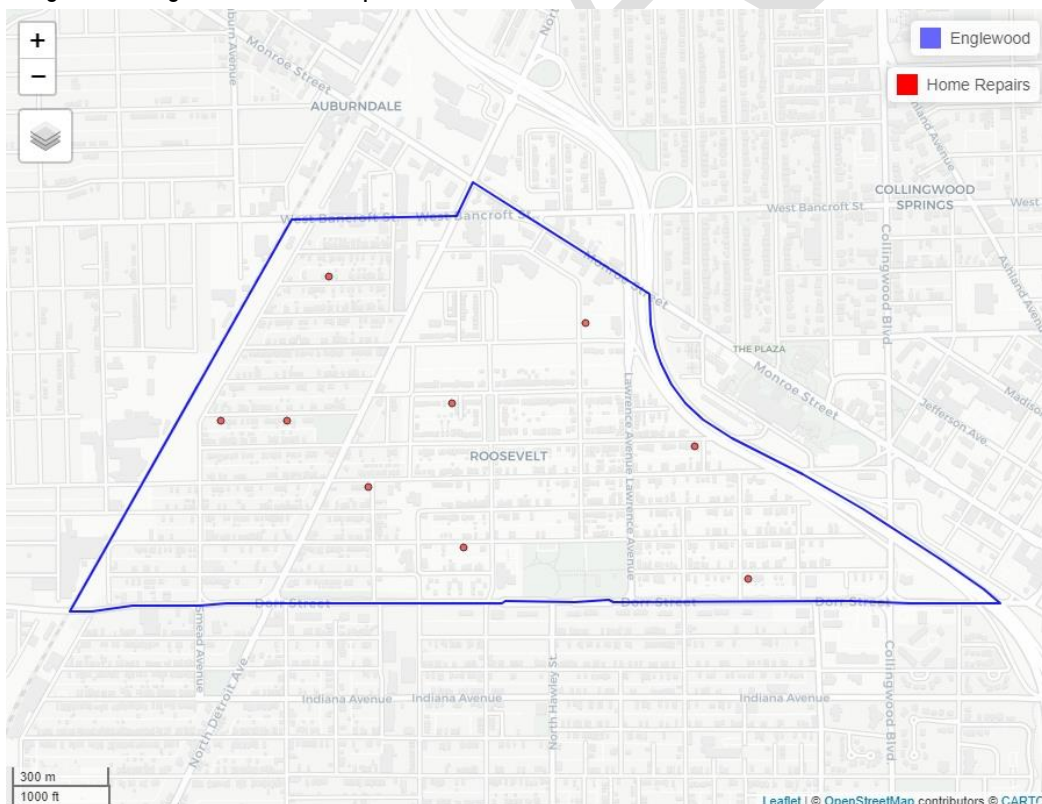
Figure 15: Residential Vacancy



BUILDING ACTIVITY

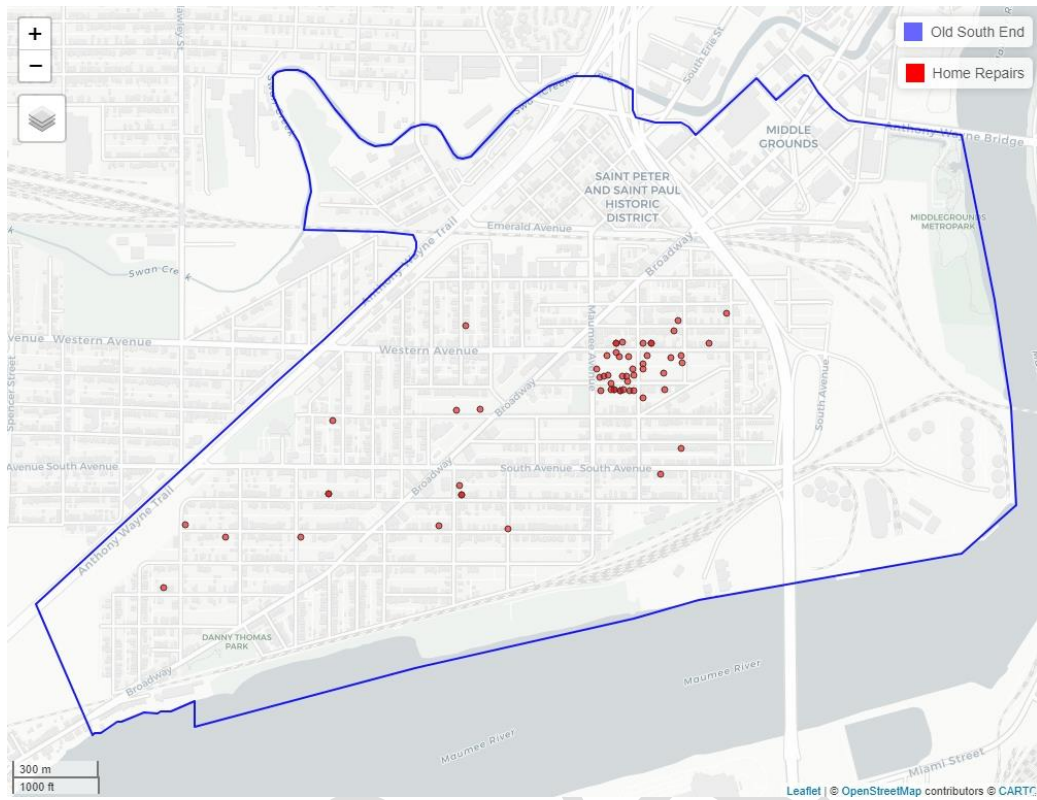
Between January 2018 and June 2021, the City of Toledo and the Land Bank have demolished a total of 419 buildings in and around the Englewood and Old South End NRSA's. The total cost of these demolition activities totals approximately \$4.9 million. Within the same time, the city has also conducted 68 home repairs projects in the same NRSA areas. Based on these statistics, within the Old South End and Englewood NRSA's for every home repaired, six are demolished creating an increasing rate of vacant lots within the two areas over the last three years.

Figure 16: Englewood Home Repairs



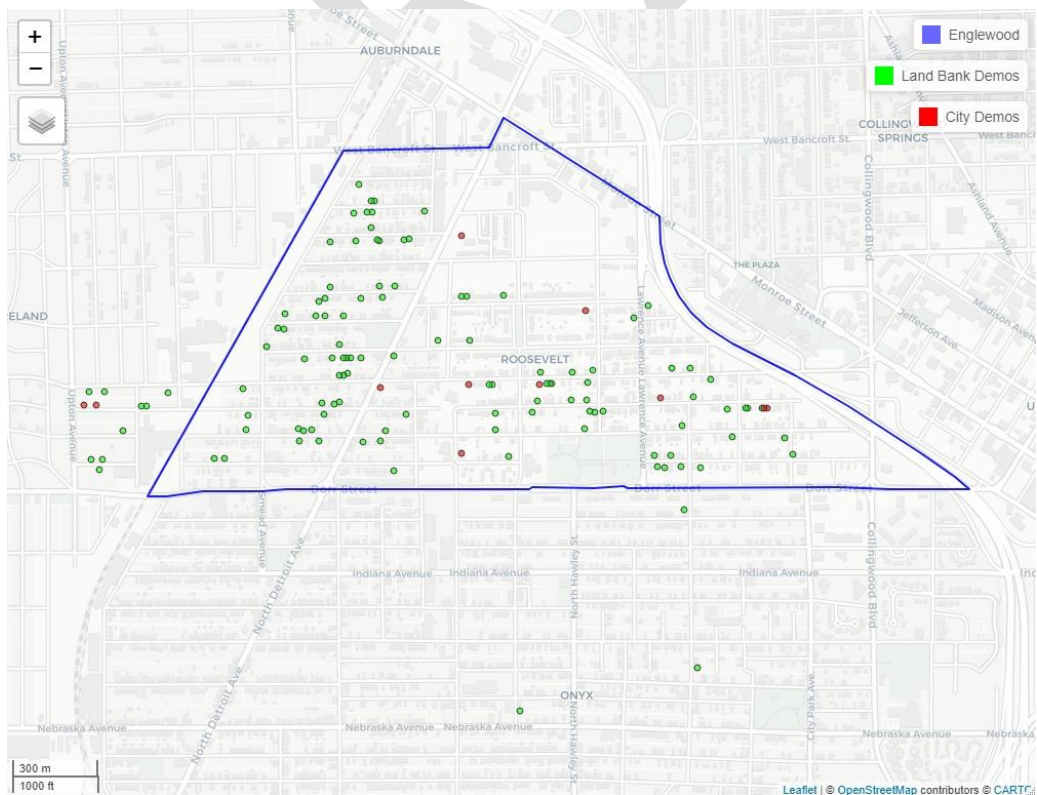
Source: City of Toledo, RKG Associates

Figure 17: Old South End Home Repairs



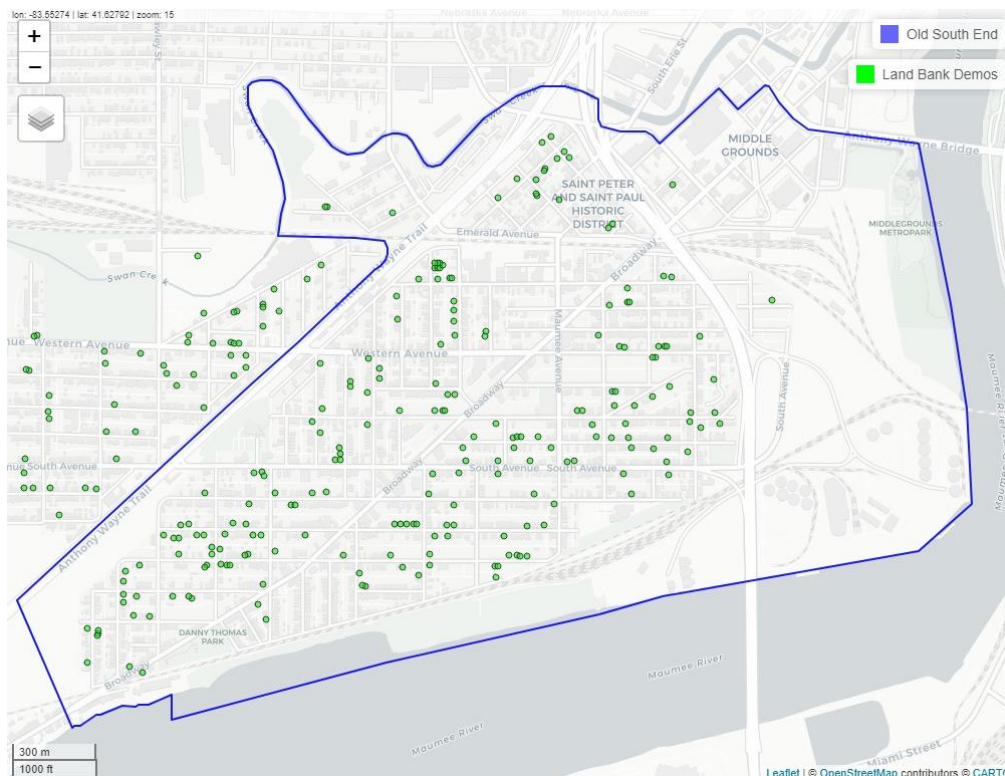
Source: City of Toledo, RKG Associates

Figure 18: Englewood Demolitions



Source: City of Toledo, RKG Associates

Figure 19: Old South End Demolitions

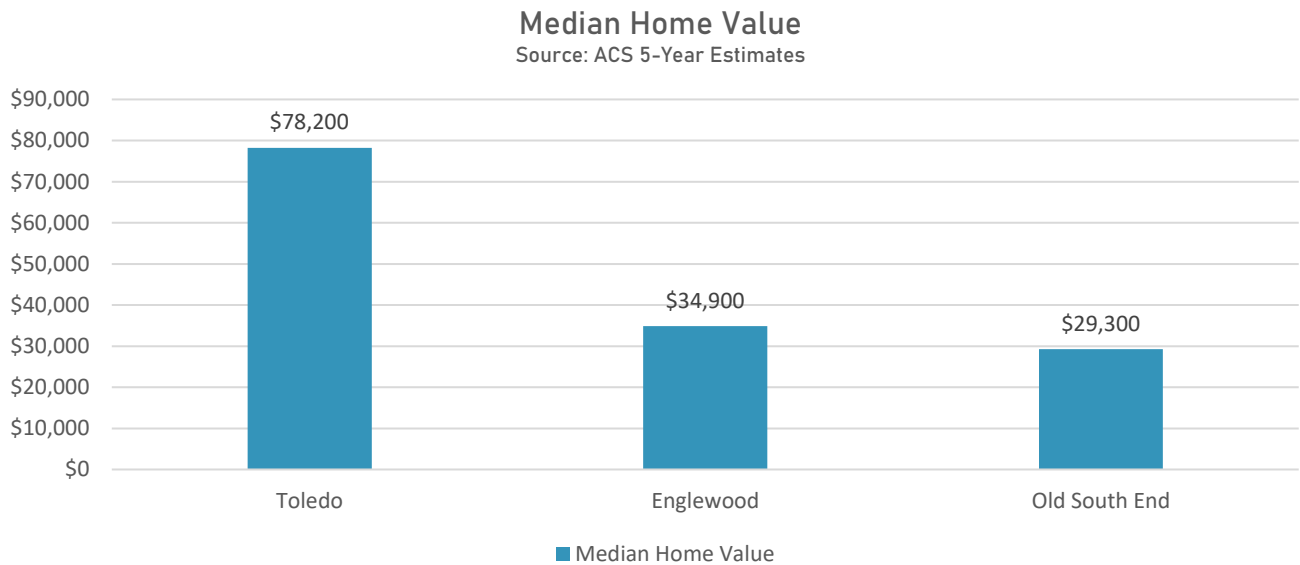


Source: City of Toledo, RKG Associates

MEDIAN HOME VALUE

The median value of homes in Toledo was \$78,200 in 2015 which is almost half the value of homes across Lucas County, and \$206,400 less than the median value across the United States. The latest ACS one year update shows that the median home value in Toledo is \$84,600. Median home values in both Englewood and the Old South End are over 50% below that of Toledo. The age of the housing stock, median household incomes, and impacts of both the Great Recession and COVID-19 have created a significant housing challenge for many of Toledo's neighborhoods. Owner-occupants may find it challenging to keep up with on-going maintenance and rehabilitation needs given current incomes and what may be available to a household to maintain homes over time.

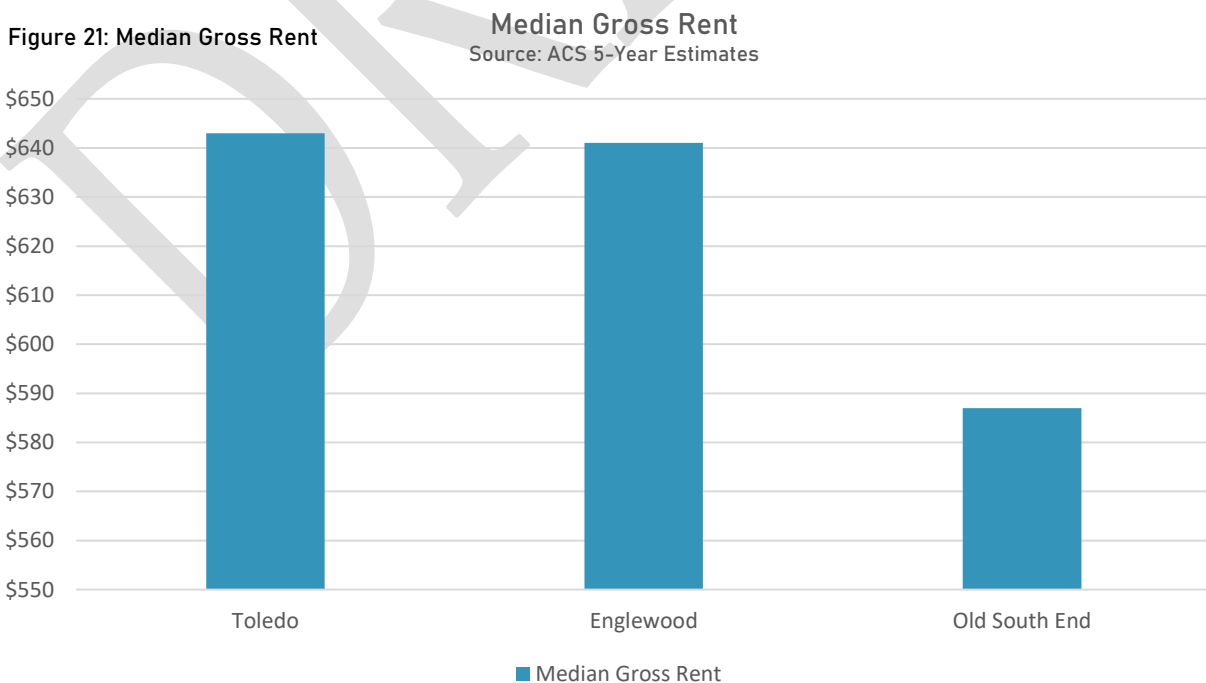
Figure 20: Median Home Value



MEDIAN GROSS RENT

In 2015, the median gross rent for a unit in Toledo was \$643 per month which was lower than the median for Lucas County (\$760). By comparison, median gross rent in the United States was \$1097 per month. Both the Englewood and Old South End NRSA's fall below the Toledo median gross rent with Old South End marking around \$587 and Englewood reflecting a gross rent like the rest of the city at \$641. More recent ACS estimates from the Census Bureau shows median gross rent for Toledo at \$737, Lucas County at \$760, and for the United States \$1,096.

Figure 21: Median Gross Rent



Quality of Life

In addition to demographic, economic, and housing conditions, the improvements within the NRSA should also consider quality of life. These issues and opportunities go hand in hand with NRSA changes and can also be factors the City focuses on in addition to the physical changes to housing and business development in each area.

EDUCATION

Education strongly correlates to income, prosperity, and quality of life. One way to measure the educational opportunity is to look at educational attainment of residents 25 years and older. Data in Table 3 from the Census provides a detailed snapshot of the education of residents within each NRSA and the City of Toledo. Overall, each NRSA tracks very closely to the city with one-third of residents having a high school diploma and another third having some college education. Between 4 and 12 percent of residents across both NRSA's have earned a bachelor's degree or higher. Aside from those who earned a bachelor's degree or higher, both NRSA's also diverge from city-wide percentages in those who have not completed high school, with Englewood at 8 percent over Toledo and Old South End at 17 percent over Toledo-wide percentages.

Table 3. Educational Attainment			
	Englewood	Old South End	Toledo
No High School	22.7%	31.8%	14.8%
High School Graduate	32.8%	34.6%	34.0%
Some College	32.9%	28.9%	33.8%
Bachelor's or Higher	11.7%	4.7%	17.4%
Source: ACS 2015			

CRIME RATE

Incidents of crime can be a major contributor to quality of life and feeling of safety in a neighborhood or city. Higher incidents of crime can also be tied back to the opportunities a neighborhood or city has to offer its residents such as access to jobs, the quality of the educational system, safe and secure housing, quality of the built environment, and access to before and after school activities for students. According to the City of Toledo's RMS Crime Incidents data, between 2018 and 2021 incidents of crime in Englewood and Old South End have remained stable at 6 percent of citywide crime. Across that same timeframe, the highest instances of crime fell within three major categories, auto theft, burglary, and weapon offenses. As of mid-2021, the highest instance of crime in Englewood was weapon offenses and in Old South End, burglary. Utilizing the NRSA strategy can help bring added investment in housing, infrastructure, and jobs to these neighborhoods to help create more opportunities for residents and improve the places they live and reduce the likelihood of crime.

VACANT LAND

An on-going challenge in the City of Toledo is the presence of vacant and dilapidated structures across many neighborhoods. To combat the visual and physical impacts of these vacant structures, the city and the Toledo Land Bank have worked tirelessly to demolish vacant structures. The Land Bank conducted a Community Conditions Report in 2014-2015 and was updated in 2021. As was noted above, about 419 buildings have been demolished over the past three years in and around the two NRSA's. Table 4 compares the types of properties within the two NRSA's and the City, because of the 2021 Community Conditions Report. It should be noted that the number of vacant lots has increased from these metrics based on the ratio of demolitions to home repairs as stated above. Since, the 2014-2015 report, the number of vacant lots in Englewood, Old South End, and the city overall have increased. The number of residential homes and non-residential structures in Englewood, Old South End, and the city overall have decreased since 2014-2015.

Table 4. Type of Property						
	Englewood #	Englewood %	OSE #	OSE %	Toledo #	Toledo %
Vacant Lots	998	44%	1,161	33%	21,487	18%
Residential Homes	1,207	53%	2,173	62%	90,471	76%
Non-Residential	54	2%	147	4%	7,326	6%
Total Parcels	2,259	100%	3,481	100%	119,284	100%
Source: The Toledo Survey: Community Conditions Report 2021						

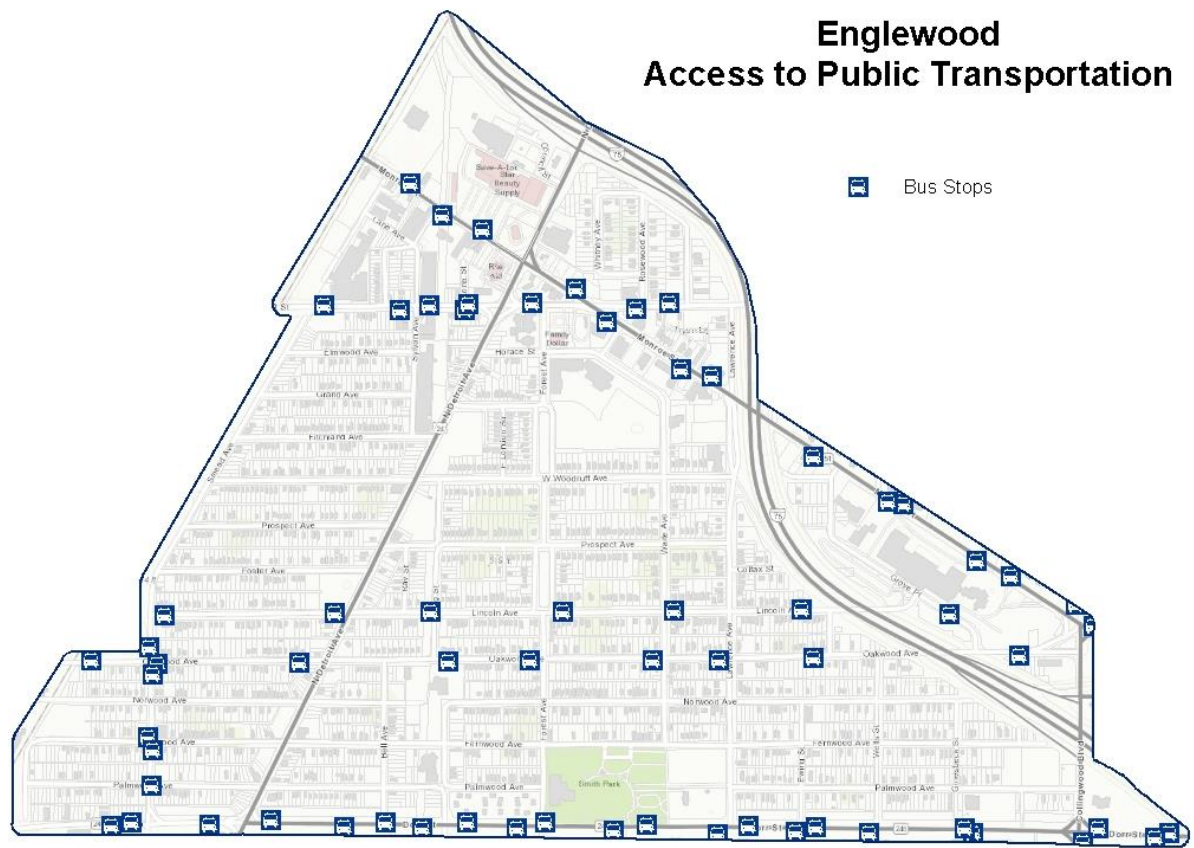
In Englewood, 402 vacant lots and 125 vacant structures are tax delinquent and in Old South End and property taxes are current for 55% of the neighborhood. In Old South End, 424 vacant lots and 129 vacant structures are tax delinquent and property taxes are current for 60% of the neighborhood.

ACCESS TO TRANSPORTATION

Transportation is a key component of an individual or family's quality of life. Transportation provides access to jobs, school, healthcare, childcare, grocery stores, parks, and recreation, and much more. Seventy percent of Toledo residents are over the age of sixteen and in the workforce. 81.1 percent of which drove to work alone in a personal vehicle, while 11 percent carpooled. Only 2.6 percent of Toledo's working residents utilized public transportation to get to work. The large majority, 85 percent, of Toledo resident workers had access to at least one personal vehicle for commuting purposes. About 13.1 percent of resident workers did not have access to a vehicle and are primarily concentrated in downtown neighborhoods such as the NRSA's limiting access to dense job areas.¹ The need for a vehicle is driven by both the car centric development of the city, and the concentration of jobs outside of the downtown metro area. This necessitates access to a vehicle as many transit routes may not connect to outside employment centers or the commute time plus transit frequency makes the trip less convenient.

¹ ACS 2015, Table B08141.

Figure 22: Englewood Transit Coverage

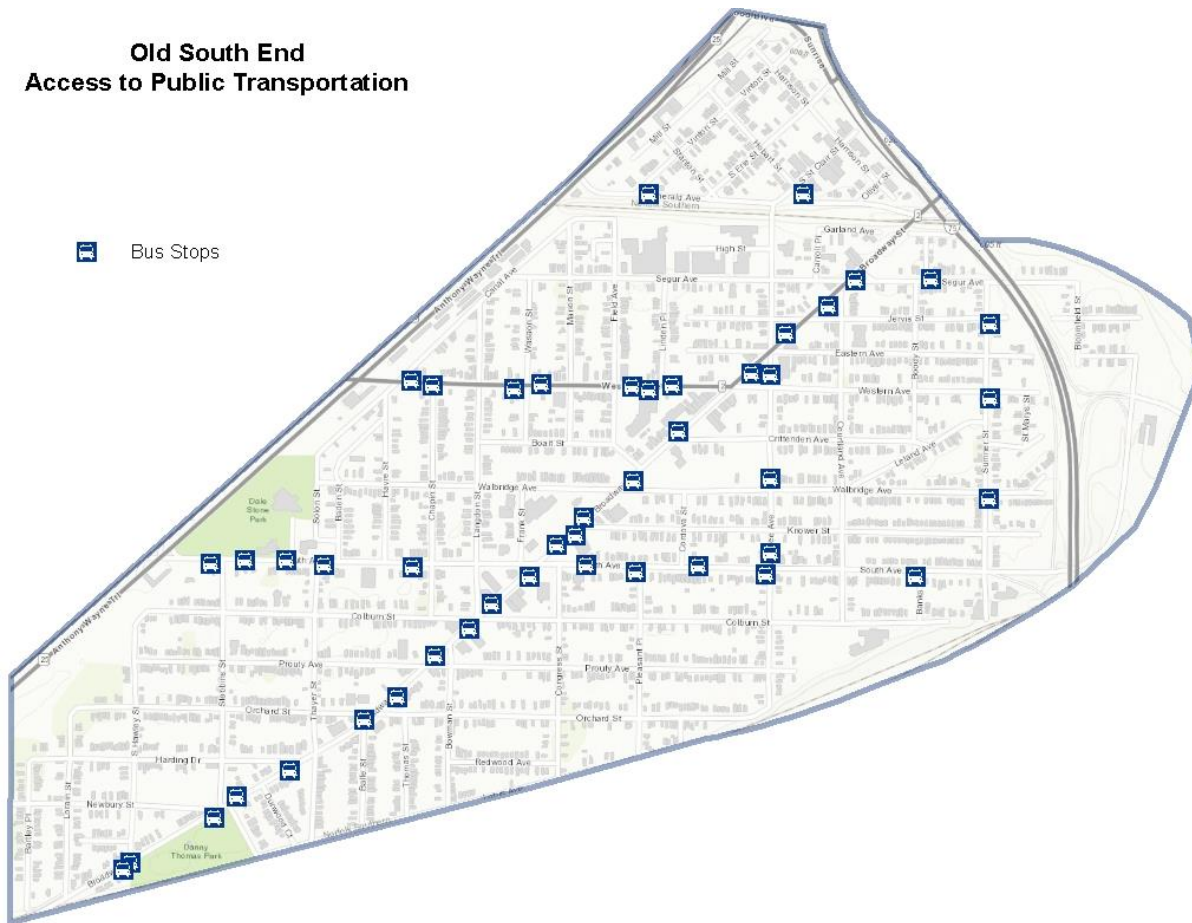


Source: City of Toledo

For jobs located in the City of Toledo, the transit routes managed by the Toledo Area Regional Transit Authority (TARTA) offer access to the downtown areas quite extensively but fall slightly short in access to denser neighborhood areas such as the Englewood and Old South End NRSA's. Survey respondents and focus groups from the City of Toledo Analysis of Impediments to Fair Housing Choice have also noted that the frequency of stops and hours of service are quite limited offering numerous barriers to residents who rely on public transit. Figures 22 and 23, mapped by the City of Toledo, provide snapshots of TARTA's transit coverage within the two NRSA's.

Figure 23: Old South End Transit Coverage

Old South End Access to Public Transportation



 Bus Stops

Source: City of Toledo

X. Housing And Economic Opportunities/Empowerment Strategy

Empowerment Strategy

For each of the proposed NRSAs, the City of Toledo through its Department of Housing and Community Development (DHCD) will conduct an economic empowerment strategy with housing and economic development components that will facilitate economic progress through the flexibility provided by the NRSA rule. One of the objectives of the NRSA designation is to attract other non-CDBG governmental investments, County, State, and private sector investments. Economic progress will be measured by a quantifiable increase in affordable housing, preservation of existing single family and multi-family rental housing, commercial corridor and small business development, neighborhood stabilization, and job creation/contracting opportunities that will be of principal benefit to low- and moderate-income (LMI) individuals and households. As a result of the projected increase in investments in the proposed NRSAs, there will be a need for additional public and social services to support program design and implementation for community engagement, workforce development, education, homeownership counseling, and other initiatives. Empowerment strategies will include the following:

- Housing Opportunities:** Develop housing opportunities available to households with a broad range of incomes to meet the needs of LMI (80% AMI or less) homeowners and renters and to attract middle-income households (up to 120% of AMI). The provision of subsidies and the control of equity in owner-occupied affordable housing will assist in managing redevelopment without gentrification. Preservation of existing housing stock is also a need due to the older housing stock in the City's neighborhoods. In September 2021, the City prepared a citywide comprehensive housing strategy titled *"Toledo Together: A Guiding Vision & 10-Year Action Plan for Housing."* The Strategy affirmed the need for safe, affordable housing and financing, support for home rehabilitation, and direct assistance for residents as solutions.
- Economic Opportunities:** Public infrastructure, housing, and commercial real estate projects are anticipated to generate construction and related jobs over the five-year period of the NRSA. Construction contracts funded by federal grants are subject to HUD Section 3 which requires that jobs and contracting opportunities are made available for low-income residents especially those located in the target area. These strategies will contribute to the economic stability and self-sufficiency of LMI households and persons.
- Public Services Opportunities:** Programs will include financial and technical assistance including working capital, equipment, and workspace improvements for small businesses and microenterprises. The strategy should include support services such as job training, transportation, education, health, and childcare which are public services eligible under CDBG regulations. The use of designated Community Based Development Organizations (CBDO) undertaking a neighborhood revitalization, community economic development, or energy conservation project [24 CFR 570.204(b)(2)(ii)] will create economic opportunities.
- Neighborhood Revitalization Opportunities:** In January 2021, the City commissioned an assessment of its approach to the enforcement of housing and building codes contained in a

report titled “A More Strategic, Equitable Approach to Housing and Building Code Enforcement in Toledo.” Housing and building code enforcement is critical in improving living conditions in neighborhoods that have been plagued by substandard housing conditions, vacant, abandoned, and deteriorated properties; one of the goals of the NRSA strategy. The assessment calls for a more proactive, equitable, tailored, strategic approach, strong partnerships, tracking and analysis of enforcement outcomes for higher impact results. Education and outreach and a sense of community pride to address code enforcement was a major recommendation of the report. The impact of poverty on people’s ability to maintain their properties requires a path for code compliance outside of the courts. The City has initiated a code enforcement pilot in Englewood.

Achieving diversity, equity, and inclusion is also a valued objective as the City was one of the principal actors in the formation of the Toledo Racial Equity and Inclusion Council (TREIC). The TREIC *“was formed to facilitate the development of a community strategy to address the root causes of poverty, dismantle systemic barriers caused by structural racism, and build wealth within communities of color.”*

Housing Opportunities

The City’s Comprehensive Housing Strategy identified four strategy areas and actions steps that will be used to inform the housing strategies within the NRSAs. See table below.

Strategy Areas	What Does Change Look Like?
Resources & Capital	<ul style="list-style-type: none"> • Create new and more flexible housing resources. • Increase competitiveness for housing resources. • Engage more cross-sector partners in local housing activities.
Land Use & Entitlements	<ul style="list-style-type: none"> • Align land use and development processes with housing activities. • Increase flexibility & consistency for residential & mixed-use development. • Reduce (re)development costs and risk.
Housing Policy & Programs	<ul style="list-style-type: none"> • Create a cohesive policy to guide housing, economic development, and land use decisions. • Maximize use of existing resources across local housing programs. • Create new policies or programs to support housing and economic mobility initiatives.
Neighborhood Empowerment	<ul style="list-style-type: none"> • Build community-based capacity & neighborhood voice. • Increase representation in housing activities. • Close equity gaps in housing outcome.

The City will focus its CDBG funds in the NRSA, which will be leveraged with other financing sources, to conduct the following affordable and mixed-income housing activities:

- **Single-family owner-occupied home repairs** – loans or grants will be provided to homeowners whose household incomes are at 80% or less of AMI. Programs will include specialty repair activities such as those for seniors, emergency, disability retrofits, lead based paint, and energy savings/weatherization. The City will also consider the design of a home

repair loan program which will leverage lender financing at lower rates and allow for CDBG funds to be used to assist households with incomes over 80% and up to 120% of AMI. CDBG funds can be used to assist homeowners with incomes above 80% AMI in the NRSA if at least 51% of the houses assisted must be for LMI homeowners.

- **Lead abatement grants** – The City receives funding under the federal Healthy Homes – Lead Hazard Reduction Demonstration Program for lead abatement. An estimated \$3.4 million will be spent over the next five years of the NRSA period. Grants to households with children under six years of age who either live in or frequently visit the property will be provided. This process can involve the installation of new windows, doors, and siding. The City works with Lucas County, the State of Ohio and a local NeighborWorks entity to prioritize eligible families through the application process and into the program that can best address the lead hazards that may be present in their home. Also, COT was awarded \$5.7 million from the Office of Lead Hazard Control and Healthy Homes (OLHCHH) that commenced on 01/04/2021 and will run through 06/30/2024. The program is to provide financial assistance to property owners to help control lead paint hazards in either owner-occupied and rental residential units where a pregnant female resides or a child under of the age of 6. Property owners from the two NRSAs are eligible to apply for these funds.
- **Acquisition and rehabilitation of existing vacant properties** – CDBG funds will be used to partner with local community development corporations (CDCs) and lenders to preserve affordable housing through acquisition and rehabilitation of single-family houses for sale. The lender would provide loans at concessionary rates along with grants or loan guarantees to facilitate homebuying.
- **Conversion of LIHTC units to homeownership** - The City will facilitate the conversion of expiring single family low-income housing tax credit rental units into homeownership opportunities to low-income households. The tenants in the units at the expiration date of the tax credits will be offered first option to purchase with the units being renovated and the buyers being assisted to improve credit scores and secure mortgages, as applicable. Tenants who do not qualify will continue paying rent until they qualify.
- **Increase in homeownership through low interest mortgages** – The City will work with private sector lenders and partners to provide low interest mortgages for households up to 120% AMI who wish to purchase homes. The City will provide CDBG and HOME funds to assist LMI households and individuals including those within NRSAs to purchase existing houses for homeownership. City funds will also be used to provide down payment and closing costs assistance to purchase existing houses for rehabilitation and resale.
- **New construction of homeownership and rental housing on vacant lots** – The City will use HOME and NSP Program Income funds along with other sources to redevelop vacant lots through new construction of houses to support the City’s code enforcement and community improvement goals. The use of the NRSA strategy will allow for mixed-income housing for households up to 120% AMI. The City will designate and use eligible community-based development organizations (CBDOs) to facilitate the use of CDBG funds in this case.

Slum and Blight Reduction for Neighborhood Stabilization

The City will provide CDBG funds for slum and blight reduction and elimination on an area or “spot” basis including within the two NRSAs. The City’s code enforcement strategy is focused on low-and-moderate-income neighborhoods

Demolitions

The City, through its Division of Code Enforcement, a division of DHCD partners with the Lucas County Land Bank to conduct a comprehensive demolition strategy. Approximately \$1,250,000 million of CDBG is slated for commercial and residential demolition including the two NRSAs over the next five (5) years.

Economic Opportunities

The City’s NRSA plan will help to improve the economic self-sufficiency of NRSA residents through an economic development strategy aimed at job creation/retention, financing, and technical assistance for small businesses and microenterprises that benefit low-to-moderate-income households.

Over the next five (5) years, approximately \$250,000 in CDBG funding is expected to be invested in economic development activities which includes Façade Improvements Grants and White Box Build Out Loans, Small Business Development Program, Business District improvements, healthy food initiatives, and workforce development. The City’s DHCD is currently implementing these programs citywide and will set-aside CDBG funding in the NRSAs.

The City will support its economic development activities by using CDBG Public Service funding for activities that prepare the workforce to meet the demands of the increased activity in the NRSAs.

1. Support for Small Businesses and Microenterprises

Small Business Support

The City has an existing citywide business loan program which could be targeted to the NRSAs through a set-aside. The assistance in the NRSAs could include the following:

- Grants, loans, loan guarantees and other forms of financial support for the establishment, stabilization, and expansion of small businesses and microenterprises.
- Technical assistance, advice, and business services to small businesses.

Business Districts or Commercial Corridor Support

The City will invest CDBG funds over the next five years to help revitalize neighborhood commercial corridors in the NRSAs. This assistance could include the following:

- Business façade improvements, streetscapes, and other activities for business development.
- Development of business financing products, leveraging new market tax credits and private sector financing that will support businesses on the corridors.

- Promote diversity, inclusion, and equity through the creation of subcontracting opportunities for small businesses and microenterprises from business district infrastructure improvements.
- Identification and rehabilitation of vacant buildings for small business space.

The overall benefits to residents in the NRSAs include better access to goods and services available, healthier food options in their neighborhood and new jobs for Toledo residents.

2. Job Creation/Retention

The financing and technical assistance activities to support business activity and growth in the NRSAs and the development of business are intended to create or retain jobs along with provided services and products to the areas. The planned investments in business, infrastructure, and housing will generate temporary jobs during construction and permanent jobs upon completion of the projects.

3. Economic Development Public Services

Workforce Development Services

For residents to benefit from the jobs generated by the NRSA investments and employers to have access to an adequate talent pool in Toledo, jobseekers need the widest range of job-related services.

The City will take advantage of the NRSA benefit of the waiver of the CDBG 15% public services cap to fund CBDOs that facilitate workforce development services such as job training, skill building, employment counseling, and job retention for “at risk” and low-income individuals to help them gain valuable workplace experience. Funds will be leveraged with private donations and federal grants.

4. HUD Section 3

Recipients of CDBG and other federal grants are required under Section 3 of the Housing and Urban Development Act of 1968, to provide training, employment, contracting and other economic opportunities, to the greatest extent possible, to low- and very low-income persons, especially recipients of government housing assistance, and to businesses that provide economic opportunities to low- and very low-income persons. Also, HUD requires that grantees make efforts to do outreach to minority owned, women owned, and disadvantaged businesses to increase equity and inclusion. Section 281 of the National Affordable Housing Act requires each participating jurisdiction to prescribe procedures acceptable to HUD to establish and oversee a minority outreach program. The City could help to create workforce development programs in construction skills through programs such as LISC’s Financial Opportunity Center model. The City could also establish or use existing small business lending programs for residents to take advantage of the Section 3 economic opportunities.

XI. 2022-2026 Performance Management Benchmarks

This section establishes benchmarks for the key activities in this plan, and the City's accomplishments against its benchmarks will be reported in the Integrated Disbursement and Information System (IDIS) on a quarterly basis. The specific estimates listed below will be entered into HUD's Integrated Disbursement and Information System (IDIS) under the accomplishments screens by each NRSA:

- LMA Accomplishment – LMASA – low/moderate area benefit, NRSA - Englewood
- LMH Accomplishment – LMH - low/moderate housing benefit, NRSA – Old South End

The City will meet with stakeholders and residents each program year to solicit input in assessing the previous year's NRSA accomplishments ~~versus~~ compared to the proposed goals and objectives identified in this Plan. The Department of Housing and Community Development (DHCD) will identify variances or delays in meeting goals and make program design or implementation changes, if necessary.

Over the five-year period of the NRSA strategy, the City will work to accomplish the benchmarks against its goals and objectives in the Old South End and Englewood NRSAs:

A. Affordable Housing Priority Objectives include:

- Improve quality of housing stock
- Expand homeownership opportunities
- Increase the supply of decent affordable housing

B. Economic and Human Capital Development Priority Objectives include:

- Create and retain LMI jobs and assist businesses
- Expand workforce development opportunities for low – to moderate – income youth
- Develop commercial properties and façade improvements
- Toledo Health Homes Training Center

C. Neighborhood Improvements and Capacity Building Priority Objectives include:

- Increase code enforcement, demolition, and infrastructure improvements
- Improve neighborhood capacity through training local leaders and working with neighborhood stakeholders to implement the NRSA initiatives
- Increase in public service activities to support the NRSAs

GOAL 1: Expand and Preserve Affordable Housing

Benchmarks

1.1 Develop 148 affordable housing units (35 in Old South End and 113 in Englewood) to increase the supply of adequate housing for residents including seniors. Convert an abandoned industrial site into residential uses

1.2 Repair 180 owner-occupied single-family houses (80 in Old South End and 100 in Englewood) to improve the quality of affordable housing stock.

- 1.3 Increase safe and healthy housing through lead-paint abatement and weatherization assistance for 43 homes (20 in Old South End and 23 in Englewood).
- 1.4 Acquire & rehabilitate 25 vacant properties for homebuying & rental (15 in Old South End and 10 in Englewood).
- 1.5 Convert 55 low-income housing tax credit S/F rentals into homeowner units (20 in Old South End and 35 in Englewood).
- 1.6 Repair 150 roofs in the Englewood (100) and Old South End (50) NRSA.

GOAL 2: Increase Economic and Human Capital Development Opportunities

Benchmarks

- 2.1 Create/retain 40 jobs through assistance to small businesses/microenterprises (20 in Old South End and 20 in Englewood).
- 2.2 Support 20 businesses in commercial corridors in NRSA through funding for minority, women, & disadvantaged businesses (M/W/DBE). 10 in Old South End and 10 in Englewood.
- 2.3 Create 10 business spaces through the Vibrancy Initiative (7 in Old South End and 3 in Englewood).
- 2.4 Train, hire and retain 65 weatherization technicians and 70 lead workers (clearance technicians, lead risk assessors and lead contractors) through Toledo Healthy Homes Training Center in the Englewood.

GOAL 3: Neighborhood Improvements and Capacity Building

Benchmarks

- 3.1 Improve infrastructure in the commercial corridor in Old South End through \$7.8m in funding.
- 3.2 Increase in public services through two (2) community-based development organizations (CBDO) to support the NRSA strategies.
- 3.3 Demolition of 113 unsafe structures (23 in Old South End and 90 in Englewood through start a code enforcement receivership pilot).
- 3.4 Institute a Neighborhood Capacity Building Institute for non-profit agencies and train social service organizations from the two NRSA. Train 10 community leaders, five in each NRSA.
- 3.5 Possible identification, preparation, and designation of one CBDO in each NRSA.
- 3.6 Develop a working group of stakeholders in each NRSA coordinated by DHCD staff to assist with NRSA implementation.

Please see tables below with estimated annual outputs that will be monitored by COT during the NRSA period.

PERFORMANCE MANAGEMENT BENCHMARKS BY YEAR –OLD SOUTH END NRSA #1

Topic	Goals	Strategy	Benchmark	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Affordable Housing	Increase the supply of adequate housing for residents including seniors	Housing new construction	Houses added	0			15	20	35
	Repair owner-occupied S/F houses to improve housing	Home repair loan program	Housing units repaired	16	16	16	16	16	80
	Increase safe and healthy housing with lead paint abatement and weatherization	Lead paint repair & weatherization	Housing units addressed	2	4	4	5	5	20
	Acquire & rehabilitate vacant properties for sale & rental	Acquisition & rehabilitation	Houses preserved	3	3	3	3	3	15
	Convert LIHTC low-income S/F rentals into homeowner units	Homeownership & preservation	Houses sold	4	4	4	4	4	20
	Repair 50 roofs in the NRSA	Home repair program	Housing units repaired	5	10	15	15	5	50
Economic and Human Capital Development	Create/retain jobs through assistance to small businesses/microenterprises	Small business loans & grants	Jobs created	0	5	5	5	5	20
	Support Broadway Business District in Old South End	Small business loans & grants	Businesses assisted	0	2	3	3	2	10

Topic	Goals	Strategy	Benchmark	Year 1	Year 2	Year 3	Year 4	Year 5	Total
	Create business spaces through Vibrancy Initiative	Loans, grants, & technical assistance	Businesses assisted	0	2	1	2	2	7
Neighborhood Improvement and Capacity Building	Increase in public services to support NRSA activities	Public services through CBDOs	Persons served	0	0	0	1	0	1
	Improve infrastructure to commercial corridor	Improved living conditions	Corridor completed	0	0	1	0	0	1
	Improve living environment through code enforcement & demolition of unsafe structures	Strategic code enforcement and demolition	Demolitions Properties received	3	4	5	5	6	23
	Build neighborhood partner capacity through the Neighborhood Capacity Building Institute	Training and capacity building	Persons trained	1	1	1	1	1	5
	Designation of CBDO to provide additional public services	Identification, designation & orientation	Agencies designated	0	0	0	1	0	1

PERFORMANCE MANAGEMENT BENCHMARKS BY YEAR – ENGLEWOOD NRSA #2

[illegible]

Topic	Goals	Strategy	Benchmark	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Economic and Human Capital Development	Create/retain jobs through assistance to small businesses/microenterprises	Small business loans & grants	Jobs created	0	5	5	5	5	20
		Small business loans & grants	Businesses assisted	0	2	2	3	3	10
	Create business spaces through Vibrancy Initiative	Small business loans & grants	Businesses assisted	0	0	1	1	1	3
Workforce Dev. Pilot – Toledo Healthy Homes Training Center.	Create and retain jobs through training program.	Train, Hire and Retain Jobs	Jobs Created	27	27	27	27	27	135
Topic	Goals	Strategy	Benchmark	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Neighborhood Improvements and Capacity Building	Increase in public services to support NRSA activities	Public services through CBDOs	Persons served	0	0	0	1	0	1
	Improve living environment through a code enforcement receivership pilot & demolition of unsafe structures	Strategic code enforcement and demolition	Demolitions Properties received	18	18	18	18	18	90

	Build neighborhood partner capacity through the Neighborhood Capacity Building Institute	Training and capacity building	Persons trained	1	1	1	1	1	5
	Designation of CBDO and implementing agency	Identification, designation, & train	Agencies designated	0	0	0	1	0	1

XII. NRSA Coordination Strategy

The projected investments and activities that the NRSAs will attract will generate the need for supportive services such as housing counseling, workforce development, capacity building, and leadership development. HUD expects the city to achieve substantial improvements and generate housing and economic opportunities within the NRSAs. A clear and well-coordinated implementation plan is needed to ensure the success of the NRSAs. The City's Department of Housing and Community Development (DHCD) will have the ultimate responsibility for implementation and compliance for CDBG and HOME grant funded activities within the two NRSAs. The DHCD will coordinate and manage the implementation of its NRSA strategy through the following framework:

- A NRSA Redevelopment Coordinator responsible for planning, coordinating, monitoring, and reporting on activities in the NRSAs. The position is funded and will be posted. The roles and responsibilities of the coordinator will include:
 - a. Recruit and work with non-profit and for-profit organizations to implement City funded NRSA activities. Certify community-based development organizations (CBDOS).
 - b. Ensure that subrecipient and contractor agreements contain any required NRSA goals and requirements.
 - c. Conduct NRSA orientation/training of staff from other departments and partners.
 - d. Track and report on proposed leveraged sources for the NRSA from other City departments and external partners including profiles on completed projects in the NRSAs, type and amount of funds used to undertake them.
 - e. Collect program output data from program participants and ensure input into IDIS.
 - f. Coordinate and participate in at least an annual public meeting to report on goals and receive public input.
- Establish an Englewood NRSA working group to assist the coordinator with the implementation of activities in that NRSA. The working group will consist of community leaders, representatives of non-profits, funders, major institutions, and other stakeholders. The group will meet monthly and be segmented into committees overseeing focus areas such as economic development, housing, healthy foods, and public services.
- Establish an Old South End NRSA working group to assist with NRSA implementation with a membership, meeting, and committee structure like the Englewood working group. The Old South End NRSA will also include a committee on Infrastructure/Streetscape.
- The City's commitment to invest recently approved Section 108 loan funds within the two NRSAs will be coordinated through a Section 108 Revolving Loan Committee. The committee will consist of the City's Director of Economic Development, the DHCD's Housing and Administrative Services Commissioners, the Lucas County Land Bank, representatives from banks, and community development financial institutions (CDFIs).

In addition to the above management structure, the city will use the following strategies to develop and provide support services to the two NRSAs:

- Identify and develop Community Based Development Organizations (CBDOs) to facilitate the use of CDBG funds for new construction and increased public services.
- Build/enhance nonprofit and community leadership capacity to implement NRSA strategies and support activities through a Neighborhood Capacity Building Institute pilot.
- Build local developer capacity and create developer incentives.
- Ensure that NRSA activities promote and achieve the City's goals of diversity, equity, and inclusion (DEI) for persons of color through its racial equity and inclusion initiative.
- Survey area businesses to gauge post-pandemic availability and need for services.
- To prepare community residents for jobs created by investments, collaborate with a 4-county metropolitan statistical area (MSA) workforce partnership for employment training and workforce development. Partner with other agencies to provide access to childcare, transportation, etc.
- Provide and leverage CDBG financing and technical assistance with other private and public sources to assist large and small employers (including microenterprises) that create or retain jobs for economic stability and self-sufficiency.
- Attract employers through creation of commercial/business space.

Please see Attachment I for the DHCD's organizational chart which shows the management structure for the NRSAs

XIII. Monitoring and Reporting

The Department of Housing and Community Development (DHCD) staff will be responsible for monitoring the performance of subrecipients and developers undertaking activities in each of the two NRSAs and compare that to the NRSA objectives and goals proposed in the FY 2022 – 2026 NRSA Application. The City's NRSA monitoring process will consist of ensuring that NRSA goals and objectives are clearly outlined in each CDBG agreement related to the NRSAs. The city will also identify the NRSA benchmarks that it expects to achieve for each program year in its Annual Action Plan. At the beginning of each program year, the DHCD staff may conduct a risk-based assessment of subrecipients or other partners who undertake CDBG activities in the NRSAs. Based on the level of risk identified, the city will determine the frequency, level, and type (desk review, onsite) of monitoring that will be conducted. The HUD NRSA Monitoring Checklist (see attached) will be used as a guide when monitoring subrecipients. Training on NRSA compliance and monitoring will be provided to ensure the data collection is streamlined. The city will use HUD Exhibit 3-16 titled Guide for Review of Subrecipient/Community-Based Development Organization (CBDO Management) when performing on-site monitoring on an annual basis. Exhibit 3-15 titled Guide for Review of a HUD-Approved Neighborhood Revitalization Strategy Area (NRSA) will be used to monitor the overall implementation of the NRSAs. See link to CPD Monitoring Handbook: [CPD Monitoring Handbook- HUD Exchange](#).

Reporting

The following steps will be used to track progress and manage the NRSA strategy:

- At the end of each quarter or at least semi-annually, the assigned NRSA staff will review the progress and performance of NRSA activities. The purpose of the review is to identify and address potential issues and challenges with the implementation of the NRSA strategy.
- All records related to the NRSA, including the NRSA plan, reports, and meeting minutes, will be maintained by the relevant staff person.
- Each subrecipient, CBDO, or contractor that undertakes work in an NRSA with CDBG funds will be responsible for reporting on projects completed to the NRSA Coordinator on a schedule to be determined and using a data form provided. Collecting and tracking data is critical to ensure that the city is making progress with the NRSA designation and revitalizing the target area. The periodic reporting will allow the DHCD to review the proposed activities under the NRSA Plan and assess whether the activities are meeting the goals of the NRSA Plan. Each year during the Annual Action Plan planning process, the NRSA Coordinator will make sure that the NRSA goals and objectives are reasonable and on track to meet the overall goals in this Plan. If the projected outputs are showing a significant change in the number of people being served, the city will adjust the Annual Action Plan and share the NRSA information with HUD.
- The city will report its NRSA progress at the end of each program year in its HUD Consolidated Annual Performance Evaluation Report (CAPER). The NRSA Coordinator will review the IDIS Online Report **PR84: CDBG Strategy Area Report** and activity-specific information on the **PR03: CDBG Activity Summary Report** to ensure IDIS accurately reflects information submitted by subrecipients and City staff. Any inaccuracies or omissions will be forwarded to the IDIS input staff for correction in IDIS.

Documenting Impact

- The NRSA Coordinator will prepare an annual report that compares NRSA accomplishments to proposed goals and evaluates the City's progress in meeting them including:
 1. A list of the investments leveraged and benefits each year in each NRSAs.
 2. A summary of numeric accomplishments (outputs) for each of the CDBG-funded goals in each NRSA.
 3. A narrative description of how the accomplishments address the overall outcomes of the NRSA; and
 4. A summary of the consultation and participation with the NRSA stakeholders throughout the program year.

- The NRSA Coordinator will hold a meeting with stakeholders and residents of the NRSA target area to review the NRSA annual report and evaluate the performance of the funded projects (*depending on timing, this meeting could be combined with the Annual Action Plan*).

The Consolidated Planning framework provides the city with a way to evaluate the NRSAs during the designation period. The impact will be assessed on an ongoing basis and will be documented as follows:

- GOAL: What do we want to accomplish?
- STRATEGY: How are we going to accomplish that goal?
- METRICS: What will we measure to know that we are making progress? Are there specific milestones we aim to meet? Over what timeframes?
- OUTCOMES: How much progress have we made toward our goal at a given point in time?

Please see Attachment F for the NRSA impact matrix.

XIV. Strategic Partnerships

The available resources provided through the CDBG, and other federal grant programs are usually insufficient to meet the needs of the communities they are intended for. The implementation of community revitalization strategies is successful when the community takes advantage of partnerships among federal and local governments, the private sector, community organizations, and neighborhood residents. Leveraging of financing, technical skills, and capacity are critical to the City of Toledo's ability to carry out the activities described in Section X and achieve the identified performance measures and outcomes in Section XI. Dependent on the partner capacity in the NRSAs, the DHCD will use an implementation framework that uses a primary implementation entity or a set of work groups that are coordinated by DHCD staff. The City maintains current relationships with many stakeholders in the community including those listed below to implement the strategies outlined in the NRSA plan.

The cross-sector partnerships serve to lay the groundwork for community growth; make neighborhoods attractive for investment; and ensure that the benefits of economic activity remain in neighborhoods for long-term development. During the five years of the NRSA plan, the City will continue to identify and recruit other stakeholders to carry out the NRSA Plan.

Community Based Development Organizations (CBDOs)

As outlined in HUD Notice CPD-96-01 and using the criteria for CBDO designation at 24 CFR 570.204 and 570.207(b)(3)(iii), the City may certify and use CBDOs to support certain public service, new construction of housing, homeownership assistance, and community economic development activities in the designated NRSAs. The use of CBDOs in approved NRSAs allows the City to provide additional public services to support the increased public and private sector investments in the NRSAs

by removing the CDBG 15 percent public service activity cap limitations. Also, some otherwise ineligible CDBG activities such as new construction of housing may be done by CBDOs in the NRSAs. CBDOs are not considered subrecipients but may be designated as such by the City and all the rules regarding subrecipients will apply to that CBDO, including the requirement for reversion of assets.

The City is considering the following strategies to engage CBDOs on its investment strategy:

- **Certify non-profit organizations as CBDOs that currently have target areas that include or are coterminous with the NRSAs:** The CBDO provisions at 570.203(c) require that a CBDO must have a defined geographic area of operation. The NRSAs may include or be a part of a CBDO's target area(s). The DHCD proposes that CBDOs working within areas that include or are coterminous with NRSAs may expand their areas to include the NRSAs. The CBDO will be then able to work within the NRSAs. Also, since CBDOs are authorized to primarily operate in an identified area, there is a limited allowance for services to persons outside of the identified area.
- **Certify HOME community housing development organizations (CHDOs) as CBDOs, as applicable:** Existing HOME CHDOs may qualify as CBDOs and only automatically qualify as CBDOs if they serve a single neighborhood. The City must review and certify CBDOs.
- **Use of a CBDO in Multiple NRSAs:** CBDOs may serve a large or multiple NRSAs while maintaining "local control" through its board membership.
- **Recruitment of CBDOs—**CBDOs may be identified to partner with the City through several means. The City will allow interested organizations the opportunity to apply on a rolling basis to be CBDO approved and will be eligible for NRSA CDBG funding. The beginning of each calendar year, DHCD staff will review the approved CBDO list and check for compliance by reviewing the board makeup of the organization, discussions with organization staff, and obtaining LMI certifications (if applicable) for board members. If the CBDO still qualifies after the compliance check, they will continue to be on the approved CBDO list for the City. This does not guarantee an organization CDBG funding – however, this allows organizations to apply for CDBG that is otherwise capped or restricted per HUD regulations.
- DHCD may certify and use CBDOs to carry out new construction of housing as authorized under 570.204 (a). In addition to this, Community Housing Development Organizations (CHDOs) often have the same makeup that a CBDO has; the City will review DHCD-approved CHDOs to see if any CHDO qualifies as a CBDO. If a CHDO qualifies as a CBDO as well, the City will reach out to the CHDO to determine if the organization is interested and has the capacity to carry out CBDO-eligible activities located in the NRSAs.

Strategic Partnerships - NRSA1 Old South End and NRSA2 Englewood

The COT currently works with or plans to develop relationships with the following organizations that are in or serve the NRSA:

- **Believe Center** is a recreational and community center in the Old South End under a non-profit 501(C)(3) community organization that provides programs, arts, education, sports, and other full-service activities to youth and families. The center is located near to one of the major

entrances into the NRSA from the Anthony Wayne Trail called the Believe Center Gateway which has \$7.8m in approved infrastructure improvements. The organization currently receives CDBG funding under the public services category – 24 CFR 570.201(e).

- **Adelante** - The Latino and Community Resource Center is a 501(C)(3) non-profit organization that serves and empowers individuals and families in Northwest Ohio through education, prevention, economic literacy, health, and other social services. The organization currently receives CDBG funding under the public services category – 24 CFR 570.201(e).
- **Sophia Quintero Arts** - The Sofia Quintero Art & Cultural Center is a 501(C)(3) non-profit organization that supports local artists and provides interest, awareness, and education to the community about Latino art, heritage, and culture. The organization currently receives CDBG funding under the public services category – 24 CFR 570.201(e).
- **Historic South Initiative (HSI)** – HSI is a 501(C)(3) non-profit organization that has as its main objective to promote the ongoing development of a vibrant, thriving neighborhood in the Old South End NRSA. HSI achieves that objective through rehabilitation of housing for homeownership, primary and adult education, augmentation of community services, and creation of jobs and employment opportunities. HSI has coordinated several successful projects in the Old South End such as the Old South End Master Plan, L.E.D. lighting project along Broadway, rehabilitation of housing, Carnegie Library Building renovation, construction of Little Caesar's Pizza location, Danny Thomas Park improvements, tuition assistance, and early childhood education. The organization receives HOME Investment Partnership (HOME) Program funds as a certified HOME Community Housing Development Organization (CHDO). HSI is planning a 120-unit new construction senior rental housing project with a for-profit developer using low-income housing tax credits (LIHTC).
- **Broadway Corridor Coalition (BCC), Inc.** - The BCC is a nonprofit community group focused on the Old South End of Toledo, Ohio. The community group has developed a master plan for the neighborhood in conjunction with Design Collective and the coalition is working on an amendment to the Plan. The amendment to the Plan is focused on the Broadway mile and encouraging business development along Broadway. All businesses on either side of the corridor will be targeted for small business loans, signage, streetscape, and façade improvements to benefit and build on the \$7.8m of infrastructure improvements. The BCC will develop specific loan products and standards for small businesses to be a part of discussions.
- **Toledo Design Collaborative (TDC)** is an urban planning and design entity that partners with neighborhood organizations and the City to advocate for thoughtful urban planning and design. A core belief of the Toledo Design Collective is thoughtful planning and urban design should be a right of every person, not just a privilege of the few. TDC frames its work around diversity, equity, and inclusion.
- **NeighborWorks Toledo Region (NHS)** is a 501 (C)(3) organization that is an affiliate member of Neighbor Works America and provides homeownership housing, owner-occupied rehabilitation, development, first mortgages, homebuyer education, financial counseling, and workforce development. NHS is an OHFA-qualified non-profit developer and State of Ohio

certified HOME Community Housing Development Organization (CHDO) and would be willing to partner with the city to provide affordable housing and other support services within the NRSAs. The organization is going through the City's HOME CHDO certification process and will receive \$150,000 for work in the Cherry Legacy Neighborhood. The organization provides its products and services Citywide but has current housing preservation projects in the Old South End and the Englewood NRSAs. They are collaborating with the City, Ohio Housing Finance Agency (OHFA), Land Bank, and private sector lenders to convert rental single-family houses into homeownership units when the low-income housing tax credit terms expire. NHS currently receives CDBG public services funds for its housing counseling programs. NHS also leads a \$4 million annual energy improvement program in partnership with the city, the State of Ohio Department of Energy, and local power companies Columbia Gas, First Emery, and Toledo Edison.

- **Toledo (Lucas County) Land Bank** is a non-profit organization that partners with the City of Toledo to take control of vacant, abandoned, and tax overdue properties and demolish unsafe structures. The goal is the transformation of those properties into green, healthy, occupied, and tax-paying units and assist in improving the lived environment of the neighborhood they work in. The Land Bank also assists residents with home renovations and businesses with updated store fronts. The Land Bank's Rebuild Invest Stabilize Engage (RISE) programs targeted both NRSAs as an investment and activity area. The Land Bank improved 659 parcels in Old South End and 546 parcels in Englewood already.
- **Toledo Local Initiatives Support Corporation** is a non-profit organization that produces economic development initiatives that help create vibrant neighborhoods of choice in the City of Toledo. Their mission is to work with residents and partners to forge resilient and inclusive communities of opportunity across America. They do this work through strengthening existing alliances while building new collaborations within the City of Toledo; leadership and capacity building of the partners they work with; equipping talent in underinvested communities with the skills and credentials to compete successfully for quality income and wealth opportunities; investing in business, housing, and other community infrastructure to catalyze economic, health, safety, and educational mobility for individuals and communications; and driving local regional, and national policy and system changes that foster broadly shared prosperity and well-being. Currently, LISC is working in the Old South End with Historic South, the Getting Healthy Zone Initiative, and beginning some work with the AmeriCorps program and the Toledo Opera. LISC has made significant investments in the Englewood NRSA and is assessing the Old South NRSA's neighborhood organizational capacity to do comprehensive community development.
- **City of Toledo Code Enforcement Division** is responsible for responding to complaints, eliminating nuisance, and enforcing health and safety regulations as it pertains to property maintenance and zoning codes in the City of Toledo. The City recently completed a Code Enforcement Program assessment which recommended goals and priorities to move code enforcement from reactive to strategic and proactive, improve greater use of data, consistent and equitable enforcement and safeguards, and a culture change to compliance and support.
- **Promedica Health – Ebeid Program** is a catalytic, multifaceted initiative developed to address social determinants of health and create a model to revitalize neighborhoods. This initiative

addresses social determinants of health and supports long-term neighborhood health and growth in Toledo's UpTown Neighborhood. The revitalization initiative focuses on four areas: improving health outcomes, increasing access to education, offering job training, and providing stable housing.

- **Metropolitan Housing Authority of Toledo** provides affordable housing to adults, seniors and children in its Affordable Housing and Housing Choice Voucher Program. Serving Lucas County and the City of Toledo, they also provide a myriad of programs and opportunities designed to improve the total quality of life for their residents, with the Family Self-Sufficiency Program, and employment training through Workforce Development. The programs and services are the result of successful collaborations with numerous community partners.
- **Toledo Lucas County Port Authority** provides funding that facilitates neighborhood redevelopment through strategies such as energy efficiency building retrofits and small business/microenterprises development. The Port Authority has an Economic and Community Development Institute (EDCI) grant and loan program funded from the property taxes which supports real estate projects by eligible, 501 (c) 3 neighborhood-based organizations. The EDCI program also provides business training, technical assistance, and loans of up to \$350,000 to start-up and expansion businesses and microenterprises for equipment purchases, operating expenses, and working capital. Among its programs, the EDCI provides Brownfield Redevelopment, Tax Increment Financing, (TIF) and bond financing to aid neighborhood redevelopment goals such as those envisioned for the two NRSAs. EDCI promotes greater economic opportunities through loans and guarantees tied to the number of jobs created or retained and leveraging of Small Business Administration (SBA) 504 Loan Program funds.
- **Toledo Area Regional Transit Authority (TARTA)** provides a vital link in the Toledo metro area to jobs, education, health care, and other destinations. Enabling everyone in the community to have access to transportation regardless of their age, race, physical ability, or economic background. TARTA serves seven communities in Northwest Ohio: Maumee, Ottawa Hills, Rossford, Sylvania, Sylvania Township, Toledo, and Waterville.
- **Diocese of Toledo** was established in 1910. It encompasses 8,222 square miles in a mixture of urban and rural areas that spans 19 counties in Northwest Ohio. Their churches, schools, hospitals, and other institutions provide health, education, and spiritual care for communities in need which include the two NRSAs.
- **Toledo Public Schools** are on a mission to produce competitive college and career-ready graduates through a rigorous curriculum across all grade levels by implementing Ohio's New Learning Standards with fidelity. Their vision is to be an 'A-rated' school district whose graduates are college and career ready. There are 9 schools within the two NRSAs: one Primary, six Elementary, one Middle School, and one K-6 school.
- **Ohio Housing Finance Agency (OHFA)** provides opportunities for Ohioans to locate affordable housing. The Agency offers a variety of programs to help first-time homebuyers, renters, senior citizens, and others find quality affordable housing that meets their needs. The Agency also works with developers and property managers of affordable housing throughout the state.

XV. Current Leveraged Resources in NRSAs

The intent of the NRSA strategy is to attract non-CDBG public and private sector resources to the target area. There are several current and future projects and programs that the City's NRSA investment will leverage. These include government initiatives, capital improvements, foundation-funded programs, and private investment. This section identifies some of the current key non-federal governmental and private sector funding and projects in the two NRSAs that will benefit low-to-moderate-income individuals and households.

The amount of federal funding is unable to address the housing and community development needs of the two proposed NRSAs. The City of Toledo has proactively sought out other public and private sector partnerships and resources to expand the impact of its grant-funded activities. The table below labeled *Leveraged Resources and Intended Outputs* identifies initiatives and intended outputs based on the area (City Wide and NRSAs) that the City intends to leverage within the two NRSAs.

- **Historic Tax Credits**

The federal historic rehabilitation tax credit (HTC) program is an indirect federal subsidy to finance the rehabilitation of historic buildings with a 20 percent tax credit for qualified expenditures. Before the enactment of tax reform legislation at the end of 2017, there was also a 10 percent non-historic rehabilitation tax credit for pre-1936 buildings. These Federal tax incentives are used to stimulate private investment in the rehabilitation and reuse of historic structures that can provide affordable rental housing.

- **The Ohio Low-Income Housing Tax Credit Program (LIHTC)**

The Low-Income Housing Tax Credit (LIHTC) Program is an investment vehicle created by the federal Tax Reform Act of 1986 to increase and preserve affordable rental housing for low-to-moderate-income households. Administered in Ohio by the Ohio Housing Finance Agency (OHFA), this program permits investors in affordable rental housing to potentially claim a credit against their tax liability annually for a period of 10 years, bringing much-needed private investment to affordable housing projects. The City provides funding for projects receiving low-income housing tax credits from OHFA. This consists of HOME-assisted projects receiving 9% competitive tax credits and a non-competitive allocation of 4% credits. See link to OHFA: [Ohio Housing Finance Agency Tax Credits](#).

Over the past four years, only two housing projects located in the City of Toledo received 9% competitive LIHTC allocations namely:

1. Warren Commons – 46 service-enriched housing units - \$3,050,000 in tax credits and HDL reserves.
2. Secor Senior Lofts – 58 new senior affordable urban housing - \$2,250,000 in tax credits and HDL reserves.

- **Toledo Neighborhood Capacity Building Institute (TNCBI)**

Toledo lacks strong neighborhood organizations with the capacity to plan and implement community development projects and sustained activities that enhance neighborhoods and improve quality of life. The TNCBI is a 12-month engagement of select nonprofit organizations, neighborhood

associations and community leadership to build capacity in strategic areas necessary for effective neighborhood revitalization and sustainability. To carry out the NRSA plan, the COT can use an implementing entity such as a non-profit community-based organization or a working group of community stakeholders. The TNCBI will provide a forum to train community leaders in both NRSAs to implement the NRSA strategy. The course consists of 21 modules with virtual and small group sessions and graduation and recognition by city leadership. Modules include fundraising/grant writing, programming and services, strategic planning, housing and commercial development basics, land use basics, and understanding community power systems. The institute will result in stronger neighborhood organizations, increased access to investments, and enhanced quality of life.

- **Broadway Infrastructure Improvements**

In partnership with the Broadway Coalition, and the Toledo Design Collaborative, the COT approved \$7.8 million in infrastructure improvements along the Broadway corridor in the Od South End NRSA. Small business loans, signage, streetscape, and business façade improvements will build on the infrastructure upgrades. The project is multi-year and started with a \$150,000 gateway arch project.

- **Vibrancy Initiative**

The City launched a “vibrancy initiative” in October 2021 to improve commercial buildings and create job-ready spaces in low- to moderate-income census tracts where entrepreneurs can occupy revitalized buildings and strengthen neighborhoods as more goods and services are available nearby. Additionally, it will preserve structures and reduce blight as boarded-up buildings are proactively repaired and reopened. The initiative is intended to spur investment and job creation in the City in general and specifically in the two proposed NRSAs:

1. Facade Improvement Grant (FIG) - a matching grant of \$10,000 to \$40,000 to reimburse eligible expenses for property owners to transform the facade of commercial, industrial, and mixed-use buildings in low- to moderate-income census tracts. Building owners must provide a 50% match and must either occupy the space as a business owner or market the space for lease.
2. White Box Grant Pilot Program- a matching grant of \$25,000 to \$50,000 for first-floor, interior renovation expenses to bring vacant commercial first-floor spaces, in low- to moderate-income census tracts, up to current code to create a functional "white box" space ready for customization and occupancy. Building owners are required to provide a 30% match and must either occupy the space as a business owner or actively market the space for lease.

- **Englewood Code Compliance Pilot**

The City, in conjunction with the Code Compliance Division, will be working with homeowners to abate code violations. In doing so, the effort will remove blight, stabilize property values, and overall improve the housing stock within the City. The City has identified 767 roof violations throughout the City, with 79% of the violations being in the NRSA areas. Through the “Rooftops” initiative, the City will provide grants to eligible property owners of identified roof code violations. While eligibility is based on being at or below 60% of the area median income, priority will be given to seniors, veterans, and disabled homeowners. The program is made available through the \$900,000 ARPA funding allocation and financial institution partnerships.

- **Toledo Healthy Homes Training Center**

A new initiative for the Englewood NRSA is the collaborative \$2 million application to the Department of Energy along with the \$2m Federal Earmark application for the Toledo Healthy Homes Training Center Workforce Development project. The City of Toledo is in the process of undertaking an urban design study to reposition the distressed Swayne Field Shopping Center and surrounding parcels. The Toledo Healthy Homes Training Center in the Englewood NRSA will provide a regional hub for workforce development training opportunities across impacted communities. This project will recruit, train and mentor a diverse workforce while providing the resources for participant supportive services such as stipends and transportation vouchers. The THHTC will offer 65 weatherization technicians and 70 lead worker trainees an entryway to the broader clean energy job market and expand the WAP workforce capacity across northern Ohio.

- **Section 108 Loan Guarantee Program – Loan Pool Project**

The City of Toledo has received a \$37 million loan guarantee for the Loan Pool Project to spur equitable community development, create jobs, and increase affordable housing. The Loan Pool funding will provide gap financing for borrowers with the intent to create and retain jobs, increase affordable housing, advance equity, and equitable development opportunities while expanding the existing tax base for Toledo. Equitable development projects will include projects that support investments in communities and neighborhoods of color or provide financing to Black, Indigenous, and People of Color (BIPOC) led developers, businesses, or organizations.

The Section 108 Loan Pool is anticipated to utilize the following four potential eligible activities with the following Good Faith Allocations:

Activities	Allocation	NRSAs	Citywide
Special Economic Development	\$20,000,000	\$4,000,000	\$16,000,000
Acquisition of Real Property	\$2,000,000	\$1,000,000	\$1,000,000
Housing Rehabilitation	\$10,000,000	\$5,000,000	\$5,000,000
Public Facilities	\$5,000,000	\$3,000,000	\$2,000,000
TOTAL	\$37,000,000	\$13,000,000	\$24,000,000

- **Driggs Dairy South**

The Driggs Dairy South project is located within the Englewood NRSA entailing 1.85 acres of an abandoned commercial site. The scope of the project includes the acquisition of land, demolition, clean-up of the site, and the development of 53 new units of affordable housing. The Driggs Dairy South project would be a joint venture with various funding sources including 4% low-income housing tax credit funds, ARPA funds, city and county funds, and private for-profit developers.

Agency or Organization	Project Description(s)	Project Type(s)	Investment \$	Period	Outputs	NRSA Location	Website, if applicable
Private Investment Projects							
Toledo Local Initiatives Support Corporation	Investments in early win projects in commercial gateways	Commercial corridor, job creation, small business	\$100,000	2022-2026	Projects to be selected	Old South End -NRSA#1	Toledo LISC Toledo
	Three LIHTC single-family rental projects converted Vacant homes repaired Financial Opportunity Center	Homeownership and rental Homeownership Housing, financial counseling	\$2.1m \$2.5m	2022-2026	33 homeowner units & 67 rental 25 units	Englewood – NRSA#2	Toledo LISC Toledo
Key Bank & NeighborWorks Toledo (NHS)	Key Bank providing an EQ2 long-term (20-year) deeply subordinated loan to NHS Toledo for mortgages to LMI 1st-time homebuyers.	Homeownership Housing preservation	\$3,000,000	2022-2026	New housing units Increased value	Available for South Toledo Targeted to both NRSAs	
Historic South Initiative (HSI) affordable housing	HOME CHDO developing 120 new housing units for seniors and preservation of owner-occupied S/F units	Rental housing Home repair Homebuyer	\$1,700,000 tax credits, grants, loans \$1.5m HOME	2022-2026	Increased senior housing. Preserve existing houses	Old South End -NRSA#1	Historic South
Columbia Gas	Energy improvement & weatherization grants for LMI households for homeownership only	Homeownership	\$1.5 million	2022-2026	Homebuyer housing Increased value	Citywide and two NRSAs	Columbia Gas of Ohio (columbiagasohio.com)

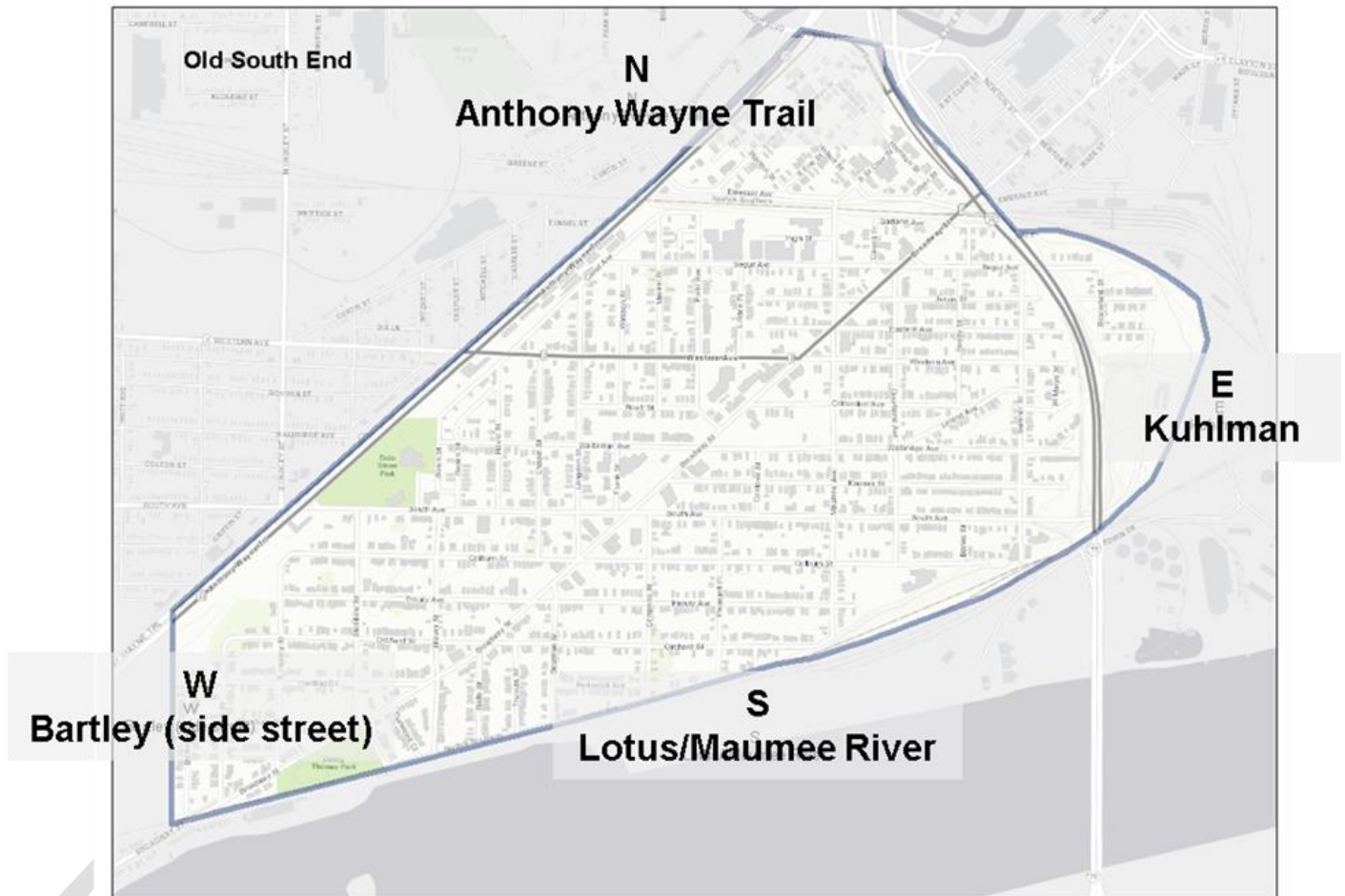
Agency or Organization	Project Description(s)	Project Type(s)	Investment \$	Period	Outputs	NRSA Location	Website, if applicable
First Energy & Toledo Edison	Energy improvement & weatherization grants for LMI households	Rental housing Homeownership	\$2.6 million	2022-2026	Homebuyer & rental housing Improvements	Citywide and two NRSA	FirstEnergy Corp. Home
City Government Projects							
Code Enforcement Division, Dept. of Housing and Community Development	Code enforcement and demolition of unsafe structures. Homeowner education and outreach on code compliance.	Demolition on area and spot basis	\$1,250,000	2022-2026	Blight reduction & community improvements Code education & home repair	Citywide and two NRSA	Toledo Code Enforcement (oh.gov)
Dept. of Economic Development Vibrancy Initiative	Program grants to businesses and commercial property owners	Façade upgrades, bight reduction Business spaces and job creation	\$250,000	2022-2026	New business spaces, job creation, quality of life	Old South End -NRSA#1 Englewood – NRSA#2	City of Toledo Vibrancy Initiative (oh.gov)
City of Toledo and State of Toledo	Improvements to the Broadway Corridor including physical and quality of life improvements	Infrastructure upgrades, small business development	\$7,800,000	2022-2026	Improved streets, and sidewalks, increase services & jobs	Old South End -NRSA#1	
Department of Housing and Community Development: Driggs Dairy site	Redevelop an abandoned commercial site through demolition, clean up, and conversion into housing and commercial uses.	Demolition, affordable housing, and job creation	\$14,400,000	2022-2026	53 new housing units Grocery store	Englewood - NRSA#2	Toledo - Former Driggs Dairy Reuse Phase I... (oh.gov)

Agency or Organization	Project Description(s)	Project Type(s)	Investment \$	Period	Outputs	NRSA Location	Website, if applicable
Toledo Pilot Neighborhood Capacity Building Institute (TNCBI)	12-month training program - nonprofits, neighborhood associations & community leaders to build capacity.	Public services and education	\$500,000	2022-2026	Trained & capable community leaders	Citywide but focus on the two NRSAs	Toledo Neighborhood Capacity Building
Toledo Dept. of Parks	Application for funding for phase 3 of Danny Thomas Park improvements	Park improvements	\$1.75 - 2 million	2022-2026	Improved living environment	Old South End -NRSA#1	
Land Bank	Substantial rehab and sell 6 single family homes in Englewood.	Home Repair, Homeownership	\$1.5m	2022-2026	Improved Housing Stock, Homeowners	Englewood	
THHTC (Swayne Field Workforce Dev)	Acquire and renovate facility, provide workforce training.	Workforce Development	\$4m	2022-2026	Jobs	Englewood	
Other Government Projects							
State of Ohio Dept of Energy & HHS	Energy improvement grants for LMI households.	Rental housing Homeownership	\$1.5 million	2022-2026	Homebuyer & rental housing	Citywide and two NRSAs	
Toledo Lucas County Port Authority	Energy efficiency and alternative energy programs ECDII Small Business Loans.	Energy improvements Business assist.	\$1 million	2022-2026	Increase in economic opportunities	Citywide and two NRSAs	
HUD Section 108 Loan Guarantee	Gap financing for projects to create and retain jobs, increase affordable housing, development opportunities in BIPOC communities.	Economic Dev., Affordable Housing, Infrastructure	\$37 million	2022-2026	Increase in economic opportunities and affordable housing	Citywide and two NRSAs	

XVI. Appendices

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Attachment A: NRSA #1 - Old South End Boundary Map



Attachment B: Old South End Master Plan



OLD SOUTH END MASTER PLAN

FOR THE BROADWAY CORRIDOR COALITION - TOLEDO, OHIO

FEBRUARY 27, 2017

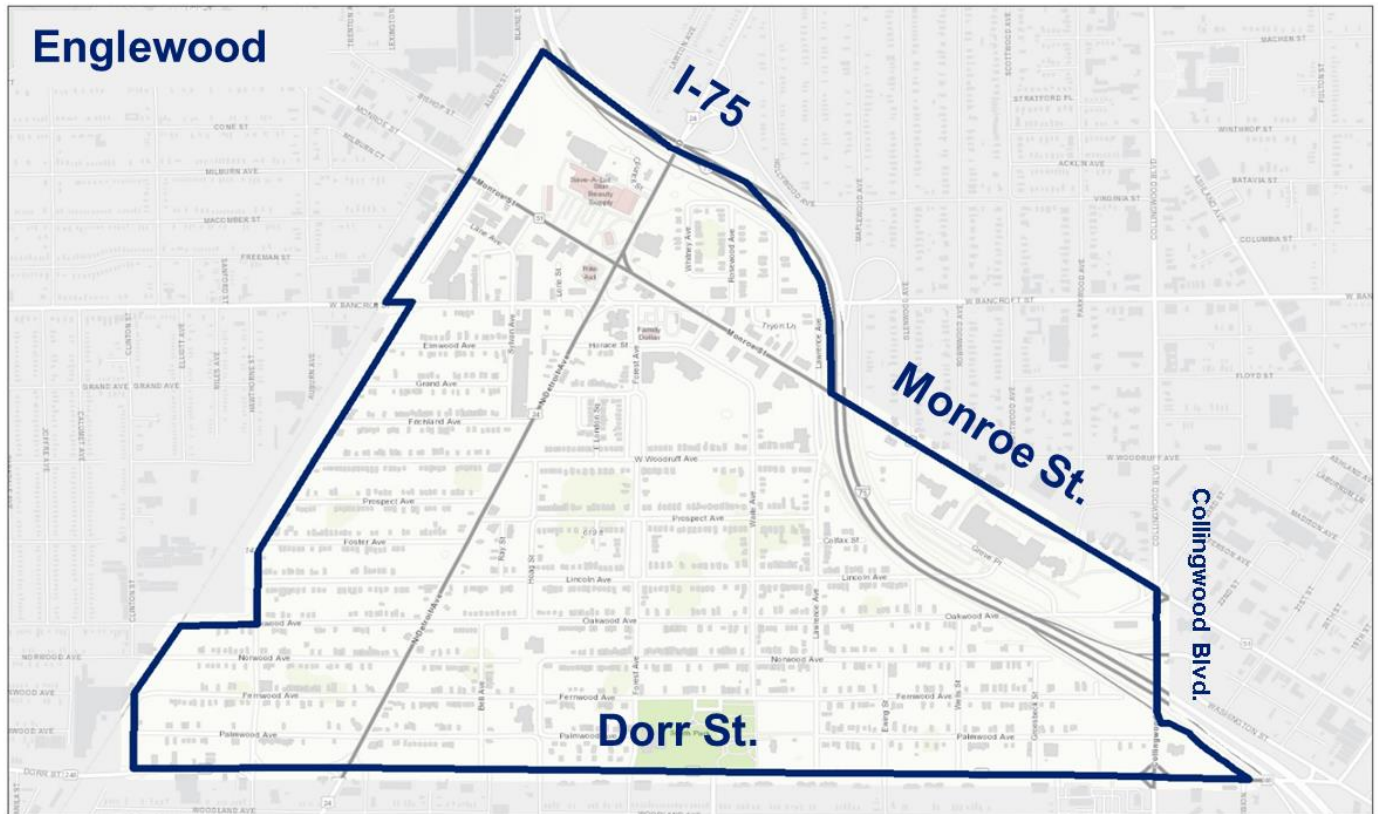
TOLEDO
DESIGN
CENTER



Please click on the link below for the full document.

<https://toledodesigncollective.s3.amazonaws.com/2017-OldSouthEnd-MasterPlan.pdf>

Attachment C: NRSA #2 - Englewood Boundary Map



Attachment D: Englewood Community Plan



Please click on the link below for the full document.

<https://toledodesigncollective.s3.amazonaws.com/2022.07.13.Englewood-Master-Plan-FINAL-spreads.pdf>

Attachment E: NRSA Demographic and Primarily Residential Criteria

Demographic Criteria: Per HUD Notice CPD-16-16, The Designated Area(s) Must Be Documented as Primarily residential and contain a percentage of low- and moderate-income residents that is equal to a community's "highest quartile percentage" (as computed by HUD pursuant to 24 CFR 570.208(a)(1)(ii)) or 70 percent, whichever is less, but, in any event, not less than 51 percent. The city's highest quartile percentage is over 70% LMI; so, 70% LMI was used to determine the LMI eligibility. The following are the calculations for the NRSA #1 - Old South End and NRSA #2 – Englewood:

Low-to-Moderate-Income Demographic Criteria By NRSA: Old South End - NRSA #1

Old South End – NRSA #1			
Block Groups	LOWMOD	LOWMODUNIV	LOWMOD_PCT
390950103001	670	830	81%
390950054004	255	280	91%
390950054001	590	1,030	57%
390950054002	165	250	66%
390950103002	385	610	63%
390950103003	575	785	73%
390950042003	420	530	79%
390950042002	270	335	81%
390950042001	475	595	80%
390950054003	1,035	1,220	85%
AREA AVERAGE	4,840	6,465	75%

Low-to-Moderate-Income Demographic Criteria By NRSA: Englewood - NRSA #2

Englewood- NRSA #2			
Block Groups	LOWMOD	LOWMODUNIV	LOWMOD_PCT
390950014002	360	450	80%
390950015001	500	650	77%
390950015002	490	685	72%
390950021002	705	1,000	71%
390950024002	390	480	81%
390950025001	415	555	75%
390950025002	1,260	1,365	92%
390950026002	210	435	48%
390950026001	435	625	70%
390950034001	750	855	88%
AREA AVERAGE	5,515	7,100	78%

Primarily Residential By NRSA: The primarily residential criteria was calculated by taking the total number of parcels and dividing by number of residential parcels (not including vacant parcels). Below is the breakdown for each of the NRSAs.

Old South End - NRSA #1	Englewood - NRSA #2
3210 Parcels	2497 Parcels
2818 Res (2320 w/o vacant)	537 (47 com 490 res) vacant
377 Com	389 com
547 Vacant (498 res, 49 com)	2105 res
= 72%	= 65%

Attachment F: NRSA Public Notices and Public Comments

See attached and below copies of public notices, and comments received.

Public Comments and Feedback

For the Englewood area there was ProMedica, Hospital Systems. It was a landbank of Toledo focus area, Local Initiative Support Corporation, Toledo office. For the South End stake holders such as The Arts Commission, Toledo Local County Port Authority, Toledo Land Bank focus area and the Diocese of Toledo were partners already working in that neighborhood. Both the City of Toledo and other stakeholders and partners were carrying out investments' activities in that target area.

Residents and stakeholders were eager to provide feedback. While some of the respondents understood the need to target investment to realize significant change, others were concerned that the NRSA's would omit certain areas. Residents also identified several areas within their neighborhoods that they wished to be included. However, residents were advised that the inclusion of areas would be subject to meeting the NRSA LMI population requirements. In addition, residents wanted to make sure that targeted investments were coordinated with other activities. The final comments received during the public comment period will be reviewed and incorporated into the final NRSA strategy.

Attachment G: Current Community Investment by NRSA**Current Stakeholder Investments By NRSA: Old South End - NRSA #1**

- City funds for home repair, \$650,000.
- City investments in housing preservation, strategic demolition and greenspace totaling \$300,000 in 2019-2021 (Source: FY2020-2021 Annual Action Plan).
- Land Bank investments in home repair (\$362,000) and demolitions (\$3.26 million).
- Historic South Initiative (HSI) investments - Carnegie Library renovations - \$300K & Danny Thomas Park - \$400K; 2019-2021 lead abatement and house rehab - \$300K– State of Ohio grants. Seven rehabs - \$655K – Total investment - \$6MM.
- HOME CHDO funding - \$250,000.
- Investments in infrastructure: \$750,000. Park Improvements including Danny Thomas Park (\$1.6 million); Nicholson Park; Ashley Park (\$88,000); 4 park signs (\$11,000).
- Toledo LISC invested \$150,000 in the Old South End.

Current Stakeholder Investments By NRSA: Englewood - NRSA #2

- City improvements to two parks, totaling \$937,350 (Highland Park-\$917,830, Robinson Park-\$8,000, park signs-\$11,520; construction of new branch library - \$9 million.
- City funds for home repair, \$321,080 for 2018-2021.
- Public Services, totaling \$180,000 (LED Streetlight conversion, \$120,000, Park Improvements-\$35,000, and street paving (mill/fill) \$25,000.
- LISC Toledo has invested \$4,101,999 includes \$547,638 in 2020 for housing, small business, workforce development and financial counseling (Financial Opportunity Center), and capacity building.
- Demolitions investments from the City and the Land Bank totaling over \$1.6m.

Attachment H: Documenting Impact

Old South End -NRSA #1

	Goals to Address Aggregate Root Cause (Why)	Strategy Buckets (How Part)	Beneficiaries/Partners (Who)	Outcomes (Progress/Impact)
Affordable Housing	Build units of affordable housing to increase the supply of adequate housing for seniors	<ul style="list-style-type: none"> • Real Estate development • Local and National developer partnership • Use community-based development organization (CBDO) for CDBG funding 	<ul style="list-style-type: none"> • CBDOS • Seniors 	<ul style="list-style-type: none"> • Increase affordable housing • Create model for co-developers • Increase use of CDBG funds for new construction • Create opportunities for funder partnerships
	Repair owner-occupied single-family houses to improve the quality of affordable housing stock	<ul style="list-style-type: none"> • Establish hope repair loan program • Specialty repair programs I.e., disability retrofits, lead, elderly, emergency repairs 	<ul style="list-style-type: none"> • CBDOS • Homeowners (at least 51% LMI) • Special needs population 	<ul style="list-style-type: none"> • Create opportunities for partnerships with funders • Improved affordable housing • Mix of incomes served • Special needs housing • Elderly to remain in their homes
	Acquire & rehabilitate vacant properties for homebuying & rental	<ul style="list-style-type: none"> • Use of tax foreclosed and Bank REO properties • Redevelop new housing • Use of CBDOS • Partner with land bank and public housing authority 	<ul style="list-style-type: none"> • CBDOS • Large and small families • Toledo Land Bank 	<ul style="list-style-type: none"> • Create opportunities for partnerships with funders • Add to affordable housing stock • Mix of incomes served
	Convert tax credits S/F rentals into homeowner units	Partner with NHS entity	<ul style="list-style-type: none"> • Large and small families 	<ul style="list-style-type: none"> • Increased homeownership

	Goals to Address Aggregate Root Cause (Why)	Strategy Buckets (How Part)	Beneficiaries/Partners (Who)	Outcomes (Progress/Impact)
Economic and Development	Create/retain jobs through assistance to small businesses/microenterprises	<ul style="list-style-type: none"> • Create program design • Market job creation program to existing & new businesses 	<ul style="list-style-type: none"> • Small businesses & microenterprises • Unemployed residents 	<ul style="list-style-type: none"> • Eliminate need for businesses to track income & reduce paperwork • Reduce business eligibility requirements by waiving public benefit standards • Expanded economic base
	Support Broadway Business District in Old South End NRSA #1	<ul style="list-style-type: none"> • Outreach to M/W/DBEs • Technical & financial assistance • Survey M/W/DBEs needs • Business district support • Creation of business space 	<ul style="list-style-type: none"> • Business district • Small businesses & microenterprises • M/W/DBEs 	<ul style="list-style-type: none"> • Improved business district • Increased M/W/DBE opportunities • Attraction of employers • Expanded economic base • Diversity, equity, & inclusion (DEI)
Neighborhood Improvements	Improve infrastructure by \$7.8m in funding	<ul style="list-style-type: none"> • Identify and budget • Leverage with CDBG funds 	<ul style="list-style-type: none"> • Residents • Contractors • M/W/DBEs 	<ul style="list-style-type: none"> • Improved neighborhood conditions • Expanded economic base
	Demolitions of unsafe structures and code enforcement	<ul style="list-style-type: none"> • Identify properties • Code enforcement inspections 	<ul style="list-style-type: none"> • Property Owners • Residents • Land Bank • M/W/DBEs 	<ul style="list-style-type: none"> • Improved neighborhood conditions • Expanded economic base
	Increase in public services to support the NRSA strategies	<ul style="list-style-type: none"> • Assess existing capacity of social services • Benefit from 15% public service waiver for NRSA 	<ul style="list-style-type: none"> • Renters • Homeowners • Social Service Providers 	<ul style="list-style-type: none"> • Increased neighborhood capacity • Implementation of NRSA strategies

Englewood – NRSA - #2

	Goals to Address Aggregate Root Cause (Why)	Strategy Buckets (How Part)	Beneficiaries/Partners (Who)	Outcomes (Progress/Impact)
Affordable Housing	Build affordable housing units to increase the supply of adequate housing for residents	<ul style="list-style-type: none"> • Redevelopment of Driggs Dairy Site – industrial re-use • Local and National developer partnership 	<ul style="list-style-type: none"> • Private for-profit developers • LISC 	<ul style="list-style-type: none"> • Increase affordable housing • Create opportunities for funder partnerships
	Repair owner-occupied single-family houses to improve the quality of affordable housing stock	<ul style="list-style-type: none"> • Establish home repair loan program • Specialty repair programs I.e., disability retrofits, lead, elderly, emergency repairs 	<ul style="list-style-type: none"> • Homeowners (at least 51% LMI) • Special needs population 	<ul style="list-style-type: none"> • Create opportunities for partnerships with funders • Improved affordable housing • Mix of incomes served • Special needs housing • Elderly to remain in their homes
	Acquire & rehabilitate vacant properties for homebuying & rental	<ul style="list-style-type: none"> • Use of tax foreclosed and Bank REO properties • Redevelop new housing • Use of CBDs • Partner with land bank and public housing authority 	<ul style="list-style-type: none"> • Large and small families • Toledo Land Bank 	<ul style="list-style-type: none"> • Create opportunities for partnerships with funders • Add to affordable housing stock • Mix of incomes served
	Convert tax credits S/F rentals into homeowner units	<ul style="list-style-type: none"> • Partner with NHS entity • Provide down payment & closing cost assistance 	<ul style="list-style-type: none"> • Large and small families • NHS affiliate 	<ul style="list-style-type: none"> • Increased homeownership • Create opportunities for partnerships with funders • Improved affordable housing • Mix of incomes served

	Goals to Address Aggregate Root Cause (Why)	Strategy Buckets (How Part)	Beneficiaries/Partners (Who)	Outcomes (Progress/Impact)
Economic and Development	Create or retain jobs through financial assistance to small businesses/microenterprises in the NRSA	<ul style="list-style-type: none"> • Create program design • Market job creation program to existing & new businesses 	<ul style="list-style-type: none"> • Small businesses & microenterprises • Unemployed residents 	<ul style="list-style-type: none"> • Eliminate need for businesses to track income & reduce paperwork • Reduce business eligibility requirements by waiving public benefit standards • Expanded economic base
	Develop Healthy Food Initiative	<ul style="list-style-type: none"> • Identify site • Conduct feasible study • Identify potential partners and financing sources 	<ul style="list-style-type: none"> • Residents 	<ul style="list-style-type: none"> • Improved access to healthy food • Diversity, equity, & inclusion (DEI)
	Increase workforce development services in the NRSA	<ul style="list-style-type: none"> • Peer agency partnerships to provide workforce support • Tap into 4-county workforce program 	<ul style="list-style-type: none"> • Unemployed residents • Workforce agencies 	<ul style="list-style-type: none"> • Increase in resident readiness to take advantage of jobs/contracts
Neighborhood Improvements	Demolition of unsafe structures and code enforcement	<ul style="list-style-type: none"> • Code enforcement and Receivership Pilot • Identify properties • Code enforcement inspections 	<ul style="list-style-type: none"> • Property owners • Residents • Land Bank • M/W/DBEs 	<ul style="list-style-type: none"> • Improved neighborhood conditions • Expanded economic base
	Increase in public services to support the NRSA strategies	<ul style="list-style-type: none"> • Assess existing capacity of social services • Code enforcement inspections 	<ul style="list-style-type: none"> • Renters • Homeowners • Social service providers 	<ul style="list-style-type: none"> • Improved neighborhood conditions • Expanded economic base

Attachment I: NRSA Management Structure Organizational Chart

Department of Housing & Community Development - Org Chart

5/24/22

