



CITY OF NEWBURGH

CONSOLIDATED HOUSING AND
COMMUNITY DEVELOPMENT ACTION PLAN
AND
COMMUNITY DEVELOPMENT BLOCK
GRANT APPLICATION

FISCAL YEAR 2011

City Council

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A. Introduction / Executive Summary

The mission of the US Department of Housing and Urban Development Community Development Block Grant Program is to generate anti-poverty initiatives among the Nation's poorest communities. The City of Newburgh has been identified as an entitlement community and is the recipient of an annual allocation of these designated funds. 2011 represents the second year of the five year action plan which addresses three goals established by federal statute for these programs: providing decent housing; providing a suitable living environment; and providing expanded economic opportunities. These programs are primarily aimed to benefit families and individuals of low to moderate income.

The Consolidated Plan, as required by HUD, is an important policy document. It sets forth both housing and community development needs and establishes priorities and strategies for meeting these needs, consistent with available funding sources. Each of the following years' Annual Action Plan should be consistent with the goals represented within that plan.

Community Development needs of the City of Newburgh include four broad categories:

- Rehabilitation of Private Property
- Economic Development/Job Creation
- Infrastructure Improvements;
- Public Services.

The City of Newburgh One Year Action Plan for 2011 proposes to use \$860,000 of CDBG Entitlement funds and \$50,000 in program income to undertake 2011 activities. The City of Newburgh will also reallocate funding from 2009 totaling \$459,587- as a part of the 2011 budget. 84,955 of unallocated 2010 funds will also be appropriated for the use of the 2011 budget. The consolidation of these funds provides a total of \$1,454,542 to the City of Newburgh for its community development efforts. Funds will be spent on housing and community development activities including rehabilitation of owner occupied and rental property, clearance, development, façade improvement activities, and sidewalk/ street improvements. Most activities will be carried out in the Lander St. primary target area and Census tracts 4 & 5 as a secondary target area. It is estimated that 70% or more of the CDBG funds will be directed to the primary and secondary target areas through programs and projects aimed toward the provision of decent housing, the provision of a suitable living environment and the expansion of economic opportunities. Some activities will serve residents City-wide.

The priority of the 2011 Action Plan is to address housing issues within the City of Newburgh especially within the targeted area. The proposal for 2011 utilizes both CDBG funds and generated program income. This plan does not address the reprogramming of recently received Section 108 funds or identified KNEC program income. Planning efforts are currently underway to establish a comprehensive plan for those identified funds and separate public review and HUD review will take place as those funds are allocated. The ultimate goal of reprogramming the Section 108 and KNEC funds is to leverage the income from these programs to address workforce development and comprehensive neighborhood stabilization.

MEETING OBJECTIVES

The City of Newburgh realizes that CDBG funding is a limited resource and as such the targeted approach was identified as a priority. Additionally, the following objectives were identified as priority issues to be addressed within the neighborhoods during this five year plan.

Objectives identified in the Five Year Strategy are summarized as follows:

1. Provide property rehabilitation assistance.
2. Provide opportunities for additional ownership and rental housing.
3. Expand the supply of affordable housing in good condition that meets the needs of the City's diverse households and family structures, and income levels.
4. Upgrade the physical condition of targeted areas and City as a whole; create and retain jobs, and provide housing opportunities close to employment opportunities.
5. Maintain, repair and upgrade infrastructure to support revitalization and rehabilitation.
6. Provide limited resources to public and non-profit organizations that provide services to low income households.
7. End chronic homelessness and move families and individuals to permanent housing and eliminate homelessness due to housing market conditions by stabilizing housing tenure through financial and policy supports.
8. Expand crisis supports to meet the needs of homeless households and those potentially facing homelessness.
9. Reduce the number of families living in poverty.
10. Reduce lead based paint hazards in the City
11. Subsidize rental assistance through non-profit agencies for the HIV/AIDS population in Orange County.
12. Enhance opportunities for housing and support services for special needs populations.
13. Continue to identify and address major impediments to the creation of affordable housing at the local level.

Overall the City's aim is to achieve an outcome of improved opportunities, adequate housing and infrastructure, and the provision of job training services workforce for development for the areas of the City that have the greatest needs.

TARGET APPROACH

Major initiatives are geographically defined and include the Lander Street area as a primary target area and Census tracts 4 and 5 as secondary target areas. Hence, new projects in the Lander Street area will be given priority treatment. Past progress has occurred throughout the City without geographic foci due to the common needs that exist throughout the City. It is estimated that 70% or more of the City's CDBG funds will be directed to the primary target and secondary target areas through programs and projects aimed towards the provision of decent housing, the provision of a suitable living environment and expansion of economic opportunities. Some activities may serve residents City-wide.

Summary of Activities

<u>Proposed Budget/Requests</u>	
Administration	\$ 170,866
In Rem Stabilization Program	\$ 153,676
Rental Housing Activities	\$ 165,000
Housing Counseling Services	\$ 100,000
A Brush With Kindness	\$ 50,000
Housing Rehabilitation	\$ 200,000
Demolition	\$ 50,000
Sidewalk/ Street Improvement Projects	\$ 350,000
Small Business Rental Subsidy	\$ 30,000
Small Business Loans	\$ 50,000
Youth Violence Reduction/ Promising Neighborhoods Program	\$ 50,000
Section 108 Repayment	\$ 85,000
Total Funding Requests	\$ 1,454,542

FY 2011 funding will support the following objectives:

Project: **Administration**
Budget: **\$170,866**
Summary: The City has allocated funds to support the partial salaries of the Planning & Development Director, Office Manager and the full time salary of the Community Development Director. Also included are office supplies, training, and annual audit. Planning efforts for 2012 will be conducted with the CDBG Advisory Committee.

Project: **In-Rem Stabilization Program**
Budget: **\$153,676**
Summary: Over the last two years, the City of Newburgh has acquired nearly 200 properties through tax foreclosure proceedings. To prevent the abandonment of this housing in primarily low income neighborhoods, CDBG funds will be utilized to make essential repairs and cover the operating expenses to stabilize the buildings and keep tenants within the properties where possible

Project: **Rental Housing Activities**
Budget: **\$165,000**
Summary: Assist in the production of new quality rental units and provide assistance in the form of loans, grants, loan guarantees, interest subsidies and other

forms of assistance for rental housing rehabilitation projects including health and safety, energy efficiency improvements, etc.

Project: **Housing Counseling Services**

Budget: **\$100,000**

Summary: Provide homeowner education and foreclosure prevention counseling to City of Newburgh residents, including 1:1 counseling and seminars. The City will fund assistance programs within Census tracts 4 & 5 for those who complete education programs, and other identified program requirements. Recipients will also be connected to other CDBG funding activities for rehabilitation assistance and workforce development.

Project: **A Brush With Kindness**

Budget: **\$50,000**

Summary: Neighborhood exterior home preservation program that provides minimal repairs to home exteriors including painting and weatherization to homeowners in need.

Project: **Demolition**

Budget: **\$50,000**

Summary: City of Newburgh will issue an RFP seeking demolition services to mitigate unsafe buildings within Census tracts 4 & 5.

Project: **Housing Rehabilitation**

Budget: **\$200,000**

Summary: Funding for staff as well as programs to support health and safety, energy efficiency, and lead mitigation programs. 70% of efforts within targeted area.

Project: **Sidewalk/ Street Improvement Project**

Budget: **\$350,000**

Summary: The City will undertake selected improvements in targeted areas to address quality of life and safety issues. The impact of this project has the potential to address neighborhood revitalization and workforce goals.

Project: **Small Business Rental Subsidy**

Budget: **\$30,000**

Summary: The New Business Retail Rental Subsidy Grant is an initiative to attract street level retail by underwriting the monthly rental in conjunction with the property owner for up to three years. The property owner will reduce the monthly square footage by a certain dollar amount and the City will match that up to \$3.00 per square foot for a maximum of 1,000 square feet for the first year. The City's contribution would decline by 1/3 the

second and third years. The City will focus on the Liberty Street Commercial Corridor from Broadway to Renwick St.

Project: **Small Business Loan Fund**
Budget: **\$50,000**
Summary: This loan fund will provide financial support to small businesses in the City of Newburgh. Loans are made up to a maximum amount of \$10,000.

Project: **Youth Violence Reduction/ Promising Neighborhoods**
Budget: **\$50,000**
Summary: This funding is to support service programming for at-risk city youth with providers being selected by a request for proposals from community based organizations. Focus on best practices to reduce youth violence, including workforce development.

Project: **Section 108 Repayment**
Budget: **\$85,000**
Summary: Repayment of interest of the Crystal Lake Section 108 loan. Currently, principal payments are made through a portion of previously received section 108 repayments. A portion of these funds is currently restricted and will be programmed in the future for CDBG eligible activities.

B. Evaluation of Past Performance

The Department of Housing and Urban Development (HUD) routinely monitors and audits grantees. A HUD audit report was issued for the City of Newburgh on February 24, 2009. The HUD audit identified administrative improvements needed on the part of the City to effectively, efficiently and economically carry out activities in compliance with HUD regulations. In response, the City has developed timesheets and has implemented procedures and controls to ensure that all transactions charged to the CDBG program are in compliance with HUD regulations.

HUD identified other specific expenditures that required clarification or additional documentation. The City is continuing to work with HUD to address issues raised during the audit. The City will enhance its record-keeping process for all activities to ensure that adequate and sufficient documentation is available to demonstrate that expenditures meet a national objective, and will also endeavor to expend funds in a timely manner.

The City of Newburgh has encountered a number of challenges in meeting the needs of residents. The greatest obstacle, lack of financial resources, is being addressed by continuing and on-going efforts to seek funding from private and public sources. It is important for the City to identify and partner with competent housing and workforce professionals to undertake programs, as the City workforces are being reduced through budget cuts, making the provision of primary services like sanitation, fire, and police more difficult to deliver.

In 2010, the City of Newburgh CDBG rehabilitation program commenced. The program includes three major components: homeowner rehabilitation, rental unit rehabilitation and façade improvements. A fourth component that has developed interest during the third quarter of 2010 is the Small Business Loan program.

As of October, 2010, the City has received several applications for renovations. The program has helped nine property owners and an additional three applications are being processed at this time. Funds were provided by both grants and loans ranging from \$3,000 to \$30,000. Scopes of work ranged from a hole in a soffit to exterior repairs, relocation of sewer line, and replacement of a boiler, plumbing, electric, air conditioning, etc. 32% of the funds allocated under 2009-R and 2010 funds have been obligated.

C. Sources of Funds

The following identifies resources from public and private sources, including those amounts allocated under HUD formula grant programs and program income that are reasonably expected to be made available to the City of Newburgh to carry out the Consolidated Plan.

The City of Newburgh anticipates the following funds will be available to carry out activities during the FY 2011 Program Year:

<u>Revenues</u>	
Anticipated FY 2009 Funding	\$ 860,000
Program Income	\$ 50,000
<i>Total Entitlement Funding</i>	<i>\$ 910,000</i>

<i>Reallocated Funding</i>	<i>Original Allocation</i>		<i>Total to Be Reallocated</i>
2005	Downpayment Assistance	\$50,000	\$ 10,000
CDBG-R 2009	Sealed Bid	\$103,072	\$ 88,072

2009	Strategic Code Enforcement	\$100,000.00	\$ 40,000
2009	Newburgh 20/20	\$ 77,000.00	\$ 25,000
2009	Street Trees	\$ 5,000.00	\$ 5,000
2009	Senior Programs	\$ 10,000.00	\$ 10,000
2009	Property Disposition	\$ 35,000.00	\$ 34,000
2009	Administration	\$ 215,631.00	\$ 77,000
2009	Property Stabilization	\$ 70,000.00	\$ 30,515
2010	Rental Rehabilitation	\$ 200,000	\$ 140,000
<i>Total Reallocated Funds</i>			\$ 459,587
<i>2010 Unallocated Funding</i>			\$ 84,955
Grand Total Funding for FY 2011			\$ 1,454,542.00

D. Statement of Specific Objectives

During 2011, activities will be undertaken to meet the following objectives identified in the 5 year Comprehensive Plan:

HOUSING OBJECTIVES:

- Provide property rehabilitation assistance.
- Provide opportunities for additional ownership and rental housing.
- Expand the supply of affordable housing in good condition that meets the needs of the City's diverse households and family structures.
- Continue to identify and address major impediments to the creation of affordable housing at the local level.

ACTIVITIES

- Provide rehabilitation assistance to property owners and purchasers of city-owned properties.
- Provide financial assistance to income-eligible residents for labor and material costs to make necessary repairs.
- Explore long term approaches to stabilizing the supply of affordable housing as tools to maintaining ownership and rental affordable housing.
- Support the development of a rent-to-own program
- Encourage the provision of housing counseling as an appropriate partner with not for profits and banks working in homebuyer education and foreclosure prevention.
- Explore effective and innovative approaches to assist first time homebuyers with down payment and closing costs.

- Support the loan committee in assisting the implementation of the financial assistance program.
- Provide activities to promote homeownership in the City of Newburgh to those low/moderate income residents who are currently renting, including those who are living in public housing.
- Fund clearance and demolition activities as appropriate to address blight and hazardous conditions.

WORKFORCE & ECONOMIC OBJECTIVE:

- Upgrade the physical condition of the targeted areas and the City as a whole, including the Lander Street area identified in the 5 year comprehensive plan, to reduce and prevent blight, create and retain jobs, and provide housing opportunities close to employment.

ACTIVITIES

- Provide support through a rehabilitation specialist to provide technical assistance to low and moderate income property owners.
- Fund clearance and demolition activities as appropriate to address blight and hazardous conditions.
- Combine CDBG funds with other program funds and private sector commitments as public private partnerships for redevelopment within the targeted area.
- Utilize CDBG funds for façade grants in commercial corridors and develop loans for new/expanding businesses that will enhance commercial rehabilitation, business expansion and/or job development.
- Provide rental assistance to start-up businesses
- Provide funds to upgrade infrastructure, including street, sidewalk, recreation and utility systems.
- Encourage workforce and economic development initiatives, including but not limited to enhance child care, business services, transportation to neighborhoods and city centers, and amenities that support business development such as neighborhood parks, well maintained streets, community gardens arts and culture.

INFRASTRUCTURE OBJECTIVE

- Maintain and upgrade infrastructure and facilities in order to support revitalization and rehabilitation in blighted areas.

ACTIVITIES

- Fund street and sidewalk repairs in targeted area.
- Provide CDBG funding to leverage capital improvement fund
- Continue to support streetscape improvement projects.
- Remove architectural and sidewalk barriers to enable handicapped and senior accessibility where needed.

PUBLIC SERVICE OBJECTIVE

- Provide resources that provide services to low income households.

ACTIVITIES

- Provide residents in targeted low and moderate income area neighborhoods support by implementing anti-gang/ youth violence reduction activities.
- Empower neighborhood revitalization approach by developing “A Brush with Kindness” program, helping neighbors donate their time and effort to rehabilitate their neighborhoods.
- Target public services to low income families including literacy, education, and job training services.
- Support youth and employment programs that will lead to job opportunities for area residents.

TRANSITIONAL HOUSING OBJECTIVE

- Support for Homeless and Transitional Housing Services

ACTIVITIES

- Strengthen partnerships and participation in the Orange County Housing Consortium
- Support applications submitted by the Orange County Housing consortium and its participating agencies to HUD under the SUPERNOFA
- Participate in the 2011 Homeless count within the City of Newburgh
- Work with local agencies to strengthen homeless and transitional housing initiatives.

IMPLEMENTATION OF PLANNING EFFORTS

In recent years the City of Newburgh has reviewed housing, workforce and economic development issues comprehensively through various planning efforts. These planning initiatives have included the Comprehensive Sustainable Master Plan, Impediments to Fair Housing Analysis, 5 Year Comprehensive Plan and most recently, Brownfield Opportunity Area Study, a Distressed Properties Analysis. The community development goals identified in each plan are consistent with HUD’s anti-poverty strategy. From each of these studies, an overarching priority emerged: to provide suitable affordable housing for owners and renters of mixed incomes. The City has decided to specifically utilize CDBG funds in a targeted effort with the goal of achieving a comprehensive and significant impact.

It is the goal of the 2011 annual plan to establish actionable items, as identified in these guiding documents, to address both the high level of neighborhood blight and the rising level of poverty within the City.

The Comprehensive Sustainable Master Plan provides guidance to the City of Newburgh as it moves forward implementing an approach to address community development needs within a neighborhood context. The plan calls for the City to develop a mix of housing types responsive to the present and future needs of its residents. For individuals progressing from one stage in life to the next, a variety of housing types within a neighborhood enables people to live where it suits their needs and desires while allowing them to maintain neighborhood bonds. A sustainable continuum of housing provides a balance that addresses the City's homeless, those requiring supportive/transitional/subsidized housing, affordable housing, workforce and market rate housing. It also contains policies and support for upward movement along that continuum.

Additionally, according to the City's Master Plan, "even though the employment available locally has been increasing, the beneficiaries are not among the city's poorest residents." A high number of City residents are long-term unemployed, public assistance recipients, and ex-offenders. Most of these individuals lack recent or substantial work experience, skills, and education and would benefit from training programs. Therefore the City's primary workforce development goal is to ensure residents are fully employed in secure, adequately paying jobs and there are enough opportunities at all income levels for those who wish to work reasonably close to home or at home.

HOUSING COMPONENT

Impediments to affordable housing include the high cost of rehabilitation and increasingly deteriorated housing stock, with 32% of homeowners experiencing housing problems. More than 70% extremely low income owners (approximately 149 households) as identified as distressed in the 5 year plan. Additionally, the numbers of properties in foreclosure continues to increase City-wide. These conditions create a considerable drain on neighborhoods and tax-base.

The following narrative provides an overview of each specific initiative, Housing Development, Workforce Development, and Service Activities

Tax Foreclosure Stabilization

The City of Newburgh has acquired through tax foreclosure proceedings more than 200 properties over the last two years, primarily in low income neighborhoods. To prevent their abandonment, CDBG funds will be utilized to make essential repairs and cover expenses of stabilizing the buildings and keeping tenants within the properties whenever possible. Funds would be used for materials, two laborers and a part time property manager.

Home Rehabilitation Programs

This program seeks to continue funding for homeownership and rehabilitation of rental units. Funds will assist in the production of new quality rental units and provide assistance in the form of loans, grants, loan guarantees, interest subsidies and other forms for rental housing rehabilitation

projects including health and safety, energy efficiency improvements, etc. Similarly, funding will promote rehabilitation of owner-occupied properties. Funding for staff as well as programs to support health and safety, energy efficiency and lead mitigation will be required. 70% of efforts will be within targeted area.

Housing Counseling Services

The City will support the development of services in connection with housing including homeowner counseling and foreclosure prevention services. Funding will be provided to not-for-profit agencies following a Request for Proposal process. The City will work to develop innovative approaches to spur homeownership as well as mitigate foreclosures both via private bank foreclosure and tax in-rem. The City will also partner with County and not-for-profit partners with similar missions and resources to address the needs within the housing continuum.

A Brush With Kindness

A “Brush with Kindness” is an exterior home stabilization and preservation program that provides painting, landscaping and weatherization services for low-income homeowners in need. It is anticipated that this program, managed by Habitat for Humanity of Greater Newburgh, will serve 10 – 12 families annually. A Brush with Kindness promotes the preservation of safe, decent, and affordable housing by providing the guidance and support that will help Habitat engage community resources and mobilize volunteers to serve low income homeowners with repair and renovation services. Homeowners will be counseled through completion of a simple application form and will include the application for the ARC and code office approval where required.

ECONOMIC & WORKFORCE DEVELOPMENT COMPONENT

One of the leading barriers to affordable housing is income, more so the lack of income on the part of Newburgh households to afford decent rental housing or a home. Further, a fundamental aspect of any anti-poverty strategy must include a strong economic development and workforce development approach. Initiatives under this component include small business development, workforce training and development as well as youth education and employment (therefore acting as a preventative measure against youth violence).

New Business Rental Subsidy Grant:

The New Business Retail Rental Subsidy Grant is an initiative to attract street level retail by underwriting the monthly rent in conjunction with the property owner for up to three years. The property owner agrees to reduce the cost of the monthly square footage by a certain dollar amount and the City will match that up to \$3.00 per square foot for a maximum 1,000 square feet for the first year. The City's contribution would decline 1/3 the second and third years. The City will focus on the Liberty Street Corridor.

Small Business Loan Program:

Provide businesses with funds for start-up costs, working capital inventory, machinery, equipment, and a contingency for emergency expenditures. This program does not support payment for taxes, water or sewer rents.

Demolition and Street Improvements

The City of Newburgh will develop a targeted approach in an effort to stabilize the Lander St. Area and Census tracts 4 & 5 through construction of street improvements as well as demolition of hazardous buildings. These projects will also allow the City of Newburgh to reach its workforce development goals.

Youth Violence Reduction Program & Employment –

Support workforce development initiatives and the principles outlined in the “Promising Neighborhoods” program. Programs have been designed to prevent gang violence and youth criminal activities, deter youth from joining gangs and to redirect gang involved youth from gang activities. Efforts have been prioritized that target public services to low income families including literacy, education, and job training services to complement gang prevention programs

E. Affordable Housing

Orange County HOME Funds low-income housing tax credits and private investment have historically contributed to the rehabilitation of income-qualifying rental housing. It is anticipated that these, or similar investments, will continue to occur in the City. A number of activities are aimed at increasing homeownership opportunities for Newburgh residents.

F. Other Actions

Other actions the City of Newburgh will carry out during Federal Fiscal Year 2011 are outlined below:

1. Institutional Structure/Service Delivery

The City of Newburgh created a Department of Planning and Development in 2004. This effort allowed the City to strengthen the delivery of housing and community development services and improve accountability and service delivery. The City continues to administer the CDBG program through its Department of Planning and Development. The City historically implemented CDBG activities itself and has collaborated with community partners and with other governments to deliver services. This service delivery structure will continue.

2. Foster and Maintain Affordable Housing

The primary barrier to affordable housing is the lack of income on the part of Newburgh residents, compounded by the level of physical deterioration of the housing stock with the resultant high costs of rehabilitation. The homeowner and rental rehabilitation programs will provide opportunities for re-use of vacant and foreclosed properties, among others, for affordable housing purposes.

3. Anti-Poverty Strategy

The primary focus of Newburgh's actions to reduce the number of poverty level families will be to support economic development programs with the goal of increasing employment opportunities. The City is focusing on small business development by providing rental assistance and loans to small businesses with the intent that additional jobs will be created within the key business corridors. Additionally, the City will continue to plan a comprehensive workforce development approach through the utilization of the recent Section 108 program income.

4. Evaluate and Reduce Lead Based Paint Hazards

As indicated in the Strategic Plan, the City will continue to work with the Orange County Health Department and its Childhood Lead Poisoning Prevention Program to reduce the number of housing units containing lead-based paint. All units rehabilitated with CDBG or HOME assistance must be abated in accordance with applicable regulations. The City is working with the Orange County Office of Community Development to improve capacity by providing training to contractors on all phases of lead abatement.

5. Coordination

The City of Newburgh Department of Planning and Development coordinates the resources available through the CDBG, HOME and other programs. The Department and its staff also work closely with various city departments and agencies to maximize positive impacts through efficient use of resources.

The City plans to continue its participation in the Orange County HOME consortium which will help to coordinate public efforts to create affordable housing. The City will also continue to work with the county and local housing and social service agencies on the Orange County Transportation Plan, Lead Safe Orange and Continuum of Care efforts.

6. Public Housing Improvement and Resident Initiatives

The Newburgh Housing Authority (NHA) was consulted during this consolidated planning process with the intention that the NHA will continue to make improvements to the assisted housing units under its management. The Authority does not qualify for Comprehensive grant funds since it does not meet the minimum unit threshold (250 units). However, the Authority has received CIAP funds for a variety of improvements in the past. The Authority intends to continue this improvement program during the coming year. The City of Newburgh will continue to provide technical assistance to NHA as appropriate.

7. Planning & Administration

In 2009, the City of Newburgh established a Community Development Block Grant Committee to advise on the creation and adoption of the five year comprehensive plan. This group has continued its efforts advising staff and City Council as to the use of the annual allocation, as well as review of funding. This committee will work with staff in 2012 to review and update the Analysis of Impediments to Fair Housing, as well as transitional housing barriers and analysis of programs for potential funding including a tenant eviction prevention strategy.

8. Neighborhood Stabilization

The City of Newburgh seeks to allocate KNEC funds to address distressed neighborhoods in Census Tract 4& 5 and the Lander St. Targeted area. In 2010, the City of Newburgh partnered with Pace University to evaluate and address distressed properties and in the process, set the stage for the future revitalization of the physical and social fabric of the City. The Distressed Properties plan is a comprehensive approach that analyzes the benefits of various structures and tools to address vacant, abandoned and blighted properties within a designated area. These include municipal policies like a nuisance abatement ordinance, as well as the development of a public authority to manage a land bank.

The recommendations of this study are organized around three key areas: future land use planning, enhancement of local codes and enforcement, and remediation of distressed structures. Activities supporting 2011CDBG goals include:

1. Develop a program for remediation or demolition of unsafe buildings.
2. Support property disposition planning and tax in-rem foreclosures
3. Develop the capacity to maintain properties, and further adopt clear and transparent disposition policies.

G. Analysis of Impediments to Fair Housing

The City of Newburgh conducted an "Analysis of Impediments to Fair Housing (AI) in 2006. This analysis included demographics; information on fair housing complaints; identification of impediments in the public and private sectors; and an assessment of the City's fair housing programs and activities. The analysis found existing conditions related to housing availability, which were considered in relation to the ability of other low-income communities and communities of color to provide safe and affordable housing. The primary barrier to successful affordable housing was found to be that many Newburgh residents are unable to obtain employment that allows them to participate even in these programs. This problem is compounded by physical deterioration of the housing stock and the resultant high costs of rehabilitation. Other existing conditions related to housing availability identified in the AI were the high level of residents reporting a disability; language barriers; the high concentration of vacant and abandoned housing in the lowest income, and most ethnically diverse neighborhoods, such as Census tract 4 and the high levels of poverty in ethnically diverse neighborhoods.

The analysis recommended a review of approaches to improving transportation to increase access to employment opportunities and lending institutions' underwriting practices.

There have been no significant changes in the minority population or housing patterns since the City conducted its AI in 2006, therefore, no substantial revision to the AI has been undertaken since that time. The City anticipates completion of an impediments analysis in 2012, as additional census data will become available.

H. Monitoring

The City of Newburgh Department of Planning and Development will monitor use of CDBG funds and the achievement of established goals. The Department will gather performance data from implementing agencies as well as monitor activities carried out directly by the City itself. The Department will prepare a status report which assess progress and recommend programmatic revisions and/or amendments as appropriate.