

Annual Action Plan Executive Summary

Executive Summary (ES-05)

1. Introduction

The City of Burbank Annual Action Plan (Action Plan) for Fiscal Year (FY) 2020-21 covers the first year of the City's adopted Consolidated Plan for Fiscal Years 2020-2025. This planning document outlines the City's proposed project descriptions, resources, and outcomes for FY 2020-21 in order for the City to continue to receive Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) Program funding. The City estimates to receive an annual entitlement fund allocation for CDBG and HOME Programs totaling \$1,669,495.

Funding Decisions

The funding methodology for the FY 2020-21 CDBG Projects and Programs contained in the Action Plan are based on eligible activities and programs that principally benefit low and moderate-income households; aid in the prevention or elimination of slums and blight; and meet other community development needs having particular urgency.

Community Development Block Grant

The Community Development Block Grant (CDBG) Entitlement Program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C. 5301 et seq. Entitlement communities, such as Burbank, are permitted to develop their own programs and funding priorities in order to build better Burbank neighborhoods, expand and increase economic opportunities, and provide improved community facilities and services. The City's distribution of CDBG funds is composed of the following process:

- A review of proposals for CDBG eligibility and consistency with the goals and objectives of the Consolidated and Homelessness Plans, and City Council Goals, as applicable;
- Evaluation of effective and efficient programs;
- Review of proposals and recommendations by the City's Community Development Goals Committee (Citizen Participation); and
- Review of proposals and recommendations by the City Manager and Executive staff.

HOME Investment Partnership Program (HOME)

HOME funds are allocated to the City of Burbank under the Cranston-Gonzalez National Affordable Housing Act enacted in 1990. This program provides federal funds for the development and rehabilitation of affordable rental and homeownership housing. Funds are allocated by HUD to qualifying participating jurisdictions based upon a variety of demographic and housing factors. With the exception of a waiver granted for disaster-related funding, HOME funds are subject to a 25 percent match of non-federal or in-kind contributions.

The Community Development Department administers the use of HOME funds for eligible activities. Historically, the City utilizes HOME funds to create permanent affordable housing in the City's five Focus Neighborhoods, including special needs housing through partnerships with local and regional housing developers, Community Housing and Development Organizations, and minority-based contractors. The use of HOME funds will be based on individual proposals submitted to the Community Development Department that meet the Consolidated Plan Goals and Objectives. In addition, proposals are reviewed based on the leveraging of resources, financial feasibility, project affordability components, and the number of households to be assisted. Proposed programs and projects to be assisted with HOME funds will be presented to the City Council for consideration on a project by project basis.

Citizen Participation Summary

To encourage citizen participation in preparing the Action Plan, the City completed the following actions in accordance with the HUD approved Citizen Participation Plan.

- Released a Request for Funding Proposals for program and project proposals for FY 2020-21 CDBG funding;
- Utilized the goals and objectives of the Consolidated and Homelessness Plans in reviewing activities and programs for CDBG funding;
- Conducted two public meetings with the Community Development Goals Committee for the review of proposals, citizen participation, and funding recommendations;
- Solicited comments for 5 calendar days; and
- Provide an agendaized, public meeting on July 21, 2020 for the Annual Action Plan for Fiscal Year 2020-21 at the Burbank City Council – as an online meeting due to COVID-19 physical distancing restrictions.

Strategic Plan Summary

The Consolidated Plan's strategy to meet the needs of the community, referred to as a Strategic Plan, provides the general priorities and rationale for Burbank's investment

of federal funds. The City identified nine priority needs for the community and the corresponding goals to address them. The priority needs were formed based on the national objectives and outcomes supported by HUD.

Objectives

The national objectives originate from the statutory purposes of the formula grant programs:

- Provide decent affordable housing. The activities that typically would be found under this objective are designed to cover a wide range of housing possibilities under HOME and CDBG.
- Creating a suitable living environment. In general, this objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.
- Creating economic opportunities. This objective applies to the types of activities related to economic development, commercial revitalization, or job creation.

Outcomes

The outcomes reflect what the grantee seeks to achieve by the funded activity. The City of Burbank associates the national objectives to these outcomes.

- Availability/Accessibility;
- Affordability; and
- Sustainability.

3. Evaluation of past performance

HUD requires that grantees provide an evaluation of past performance. Since the program year 2019-20 is still in progress, the City of Burbank will evaluate performance outputs and outcomes for CDBG and HOME in the Consolidated Annual Performance Evaluation Report (CAPER) for FY 2019-20 prior to September 30, 2020. Through the annual monitoring of CDBG and HOME sub-recipients, contractors, community-based organizations/developers, the City ensures federal compliance of CDBG and HOME, as well as reporting on outcomes of activities and programs.

4. Summary

It is estimated that the City of Burbank will receive \$11,153,002 in federal funding for FY 2020-21 to address goals and objectives of City's Consolidated Plan. The amount includes Section 8 Housing Choice Voucher Program renewal funding of \$8,955,595, Continuum of Care Funding for chronically homeless persons of \$486,416, CDBG and Program Income totaling \$1,086,583, and \$624,408 in HOME Funds.

Based on the limited amount of federal funding resources available to the City and the priority needs determined to have a high priority level, the FY 2020-21 Action Plan will address the following programs and activities:

Housing

- Develop affordable housing opportunities for low to moderate income households, as funding permits;
- Support the use of Section 8 Housing Choice Vouchers to its fullest capacity;
- Monitor restricted affordable rental/owner units throughout the City; and
- Acquire and rehabilitate residential units for permanent and transitional housing for homeless and persons at-risk of homelessness.

Homeless Needs

Support programs and activities for homeless individuals, families, veterans, and persons at-risk of homelessness through the following:

- Participation in the Los Angeles County/City Continuum of Care (LACoC) and Service Planning Area Coalition meetings;
- Coordinate an annual homeless count for the City of Burbank;
- Support public service and emergency housing programs that assist the homeless;
- Administer Continuum of Care Funding for Permanent Supportive Housing Vouchers; and
- Leverage local funds to assist individuals and families experiencing homelessness with short-term rapid-rehousing, diversion, and prevention assistance, as funding is made available.

Other Special Needs

The City will also take actions in the coming year to:

- Work toward reducing impediments to fair housing choice for low to moderate-income households;
- Implement a pilot Accessory Dwelling Unit Partnership to create rent-restricted garage conversions for low-income households;
- Assist renters with information on accessibility to decent and safe living conditions;
- Work toward enhancing coordination between public and private organizations, public institutions, and social service agencies;
- Facilitate the development and investment of programs and activities that accomplish the Consolidated Plan Goals and Objectives; and
- Provide capacity building and technical assistance to homeless service providers.

Expected Resources

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

Introduction

The City of Burbank (City) will use both private and public resources to create and preserve affordable housing, improve the safety and livability of neighborhoods, and expand economic opportunities for its residents. This section summarizes the main sources of potential funding to carry out housing and community development activities. The City's estimated funding levels for formula grant programs include CDBG and HOME.

Public Funding

Public funding at the federal level comes from CDBG, HOME, and Public Housing Assistance (Section 8) and Permanent Supportive Housing as the foundation for implementing the five-year Consolidated Plan for Fiscal Years 2020-2025. CDBG funding can support the strategic plan priorities identified in the Consolidated Plan. The strategies include public/community services; public facility improvements; infrastructure improvements; economic development; and program administration. Table 1 below shows the anticipated resources from public funds.

Anticipated Resources

Program	Source	Uses	Annual Allocation:	Program Income:	Total	Description
CDBG	Public-federal	Administration; capital projects; economic development and public services	\$1,045,087	\$41,496	\$1,086,583	The FY 2020-21 projected allocation for projects and programs are as follows: administration (20%); public services (15%); and capital/economic development (65%).
HOME	Public-federal	Administration Acquisition and rehabilitation of multi-family units to create	\$624,408		\$624,408	FY 2020-21 allocation for affordable housing activities and

		permanent affordable rental housing				program administration.
Section 8 Housing Choice Voucher	Public-federal	Rental Assistance only	\$8,955,595		\$8,955,595	Section 8 Housing Choice Vouchers provide rental subsidies to extremely low income individuals and families from the Housing Authority's waiting list.
Special Needs Assistance Program	Continuum of Care	Rental Assistance, Administration, Supportive Services	\$486,416		\$486,416	The Permanent Supportive Housing Vouchers will provide rental assistance to individuals and families who meet the definition of chronic homelessness
					\$11,153,002	

Table 1 - Expected Resources – Priority Table

Private Funding

When considering private sector funding, the City may also work with the lending community to provide dollars to meet the City's needs through the Community Reinvestment Act (CRA) such as economic development activities and assistance to first-time homebuyers. Programs include:

Federal, State and Private Resources Available for Housing and Community Development Activities Competitive Programs			
Program		Description	Eligible Activities
Emergency Solutions Grant (Federal)		Provides assistance to address the community's overall efforts to impact homelessness and align with local priorities, ensure that households experiencing homelessness, including those with high barriers to housing stability or high-service needs are able to participate in ESG-funded activities, and shorten the length of time people experience homelessness.	Street Outreach and Emergency Shelter, Homeless Prevention, Rapid Rehousing Assistance, and local grant administration.
Permanent Housing	Supportive	Provides permanent housing aid with supportive services to be provided with other sources of funds. Assistance provided to homeless people with disabilities and their families. Selection is on a nationwide competitive basis.	Tenant based rental assistance

Table 5 (continued) Federal, State and Private Resources Available for Housing and Community Development Activities Competitive Programs		
Lending Community (Private)	The Community Reinvestment Act (CRA) requires certain regulated financial institutions to achieve goals for lending in low- and moderate-income neighborhoods. As a result, most of the larger private lenders offer one or more affordable housing programs, such as first-time homebuyer, housing rehabilitation, or new construction	Varies, depending on individual program offered by private lenders.
Home For Good Funder's Collaborative (Private)	Public and private funders have created a Funder's Collaborative by aligning funding for permanent supportive housing, a critical solution to end chronic homelessness.	Capacity Building, Permanent supportive housing creation and operations, and supportive service grants for the homeless.

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City leverages resources among the formula grant programs. For example, the CDBG program is leveraged by a variety of sources including private and public investment; in-kind services; and City General Funds. The match requirement of 25 percent of the total HOME funds drawn down for projects continues to be met by former redevelopment tax increment credits. As a result of the elimination of redevelopment tax increment, the City will be utilizing a match carry-over credit surplus derived from prior contributions by the former Burbank Redevelopment Agency for the development of affordable housing activities. The match carry-over credit surplus is approximately \$7,746,230.45. The City will also pursue competitive public and private grants for the development and preservation of programs, housing, and services. During FY 2020-21, the City will consider competing for federal, state and

private resources available for housing and community development opportunities listed above.

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

The City does not own any available excess land that may be used to address the needs in the City's five-year Consolidated Plan for Fiscal Year 2020-2025.

Discussion

Please see the narrative above for discussion.

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserving Affordable Housing	2020	2021	Housing	Focus Neighborhood	Housing	HOME: \$624,408	3 Units created
2	Economic Development	2020	2021	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: TBD	5 people assisted
3	Homelessness	2020	2021	Housing	City-wide	Low to Moderate Income Benefit	CDBG: TBD	285 people assisted
4	Community Facilities	2020	2021	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: TBD	285 people assisted
5	Infrastructures	2020	2021	Non-Housing	Low Income Neighborhoods	Low to Moderate Income Benefit	CDBG: TBD	100 people assisted
6	Public Services	2020	2021	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: TBD	600 people assisted
7	Administration	2020	2021	Non-Housing	n/a	n/a	CDBG: \$217,316	n/a

Table 2 – Goals Summary

Goals Description

Goal		Outcome Indicators	Outcome Unit of Measure (2020-2025)	Outcome Expected (Annually)
1	Community Facilities	Public/Private Facilities (i.e.: emergency shelter, libraries, community centers) and/or Infrastructure Activities other than Low/Moderate Income Housing	Total Persons Assisted 1,425	285 unduplicated people
2	Infrastructure Improvements	Public Facility, Streets, Alleys, code enforcement, abatements or Infrastructure Activities other than Low/Moderate Income Housing	Total Persons Assisted 500	100 unduplicated people
3	Public Services	Public service activities other than Low/Moderate Income Housing including senior, youth, childcare, disabled, and health services	Total Person Assisted 3,000	600 unduplicated people
4	Homelessness	Public service activities other than Low/Moderate Income Housing including mental health, outreach, emergency services, rent assistance, and counseling	Total Persons Assisted 1,425	285 unduplicated people
5	Economic Development	Public service activities other than Low/Moderate Income Housing including capacity building, job training, business workshops, etc.	Total Persons Assisted 25	5 unduplicated people
6	Preserving Affordable Housing	Rent or owner restricted units, acquisition, rehabilitation, predevelopment, conversions, transitional housing, Accessory Dwelling Units	Household Housing Unit 15	3 units
7	Administration	Planning, Administration, and Housing Counseling	n/a	n/a

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name
1	Lesar...Capacity Building
2	Boys and Girls Club.. New Club House
3	Community Development Department.. Accessory Dwelling Unit
4	Armenian Cultural Foundation...Solar Panel Project
5	Family Service Agency...Care Cottages
6	Burbank Temporary Aid Center...Emergency Services
7	YMCA...Learn, Grow, Thrive
8	Boys and Girls Club...Afterschool Drop-In Program
9	Armenian Relief Society...Social Services
10	Kids Community Dental Clinic...Dental Care
11	Family Promise of the Verdugos...Rapid Rehousing
12	Burbank Coordinating Council...Camperships
13	Community Development Department...Abating Illegal Encampments
14	Burbank Noon Lions...Health Programs
15	CDBG Administration
16	HOME Administration

Table 3 – Project Information

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

The FY 2020-21 Annual Action Plan will address the Consolidated Plan goals and objectives established for Fiscal Years 2020-2025. The City of Burbank has taken several factors into consideration for prioritizing CDBG funds. These include 1) those households most in need of housing and community development assistance, as determined through the Consolidated Plan Needs Assessment, consultation, and public participation process; 2) which activities will best meet the needs of those identified households; and 3) the extent of other non-federal resources and programs available to address these needs. Burbank's primary source of funds to address the community's access and availability to housing and services are CDBG funds. The Strategic Plan also includes Burbank's priority for non-housing needs

include community facility, infrastructure, public service, economic development, and planning needs. The unmet housing needs identified in the City's five-year Strategic Plan are based on 2010 census data of households with housing problems compiled as part of the CHAS Databook. Finally, the funding priorities include input from various institutions, nonprofits, businesses, and residents.

AP-38 Project Summary

Project Summary Information

1	Project Name	Family Service Agency - Care Cottages at Puerta Nueva
	Target Area	City-wide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: 45,000
	Description	Provide counseling services and therapy for victims fleeing from domestic violence and residing in transitional housing
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	19 unduplicated clients
	Location Description	Site confidential
	Planned Activities	Delivery of professional and licensed clinicians
2	Project Name	Burbank Temporary Aid Center -Emergency Services
	Target Area	Homeless and At-Risk
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$31,500
	Description	Providing rental assistance, utility assistance, food pantry, reimbursement of operating showers and laundry (water and electricity)
	Target Date	6/30/21

	Estimate the number and type of families that will benefit from the proposed activities	700 unduplicated low-income residents served
	Location Description	1308 W. Burbank Blvd
	Planned Activities	Emergency service provisions
3	Project Name	YMCA - Learn Grow Thrive
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Childcare
	Funding	CDBG: \$21,143
	Description	Provide educational enrichment programs for children entering second grade through eighth grade who are under performing
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	12 unduplicated children from low-income households
	Location Description	Burbank Unified School District
	Planned Activities	Educational and arts curriculum taught by instructors
4	Project Name	Boys and Girls Club – Drop-In Afterschool Program
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Childcare
	Funding	CDBG\$ 15,000
	Description	Provide afterschool programs for students 8 -15 years of age
	Target Date	6/30/21
	Estimate the number and type of families that	110 unduplicated children from low-income households

	will benefit from the proposed activities	
	Location Description	Burbank Unified School District Campus and Main Club House
	Planned Activities	Program scholarships for membership fees
5	Project Name	Burbank Noon Lions – Health Services
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Health services
	Funding	CDBG: \$5,002
	Description	Providing free and low-cost vision and hearing screenings and equipment/materials
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	38 unduplicated low income clients
	Location Description	Citywide
	Planned Activities	Professional screening reimbursements, purchase of prescription glasses, and refurbishment of hearing aids
6	Project Name	Armenian Relief Society – Social Services
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Senior services
	Funding	CDBG: \$27,956
	Description	Low income clients will receive employment services, case management, housing navigation, supportive services to seniors and people experiencing homelessness
	Target Date	6/30/21
	Estimate the number and type of families that	140 unduplicated clients to be served

	will benefit from the proposed activities	
	Location Description	517 W. Glenoaks Blvd, Glendale
	Planned Activities	Case management, housing placement, life skills
7	Project Name	Kids Community Dental Clinic – Dental Services
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Health services
	Funding	CDBG: \$16,122
	Description	Education on tooth decay prevention, children receiving fluoride treatment, and access to dental care
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	40 low income children to be served from Burbank
	Location Description	400 W. Elmwood Ave, Burbank
	Planned Activities	Marketing materials and dental treatments
8	Project Name	Family Promise of the Verdugos – Rapid Rehousing
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG:\$45,000
	Description	Providing low-income households with temporary rent assistance and case management to prevent homelessness
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	12 total families served and moving into permanent housing

	Location Description	Scattered sites
	Planned Activities	Rental assistance and case management
9	Project Name	Burbank Coordinating Council – Camperships
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Youth Services
	Funding	CDBG: \$12,000
	Description	Provide a week of resident or virtual camps for children ages 7 – 18 years of age from low-income families.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	46 children from low-income families to be served
	Location Description	Scattered sites
	Planned Activities	Financial assistance to low-income households.
10	Project Name	Abating Illegal Encampments
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	CDBG: \$50,000
	Description	Address the legal abatement of homeless encampments in public right of way, public property, and parks/parking lots
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	30 individuals residing in an encampment will be connected to services, shelter, and health services as a result of a legal abatement.
	Location Description	Citywide

	Planned Activities	Performance of legal abatements by contractor or Public Works, equipment and supplies
11	Project Name	Lesar - Capacity Building
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$50,000
	Description	Develop advisory and technical assistance services, create performance measures, data collection, draft policies, fulfill homelessness goals, etc.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	Serving 3 to 5 Service Organizations with Capacity Building.
	Location Description	Citywide
12	Planned Activities	Technical assistance, assessments, strategic planning
	Project Name	Pilot Accessory Dwelling Units for Low-Income Households
	Target Area	Citywide
	Goals Supported	Preservation of Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$230,000
	Description	Provide professional construction assistance, financing at a 1:1 cost sharing ratio for the conversion of a garage into an ADU unit for low-income household for a period of 6 to 8 years.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	5 low-income households will be assisted as a result of the ADU Conversion
	Location Description	Citywide

ATTACHMENT 2-17 – ANNUAL ACTION PLAN

	Planned Activities	Planning, construction, rehabilitation, and overhead costs
13	Project Name	YMCA – New Club House Acquisition and Rehabilitation
	Target Area	Citywide
	Goals Supported	Community Facilities
	Needs Addressed	Youth Services
	Funding	CDBG: \$500,000
	Description	Provide CDBG funds for acquisition and rehabilitation of 300 E. Angeleno Ave
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	350 children enrolled in the Boys and Girls Club
	Location Description	300 E. Angeleno Ave, Burbank
	Planned Activities	Acquisition and Rehabilitation
14	Project Name	Burbank Youth Center - Solar Panel Project
	Target Area	Low-Income Neighborhood
	Goals Supported	Community Facilities
	Needs Addressed	Youth Services
	Funding	CDBG: \$175,000
	Description	Install a 61.06 kW photovoltaic system on the rooftop of the Burbank Youth Center.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	500 low-income households served
	Location Description	75 E. Santa Anita Ave, Burbank
	Planned Activities	Planning, solar panel installation, electrical, permits
15	Project Name	CDBG and HOME Administration

ATTACHMENT 2-18 – ANNUAL ACTION PLAN

	Target Area	n/a
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$217,316 HOME: \$62,440
	Description	Utilization of 20% cap for CDBG administration and 10% cap for HOME
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	n/a
	Location Description	275 E. Olive Avenue, Burbank
	Planned Activities	Planning, program oversight, monitoring, reporting, program development

AP-50 Geographic Distribution – 91.220(f)

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

The City must describe the distribution of funding by geographic areas, including the areas of low-income and minority concentration in which the City will direct assistance during the 2020-21 program year. The City estimates that a major percentage of CDBG funds will be used city-wide. However, HOME funds will target low to moderate-income persons residing in low-income neighborhoods or areas of minority concentration. The City has identified five of these areas, also known as Focus Neighborhoods. The Community Development Department manages the Focus Neighborhood Revitalization which includes Verdugo-Lake; Elmwood; Golden State; Peyton-Grismer; and Lake-Alameda neighborhoods. Within these neighborhoods, the City invests HOME and other local affordable housing funds, in partnership with affordable housing developers, to acquire, rehabilitate, and create new affordable housing units for low to moderate-income households. In exchange for HOME and public fund investments, the City will require long-term affordable housing restrictions to run with the land.

Geographic Distribution

Target Area	Percentage of Funds
Preserve Affordable Housing/Focus Neighborhood Revitalization (low-income neighborhood)	HOME 100%
Preserve Affordable Rental Housing	Section 8: 100%
Community Facilities/Infrastructure Improvements/Economic Development	CDBG: 65%
Youth Services	CDBG: 15%
Emergency Services	
Senior Services	
Health Services	
Homelessness	
Other Public Services	

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City geographic target areas are City-wide, except for the City's five Focus Neighborhood Revitalization areas. The Housing and Economic Development Division administers the Focus Neighborhood Revitalization Program, which includes: Verdugo-Lake; Elmwood; Golden State; Peyton-Grismer; and Lake-Alameda. Within these neighborhoods, the City will strategically invest HOME funds to assist non-profits and/or Community Housing Development Organizations in acquiring, rehabilitating, redeveloping, and managing rental properties as long-term affordable housing. In exchange of the HOME investment, the City will place covenants on properties acquired by the non-profit or Community Housing Development Organization to ensure long-term affordability and strong property management.

Discussion

See above.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Tables 5 and 6 below include proposed accomplishments for CDBG, HOME, and Section 8 for FY 2019-20. The City is proposing to achieve one year accomplishments based on the goals and objectives listed in Table 6. The categories pertaining to the Homeless Goals include: emergency services, case management, counseling, job placement, resume building, social services, and general assistance to the homeless and those at-risk of homelessness. Non-Homeless Goals include youth programs, child care, senior services, health awareness and other public services. Special Need Goals include services for the disabled, mentally ill, and substance and alcohol abuse. The goals for the number of households to receive permanent housing are derived from the Section 8 Program, acquisition of multi-family housing as permanent affordable housing units, and Permanent Supportive Housing Vouchers.

One Year Goals for the Number of Households to be Supported
Homeless : 30
Non-Homeless: 990
Special-Needs: 0
Total : 1,020

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through
Rental Assistance: 1,020 (based on FY 2020-21 renewal funding & new Permanent Supportive Housing vouchers)
The Production of New Units: 0
Rehab of Existing Units: 0
Acquisition of Existing Units: 0
Total: 1,020

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

No public housing is located in Burbank. The Burbank Housing Authority administers the Housing Choice Voucher (Section 8) Program, but does not own any project-based rental assistance housing.

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

No public housing is located in Burbank.

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

No public housing is located in Burbank.

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

Not applicable.

Discussion

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

Introduction

For many years, the City has confronted the challenge of homelessness through multiple arenas that have involved partnerships and coalitions, financial contributions, and indirect participation in serving the homeless in the community.

In an ongoing effort to continue to address the needs of the homeless and those at-risk of homelessness, the City will continue its partnerships with experienced service providers capable of leveraging other funding; the ability to create or secure affordable housing; perform homeless case management; and engage the homeless through a street outreach component in order to connect them to available services. The City's goal is to expand on current homeless programs and activities with a greater emphasis on homeless veterans and families to assist with their successful transition toward self-sufficiency.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In an ongoing effort to continue to address the needs of the homeless and those at-risk of homelessness, the City will continue its partnerships with experienced service providers capable of leveraging other funding; the ability to create or secure affordable housing; perform homeless case management; and engage the homeless through a street outreach component in order to connect them to available services. The City's goal is to expand on current homeless programs and activities with a greater emphasis on homeless veterans and families to assist with their successful transition toward self-sufficiency.

Street Outreach: A component of the City's efforts to reach out to homeless persons involves a year-round Burbank Street Outreach Program. During the period of inclement weather, this program connects the homeless to the Regional Winter Shelter Program in Los Angeles County/City and other affordable housing programs. The Program also promotes the City's participation in the Los Angeles Continuum of

Care Coordinated Entry System and pairing the homeless to mental health/supportive services, permanent supportive housing, case management, and emergency assistance, as appropriate. In September of 2019, the City approved a 12-month contract with Streetplus to expand the homeless outreach in downtown Burbank to a City-wide Program. The Streetplus team is available 7 days a week to perform outreach.

Burbank Mental Health Evaluation Team: In 2012, the Burbank Police Department (BPD) aligned with the Los Angeles County Department of Mental Health and created a co-response police/mental health clinician model (Burbank Mental Health Evaluation Team, or BMHET) to address the growing needs of those suffering from mental illness and homelessness. BMHET is comprised of BPD officers and a licensed Department of Mental Health clinician, and is used to respond to calls for service where subjects appear to have mental health disorders. Once on scene, BMHET determines if further mental health treatment is required, utilizing the various resources available through the LA County Department of Mental Health. By providing sustained mental health care for homeless in need, the City hopes to reduce the number of individuals facing chronic homelessness. The City has integrated the new BMHET into its Consolidated Plan Homeless Strategy.

Continuum of Care: Burbank is a part of the Los Angeles Homeless Services Authority (LAHSA), the lead agency in the Los Angeles City/County Continuum of Care (LA CoC). In recent years, Burbank expanded its' relationship with LAHSA to support regional efforts of ending homelessness for individuals, families, and veterans. In January 2020, Burbank participated in the annual Greater Los Angeles Point-In Time Count (PIC) for the LA CoC. The PIC data is pending and it's expected to be released by the Los Angeles Homeless Services Authority in July 2020. Based on the data collected, from 2019, the City's total homeless population is 282, an increase of 43% from 2018 (200). Utilizing LAHSA's factors, the 282 sheltered and unsheltered homeless counted translates to an estimated 492 persons experiencing homelessness in Burbank over an entire year as described in Table 10.

Addressing the emergency shelter and transitional housing needs of homeless persons

Shelters: Burbank addresses the emergency needs of the homeless and other persons needing emergency shelter by actively participating in programs administered by public and quasi-public agencies. While no permanent year-round low-barrier shelter exists within Burbank, from December 1 up until March 31, various winter shelter beds in Los Angeles County/City are available to Burbank homeless. However, due to the Coronavirus epidemic (COVID-19), several shelters were extended through September 2020. The winter shelter within a 10-mile proximity to Burbank is the Pacoima Winter Shelter, a 170-bed program operated by Hope of the Valley. The shelter is located at 11066 Norris Ave, Pacoima. The City of Burbank and Hope of the Valley provide a shuttle pick-up & drop-off during the shelter operations. The City of Burbank also provided bus fare to homeless who wish to access the winter shelters. The City supports the motel voucher assistance program administered by the Burbank

Temporary Aid Center (BTAC) providing motel vouchers to homeless persons and families.

In addition, Family Promise of the Verdugos, a non-profit organization, serves homeless families by providing emergency shelter and supportive services. Family Promise is dedicated to moving families with children from homelessness to lasting self-sufficiency. Associated with the national network of the same name, Family Promise advances a highly effective, sustainable and expandable service delivery drawing on resources of the faith community, churches, synagogues, mosques, and temples. The three main components of the program are outreach and screening, transitional housing, and extensive counseling and case management.

Transitional and Permanent Supportive Housing Programs: Since 1997, the City has partnered with Burbank Housing Corporation, a certified Community Housing Development Organization, to develop affordable housing by acquiring and rehabilitating deteriorated properties in the City's five Focus Neighborhoods (Elmwood, Verdugo-Lake, Peyton-Grismer, Golden State and Lake-Alameda). This partnership has created an avenue for the City to commit and expend HOME fund allocations. Since the program's inception, 316 affordable rental units have been created through this partnership. These efforts include units for the City's Transitional Housing Program that supports victims of domestic violence, homeless families, and young adults/emancipated youth.

The Burbank Housing Corporation owns and operates 29 transitional and permanent supportive housing units which consist of seven units for homeless families in the Golden State Focus Neighborhood (2406 Naomi Street and 2615 Thornton Avenue); three units for young adults/emancipated youth in the Lake-Alameda Focus Neighborhood (225 Linden Avenue), five transitional units for victims of domestic violence, 11 permanent housing units for veterans (1101 W. Verdugo Ave), and three units of transitional housing for homeless families exiting emergency shelter (1932 Ontario Street).

The Family Service Agency, in partnership with the Burbank Housing Corporation, operates a comprehensive domestic violence intervention/prevention program by providing clients transitional housing. The program is targeted towards women with children serves all members of the family with core services from individual mental health care, parent support groups, family counseling, and therapy for youth and adult survivors, just to name a few. Family Service Agency has been serving the Burbank community as of 1991.

The Burbank Housing Authority submitted a grant renewal to the U.S. Department of Housing and Urban Development for federal Permanent Supportive Housing Vouchers and to the U.S. Department of Veteran Affairs for the renewal of 30 vouchers (20 PSH and 10 Veteran Affairs Supportive Housing). The Housing Authority was notified of the grant renewal for FY 2020-2021.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening

the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again and

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Diversion to housing and services outside of the transitional homeless services is critical in preventing homelessness. The City works closely with housing advocates, non-profits, and local organizations to help individuals and families avoid becoming homeless. In December 2017, the City of Burbank adopted a three-year (2018-2021) comprehensive Homeless Plan to address the systemic issues surrounding homelessness. The Homeless Plan will contain an in-depth analysis of homelessness in Burbank, proposed measures & outcomes, and identify possible solutions, funding, and barriers to addressing the needs.

Homeless Prevention: For FY 2020-21, the City of Burbank will propose to contract for fair housing services that will consist of a range of services to ensure equal housing opportunities for its residents and homeless prevention, as applicable. Further, the City's Landlord-Tenant Commission serves to minimize evictions and unjust rent increases by mediating disputes between tenants and landlords (a contributing factor to homelessness).

Case Management Program: Homeless individuals or families and those at-risk of homelessness have the opportunity to voluntarily participate on a Case Management Program offered by the Burbank Temporary Aid Center. Participants are connected to supportive services, treatments, public resources and support groups.

Since 1991, Family Service Agency of Burbank has been providing comprehensive domestic violence intervention/prevention programs serving all members of the family. Services are provided by uniquely skills intervention teams that include: clinical staff; peer advocates; resource specialists; legal advocates; parent/financial educators; and supervisors who are committed to the care of clients 24 hours a day/7 days a week.

United Way of Greater Los Angeles: Since March 2012, the City has supported the United Way of Greater Los Angeles' Home For Good Initiative dedicated to ending chronic and veteran homelessness in greater Los Angeles. The United Way will assist communities with leveraging public resources, providing technical assistance, and providing solutions to end homelessness.

Other Programs and Activities: Homelessness is never solved by one entity; therefore, City departments continue to work together with local nonprofits, the business

community, and faith-based/charitable organizations to deliver services and find solutions to homelessness. Historically, the City has demonstrated its support in delivering services to the most vulnerable individuals and families. In partnership with a number of experienced service organizations, the City has been able to create housing and public services with the use of federal funds from Community Development Block Grant (CDBG) and HOME Investment Partnership Programs.

It is important that the City play a critical role in helping service providers plan programs and services in addition to providing financial resources. Again, solving homelessness will take a multitude of fully engaged organizers. The following are a few examples of measured investments that have created a positive return for Burbank. However, much more is needed in order to address the increasing number of homeless in Burbank and their service needs.

- Creating affordable transitional and permanent housing units;
- Leveraging the City's public resources expand our support for homeless projects and programs;
- Delivering mental health services and intervention; and
- Receiving and implementing a Permanent Supportive Housing Voucher Program for chronically homeless individuals and families.

While the City of Burbank and its partners have made significant strides in addressing the needs of the homeless, a gap remains in addressing public health and safety and the systemic cause of homelessness. By working together with local, County, and City of Los Angeles partners, the City can begin to build a comprehensive Homeless Plan for City Council consideration in September of 2017.

The Homeless Plan will be a proactive approach on homelessness by 1) creating action oriented solutions that address the ongoing systemic social issues of homelessness impacting our community; 2) A coordination of efforts to address homelessness with City Departments, public and private entities, businesses, and community involvement; and 3) a description of funding, barriers, and measurable outcomes.

Discussion

Please see above.

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

Introduction:

The City of Burbank is making significant efforts to identify housing problems and reshape its policies and programs to meet the community's needs in the coming years. These efforts are outlined below.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

July 2017, the Community Development Department presented an Affordable Housing Analysis and Strategy session. The session led to further discussion about the City's need to build more housing. Subsequently, two additional meetings were held with City Council in October 2018, and February 2019, which resulted in the Council supporting the construction of 12,000 dwelling units during the next 15 years, mainly along the Interstate 5 freeway corridor, which includes Downtown Burbank/Burbank Center Plan area, Airport District (Golden State Specific Plan) area, and parts of the Media District Specific Plan area.

Governmental regulations through the implementation of land use plans and ordinances as well as through growth management restrictions can affect the price of housing in a community. However, such regulations are also designed to ensure the health, safety, and compatibility of uses within the City. The following evaluates various governmental regulations in effect in Burbank.

The Land Use Element of Burbank 2035 (General Plan) and implementing Zoning Ordinance directly impact the amount, size, type, location and thus, cost of residential development. The control over land use is designed to ensure that new housing is compatible with adjacent uses and built to the standards of quality and livability of the City's neighborhoods. The Burbank 2035 Land Use Element permits a broad range of housing types and densities that address the housing needs of residents. Densities range from up to 14 dwelling units per acre (du/ac) in the Very Low Density Residential (R-1 and R-2) zone to 43 du/acre in the High Density Residential (R-4 and R-5) zones. The Land Use Element includes opportunities for new housing types such as, live-work units, transit-oriented and mixed-use residential development.

Virtually all residential neighborhoods in Burbank are fully built-out. In order to accommodate needed housing while preserving existing neighborhoods and hillside areas, Burbank 2035 directs new housing growth into the Downtown, the Media District, and onto mixed use corridors, providing more residents within walking distance of services, activities and public transportation. The Burbank Center Specific Plan has already proven successful in bringing housing to the Downtown and South San Fernando corridor, which in turn is contributing to the re-generation of the area.

The City's Zoning Ordinance sets forth the standards for residential development. These include density, setbacks, lot area, lot coverage, height, and parking standards. The City's zoning and development standards can encourage a variety of housing types. In addition to single-family and multi-family units in a range of densities, Burbank also permits second units and manufactured housing on lots zoned for single-family residential use. Licensed community care facilities serving six or fewer persons are permitted by right in residential zones. Emergency shelters for the homeless are permitted use in the M-2 General Industrial Zone and permitted with a Conditional Use Permit in the M-1 Limited Industrial Zone and BCCM Burbank Center Commercial Manufacturing Zone. The Burbank Zoning Code accommodates transitional housing differently depending on the project's physical structure: group-style transitional housing could be accommodated similar to community care facilities, whereas multi-family transitional housing configured with separate units could be accommodated by right in any of Burbank's multi-family districts.

Burbank has a strong history of supporting affordable housing. The City has adopted numerous provisions in its Zoning Ordinance that facilitate a range of residential development types and encourage affordable housing, including an inclusionary housing ordinance, density bonus ordinance, and planned development zone. In addition, the City and its former Redevelopment Agency have played an active role in supporting affordable and mixed income projects within the greater Downtown and Neighborhood Focus Areas.

Discussion:

Please see above.

AP-85 Other Actions – 91.220(k)

Introduction:

The Consolidated Plan documents that more than half of Burbank's low and moderate-income renter households face a cost burden, with 52% facing a severe cost burden. In response to attempting to meet the needs of the underserved, a significant amount of the City's housing resources are directed towards creating affordable housing and providing services to low and moderate-income persons through Section 8, CDBG, and the HOME during FY 2020-21.

Actions planned to address obstacles to meeting underserved needs

During FY 2020-21, the City will seek new funding opportunities to support the approved projects and programs related to housing and serving low and moderate-income persons. For example, in March 2020, the City received \$614,674 in Coronavirus Aid, Relief and Economic Security Act direct CDBG allocation. Those funds were appropriated for an Emergency Rent Assistance and Small Business Assistance Program for income-qualified participants.

Actions planned to foster and maintain affordable housing

Burbank has a strong history of supporting affordable housing. The City has adopted numerous provisions in its' Zoning Ordinance that facilitate a range of residential development types and encourage affordable housing, including an inclusionary housing ordinance, density bonus ordinance, and planned development zone. In addition, the City and its former Redevelopment Agency have played an active role in supporting affordable and mixed income projects within the greater Downtown and Focus Neighborhood areas. The City will ensure that affordable housing preservation and the fostering of new opportunities continue to expand through a combination of efforts, which include:

- Monitoring of long-term rental restricted affordable units;
- Pursue alternative funding sources for rent subsidies, such as Permanent Supportive Housing, transitional housing, and U.S. Department of Housing and Urban Development Veteran Affairs Supportive Housing Vouchers;

- Provide tenant and landlord educational workshops regarding Fair Housing, tenant rights, and unlawful discrimination; and continue to explore regulatory incentives and funding to develop affordable rental housing.

Actions planned to reduce lead-based paint hazards

As a means of better protecting children and families against lead poisoning, in 1999 HUD instituted revised lead-based paint regulations focused around the following five activities:

- Notification
- Lead Hazard Evaluation
- Lead Hazard Reduction
- Ongoing Maintenance
- Response to Children with Environmental Intervention Blood Lead Level

The City has implemented HUD Lead Based Paint Regulations (Title X), which requires federally funded rehabilitation projects to address lead hazards. To reduce lead-based paint hazards in existing housing, all acquisition and rehabilitation projects undertaken by recipients of federal funds must test for lead and asbestos. In the event that a lead-based paint hazard is present, the City or recipient of federal fund contracts with a lead consultant for abatement or implementation of interim controls, based on the findings of the report. The recipient of federal funds must notify tenants of the results of the test and the clearance report. In Section 8 Programs, staff annually inspects units on the existing program and new units as they become available. In all cases defective paint surfaces must be repaired. In situations where a unit is occupied by a household with children under the age of six, corrective actions will include testing and abatement if necessary, or abatement without testing.

Further, the City places brochures on the risks of lead based paint in the offices of the Community Development Department for the benefit of the public. The documents are provided by the Los Angeles County Childhood Lead Prevention Program (CCLLP) and HUD. CCLLP is responsible for enforcement of L.A. County's Lead Abatement Ordinance, including inspection, regulations and consultation. The CCLPP may also provide the City with the address of any household where there is evidence of lead poisoning or elevated blood levels in children, or any other evidence of lead from a physical inspection of the property.

Actions planned to reduce the number of poverty-level families

Based on the Consolidated Plan's Needs Assessment and available resources for program year 2020-21, the City will allocate available resources (CDBG and HOME) to support public service programs for the benefit of low to moderate-income residents. The City will also expand and create new partnerships with service providers and community based organizations to provide community enrichment programming, affordable housing, case management services, and the development of life skills and self-sufficiency. These actions will be achieved by:

- Seeking opportunities to create new affordable housing by leveraging limited funding resources with private, federal, and state governmental subsidies and grants;
- Supporting permanent supportive housing for chronically homeless veterans by fostering effective supportive services that will promote self-sufficiency;
- Allocating 15 percent of CDBG entitlement funds for public services;
- Supporting case management services for homeless individuals and families and those at risk of becoming homeless; and
- Providing a range of economic development opportunities for economic growth that may benefit low to moderate income residents.

Actions planned to develop institutional structure

The City must provide a summary of the institutional structure and/or method through which it will carry out its Consolidated Plan, including gaps in the delivery system.

The City will proactively work with non-profit agencies, for-profit developers, quasi-public entities, advocacy groups, clubs, and organizations, the Burbank Chamber of Commerce, neighborhood leadership groups, City departments and with the private sector to implement the City's five-year strategy to address the priority needs outlined in the Consolidated Plan for Fiscal Years 2020-2025. Engaging the community and partners in the delivery of services and programs for the benefit of low to moderate residents will be vital in overcoming gaps in service delivery.

In terms of homelessness, the Burbank Housing Authority has adopted a waiting list preference for Burbank homeless. The City will utilize the waiting list preference to address the housing needs of the homeless, which partially addresses a gap in the accessibility of housing for the homeless in the community. The City of Burbank is also engaged in collaborative efforts that promote the use of the Coordinated Entry System and Homeless Family Solutions System in new affordable housing programs that target homeless and at-risk of homelessness individuals, families, emancipated youth, and veterans.

In addition, the City will continue to emphasize and solicit public input from the Burbank community in regards to the delivery of services and programs that will benefit low to moderate income persons. These methods include but are not limited to: public meetings and/or hearings; publications requesting public comment related to a Consolidated Plan, Annual Action Plan, or other federal compliance documents/activities; engaging low income residents, seniors, persons with disabilities, and special need populations in seeking their input on public policy; and utilizing the Community Development Goals Committee, consisting of nine Burbank residents, as a forum to allocate CDBG funding for eligible projects and programs.

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

In an ongoing effort to bridge the gap of various programs and activities, the City has developed partnerships and collaborations with local service providers and City departments that have been instrumental in meeting the needs and demands of the

homeless, low income individuals and families, and other special needs. The City will continue to expand on developing partnerships with public service organizations throughout FY 2020-21.

Discussion:

Please see above.

Program Specific Requirements

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

Introduction:

The City of Burbank participates in HUD's CDBG Program that be used for creating decent affordable housing, suitable living environments, and economic opportunities. The new program year will begin on July 1, 2020 to June 30, 2021. The CDBG entitlement allocation is \$1,045,087. The following information identifies CDBG Program Income that is available for use that is included in projects to be carried out.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	The City's CDBG Program Income for FY 2020-21 is \$41,496
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	The City does not participate in the Section 108 Loan Guarantee Program.
3. The amount of surplus funds from urban renewal settlements	The City does not receive any urban renewal settlement funds.
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	At this time, there have been no additional grant funds returned to the line of credit for new activities or programs.
5. The amount of income from float-funded activities	The City's CDBG Program does not receive income from float-funded activities.
Total Program Income	\$41,496

Other CDBG Requirements

1. The amount of urgent need activities	The City's CDBG Program will not have activities to fund for FY 2020-21 under urgent needs.

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

A description of other forms of investment being used beyond those identified in Section 92.205 is as follows: *The City will utilize its HOME Program for activities identified under Section 24 CFR 92.205 (Eligible Activities).*

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows: *Historically, the City's HOME Program has been utilized for creating affordable rental housing. In the event that HOME funds are used for homebuyer activities, the City will prepare guidelines to be used for the resale and recapture of HOME funds in accordance with 92.254 (Homeownership).*

A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows: *Historically, the City's HOME Program has been utilized for creating affordable rental housing. In the event that HOME funds are used for homeownership assistance, a policy on affordability requirements and guidelines for resale or recapture of HOME funds will be prepared in accordance with 24 CFR 92.254(a)(4) – Periods of Affordability*

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not own or operate rental units secured with multifamily housing and rehabilitated with HOME funds. However, if the City chooses to utilize HOME funds to refinance HOME assisted affordable rental units, at a minimum, the City will:

- a. demonstrate the rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing;*
- b. Require review of management practices to demonstrate that disinvestment in the property has not occurred, that the long-term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated;*
- c. State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both;*
- d. Specify the required period of affordability, whether it is the minimum 15 years or longer;*
- e. Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a Focus Revitalization Neighborhood; and*
- f. State that HOME funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG*

Appendix