

STAFF REPORT



COMMUNITY DEVELOPMENT

DATE: June 10, 2025

TO: Justin Hess, City Manager

FROM: Patrick Prescott, Community Development Director
VIA: Simone McFarland, Assistant Community Development Director
BY: Kasey Lee, Housing Development Manager

SUBJECT: Adoption of a Resolution to Approve the 2025-2029 Consolidated Plan, 2025-2029 Analysis of Impediments to Fair Housing Choice, and Substantial Amendment to the 2024-25 Annual Action Plan for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs

RECOMMENDATION

Adopt A RESOLUTION OF THE COUNCIL OF THE CITY OF BURBANK AUTHORIZING AND APPROVING:

1. THE SUBMISSION OF THE FIVE-YEAR CONSOLIDATED PLAN FOR FISCAL YEARS 2025-2029; AUTHORIZING THE CITY MANAGER OR DESIGNEE TO SUBMIT THE CONSOLIDATED PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD);
2. THE SUBMISSION OF THE ANALYSIS OF IMPEDIMENTS TO AFFIRMATIVELY FURTHER FAIR HOUSING CHOICE FOR FISCAL YEARS 2025-2029 AS REQUIRED BY THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; AND
3. AMENDMENT TO THE ANNUAL ACTION PLAN FOR FISCAL YEAR 2024-2025.

BACKGROUND

The City of Burbank receives approximately \$1,000,000 in Community Development Block Grant (CDBG) funds and approximately \$500,000 in HOME Investment Partnerships (HOME) funds annually from HUD. CDBG funds are used for capital projects and public service programs that primarily benefit the low-moderate-income community. HOME funds are used to create affordable housing for low-income households. To

receive these funds, the City is required to complete a Five-Year Consolidated Plan (Consolidated Plan) and a Five-Year Analysis of Impediments (AI) report.

In addition to the Consolidated Plan, the City is also required to complete and submit Annual Action Plans (AAP). AAPs describe the programs, goals, and funding that will be implemented in a given fiscal year. If the City makes changes to a previous year's AAP, a Substantial Amendment (SA) must be completed.

DISCUSSION

2025-2029 Consolidated Plan

The City's current Consolidated Plan expires on June 30, 2025. As a recipient of CDBG and HOME funds, the City is required to complete a Consolidated Plan every five years. The Consolidated Plan serves as a strategic framework for achieving the City's housing and community development goals. It includes a comprehensive assessment of local needs ranging from affordable housing and infrastructure to public services, economic development, and public safety. The planning process emphasizes community engagement through public hearings, stakeholder meetings, and a citywide needs assessment survey. Goals and priorities are established with the input received from the community engagement process, combined with an analysis of data-driven trends and conditions. The plan outlines how resources will be allocated to address these priorities, while ensuring that all programs and projects comply with the regulations and national objectives set by HUD.

The proposed plan will cover FY 2025-2029 (Attachment 2) and provides a five-year strategic framework for meeting community needs through eligible projects and programs. Goals and priorities were developed through a needs assessment process that incorporated input from the public and private sectors (Attachment 3), as well as organizations serving low- and moderate-income residents and individuals with special needs. For the proposed plan, community engagement efforts included a series of public meetings, workshops, and the distribution of surveys conducted in October and November 2024.

The Consolidated Plan also incorporates data and analysis to identify local conditions and emerging trends, drawing from sources such as the Comprehensive Housing Affordability Strategy (CHAS) and the American Community Survey (ACS). Based on the needs assessment process and supported by data-driven insights, the following three priorities have been established for the FY 2025–2029 Consolidated Plan:

1. Expand and Improve Affordable Housing Options
2. Support and Strengthen Homeless Services and Housing
3. Improve Quality of Life through Neighborhood Revitalization

Analysis of Impediments to Fair Housing Choice

The City must also complete the Analysis of Impediments to Fair Housing Choice, or AI, every five years. The City's current AI expires on June 30, 2025. The purpose of the AI is to identify and address barriers that prevent fair housing choices and ensure equal opportunity in housing for all residents. It involves reviewing policies, practices, and procedures that might restrict housing access based on protected characteristics. The goal is to remove these barriers and promote equal access to housing.

The analysis covers a wide range of policies and practices, including zoning, land use regulations, affordable housing programs, lending practices, and housing development policies. It involves gathering data on housing market trends, demographics, any available complaints or reports related to fair housing violations and assess the potential impact of policies and practices on different groups, considering factors like income, race, and disability.

Similar to the Consolidated Plan, the AI includes community outreach, such as engaging residents, community organizations, fair housing groups, and other relevant stakeholders, to collect feedback on perceived barriers and potential solutions.

The proposed AI will cover FY 2025-2029 (Attachment 4). The purpose of the AI is to demonstrate that the City is taking appropriate actions to further fair housing and foster inclusive communities. A major component of the AI is community input and feedback regarding fair housing issues. The proposed AI includes several actions and recommendations that are a direct result of feedback provided by community organizations and organizations representing special needs groups. AI survey results have been included (Attachment 5).

A significant portion of the data and analysis contained in the AI was gathered from existing data sources, such as the Burbank Housing Element, American Community Survey (ACS), the Southern California Association of Governments (SCAG), and the California Department of Housing and Community Development (HCD). As a result of community input and data analysis, the City developed AI findings and recommendations that will serve in enhancing the City's approach and plan to affirmatively further fair housing actions. The core strategies to overcome housing impediments are listed below. These strategies have already been put in place through the expiring AI and are recommended to be continued in the proposed AI.

- Strengthen fair housing enforcement by continuing to partner with the Housing Rights Center (HRC) to track housing complaints and investigate discrimination cases and continuing to hold monthly Landlord Tenant Commission (LTC) meetings.

- Expand affordable housing supply by continuing to provide vouchers programs and working with the Burbank Housing Corporation (BHC) to provide affordable housing.
- Enhance tenant protections through strengthened just-cause eviction policies and protections, continuing to consider anti-displacement measures including relocation assistance, and continuing to expand legal aid services.
- Increase public awareness by continuing to provide education and outreach activities to Burbank residents, professional associations, City Boards, Commissions and Committees, and apartment owners/managers on fair housing.
- Collaborate with stakeholders by continuing to partner with advocacy groups, landlords, developers and major employers to address housing challenges and continue to hold community meetings.
- Monitor and evaluate progress by considering publishing annual fair housing reports to maintain transparency and accountability.
- Conduct community surveys and use data driven tools to analyze information.

To continue affirmative implementation of these core strategies, the City will continue working closely with the Housing Rights Center (HRC), local service providers, non-profits, and the business community. An assessment and evaluation of accomplishments achieved by the City towards affirmatively furthering fair housing will be reported annually to HUD through the submission of a Consolidated Annual Performance Evaluation Report.

Substantial Amendment (SA) to the 2024-25 Annual Action Plan

Under the CDBG program, an SA is required when there are significant changes to an approved Annual Action Plan, such as shifting funds from one activity to another, or changing the purpose, scope, location, or beneficiaries of an activity. SAs are required when there is a reallocation of 10% or more of a City's entitlement funding.

On May 4, 2021, Council approved the 2021-22 CDBG AAP that included a \$500,000 appropriation for the Front Street Homeless Solutions Center (HSC) project,¹ and in October 2024, the CDBG Goals Committee recommended \$1,171,978.95 (\$691,978.95 in 2024 capital entitlement funds and \$480,000 in previous years unspent funds) in additional funding for the HSC project (not yet approved by Council but included in the AAP as a place holder). However, funding for the HSC project has not yet been fully secured. Due to the federal timeliness requirements set by HUD, the City must spend over \$2 million in CDBG funds by May 2026.

¹ The Homeless Solutions Center Project, located at 211, 233, and 333 S. Front Street and 10 E. Verdugo Avenue, consists of the proposed installation of 52 tiny home units, 17 SAFE parking spaces, and renovations to the existing structure to allow for case management and other similar services.

For these reasons, staff recommends transferring the previously committed CDBG funds of approximately \$1.6 million from the HSC project to the Buena Vista Homeless Access Center/HALA Headquarters Office project (BV)². The BV project, a partnership with Home Again Los Angeles, is currently funded and on schedule. A construction Request for Qualifications (RFQ) was issued in May 2025 and a Request for Proposals (RFP) will be offered in July 2025 with construction scheduled to begin late summer. Within this project are approximately \$1.6M in HOME Funds that could be used for either project. The BV project is expected to be under construction sooner and is therefore better positioned to meet this critical expenditure CDBG deadline. Reallocating funds to the BV project will help ensure compliance with HUD's timeliness standards while supporting a vital community initiative already progressing toward implementation. Staff will continue researching additional funding sources to supplement the needs of the HSC. Any funds remaining after the BV project is finished would be then used for the HSC.

The proposed transfer of funds from the HSC project to the BV project exceeds 10% of the City's CDBG entitlement allocation. As a result, this action must follow the SA process.

COMMUNITY OUTREACH

Community Outreach for the FY 2025-2029 Consolidated Plan and FY 2025-2029 Analysis of Impediments to Fair Housing Choice included an extensive community needs assessment process during the months of October and November 2024. Efforts included:

- Consolidated Plan Survey
 - Open from October 1, 2024 to November 15, 2024, in English, Spanish and Armenian
- Analysis of Impediments Survey
 - Open from October 15, 2024 to November 15, 2024, in English, Spanish and Armenian
- Survey was posted on the City website and notices were published in the newspaper
- Flyer with survey QR code was posted at City libraries and parks, and was distributed to non-profits
- Outreach meeting with non-profits held October 16, 2024
- Outreach meeting with City departments held October 22, 2024
- Community meetings held in person on November 12, 2024, at 1:00pm and virtually on November 14, 2024 at 6:00pm
- Launched a social media campaign via the City's Public Information Office with information on community meetings and the survey

² The Buena Vista Homeless Access Center/Home Again Los Angeles Headquarters Office project, located at 2244 N. Buena Vista Street, consists of four tiny home units for families, and renovations to the existing structure to allow for case management services.

Additionally, staff solicited public review and comment for the Consolidated Plan, AI, and SA for 30 calendar days. A notice for public comment was published in the Burbank Leader on April 26, 2025, and each document was available online via the City's website.

ENVIRONMENTAL REVIEW

The approval of each document is a funding mechanism only and is excluded from the definition of "project" pursuant to State California Environmental Quality Act (CEQA) Guidelines § 15378(b)(4). Pursuant to the terms of the contracts, appropriate environmental review of each funded activity will take place prior to commencement of any activity. Therefore, the action proposed herein will not have a significant effect on the environment and, hence, is not subject to CEQA. Even if it was a project, the action proposed herein is exempt from CEQA, pursuant to State CEQA Guidelines § 15061 (b)(3), the "common sense" provision of CEQA which applies to projects which may have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

FISCAL IMPACT

There is no fiscal impact to the general fund. The Consolidated Plan and AI are reports that have no monetary implications. Should Council approve the Substantial Amendment to the 2024-25 Annual Action Plan, existing funds will be transferred between projects within the CDBG Program.

CONCLUSION

To meet HUD guidelines relevant to the receipt of annual HOME and CDBG funding, staff is requesting Council's approval of the FY 2025-2029 Five-Year Consolidated Plan, the FY 2025-2029 Five-Year AI to Fair Housing Choice (required by HUD as a recipient of CDBG and HOME funding), and the SA to the 2024-2025 Annual Action Plan, which transfers \$1,671,978.95 of CDBG funds from Homeless Solutions Center Project to the Buena Vista Homeless Access Center/Home Again Los Angeles Headquarters Project.

ATTACHMENTS

Attachment 1 – Resolution

Attachment 2 – 2025-2029 Consolidated Plan

Attachment 3 – Consolidated Plan Needs Assessment Results Summary

Attachment 4 – FY 2025-2029 Analysis of Impediments to Fair Housing Choice (AI)

Attachment 5 – Analysis of Impediments Survey Results

Attachment 6 – Substantial Amendment – Redlined 2024/25 Annual Action Plan