

## Annual Action Plan

### Executive Summary (ES-05)

#### 1. Introduction

The City of Burbank Annual Action Plan (Action Plan) for Fiscal Year (FY) 2024-25 covers the fifth 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 2024-25 in order for the City to continue to receive Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) Program funding.

#### Funding Decisions

The funding methodology for the FY 2024-25 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. Except for 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 2024-25 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 30 calendar days; and
- Held an agenzized, public meeting on June 25, 2024, for the Annual Action Plan for Fiscal Year 2024-25 at the Burbank City Council.

### **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 2023-24 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 2023-24 prior to September 30, 2024. 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 expected that the City of Burbank will receive \$13,119,924 in federal funding for FY 2024-25 to address goals and objectives of City's Consolidated Plan. The amount includes Section 8 Housing Choice Voucher Program renewal funding of \$11,000,000, Continuum of Care Funding for chronically homeless persons of \$567,848 CDBG Funds totaling \$1,064,583, and \$487,493 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 2024-25 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.
- Implement the City's 2022-2027 Homelessness Plan

## 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 an 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;
- Provide capacity building and technical assistance to homeless service providers; and
- Implement the City's Homelessness strategies as described in the five-year (2022-2027) Homelessness Plan.

## 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
<b>CDBG</b>	Public-federal	Administration; capital projects; economic development and public services	\$1,064,583	\$0	\$1,064,583	The FY 2024-25 projected allocation for projects and programs are as follows: administration (20%); public services (15%); and capital/economic development (65%).
<b>HOME</b>	Public-federal	Administration Acquisition and rehabilitation of multi-family units to create permanent affordable rental housing	\$487,493		\$487,493	FY 2024-25 allocation for affordable housing activities and program administration.
<b>Section 8 Housing Choice Voucher</b>	Public-federal	Rental Assistance only	\$11,000,000		11,000,000	Section 8 Housing Choice Vouchers provide rental subsidies to extremely low income individuals and

						families from the Housing Authority's waiting list.
<b>Special Needs Assistance Program</b>	Continuum of Care	Rental Assistance, Administration , Supportive Services	\$567,848		\$567,848	The Permanent Supportive Housing Vouchers will provide rental assistance to individuals and families who meet the definition of chronic homelessness
					<b>\$13,119,924</b>	

**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:

<b>Federal, State and Private Resources Available for Housing and Community Development Activities Competitive Programs</b>		
<b>Program</b>	<b>Description</b>	<b>Eligible Activities</b>
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 Supportive Housing	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

<b>Table 5 (continued)</b> <b>Federal, State and Private Resources Available for</b> <b>Housing and Community Development Activities</b> <b>Competitive Programs</b>		
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 2024-25, the City will consider competing for federal, state and private resources available for housing and community development opportunities listed above.

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

1. The City has begun the process of identifying City owned land and other potential land within City boundaries for the purpose of addressing affordable housing and homelessness per the needs in the City’s five-year Consolidated Plan for Fiscal Year 2020-2025. As such, a City-owned facility was identified for use as a homeless solutions center and transitional housing site for unhoused families. The property is a non-residential building located at 323-333 S. Front Street, Burbank, CA 91502. The property is currently vacant and in need of rehabilitation and currently has one tenant who will be moving out in September 2024. City staff is still in the very early stages of assessing the property and developing a rehabilitation plan. On April 9, 2024, City Council approved the declaration of a shelter crisis pursuant to SB 850 (Chapter 48, Statutes of 2018 and Government Codes § 8698.1, § 8698.2, and § 8698.4) to the Los Angeles Continuum of Care. In addition, City Council approved the development of a Homeless Solutions Center at the property located at 323-333 South Front Street and 10 East Verdugo Avenue, Burbank. The proposed plan for the Homeless Solutions Center would include approximately 26 tiny home units to house approximately 49 beds, including Americans with Disabilities (ADA) compliant single-unit beds; storage via The SAFE for both transitional housing residents and non-residents; caseworker and security office, reception area, and dining/day use area; and 14 non-RV Safe Parking spots (two ADA compliant) and nine staff parking spaces. The next steps for the project include Planning and Building Code requirements, outreach, and funding. City Council approved requesting \$3,450,000 from the Burbank-Glendale-Pasadena Regional Housing Trust to help develop the project.

**Discussion**

Please see the narrative above for discussion.

**AP-21 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	2024	2025	Housing	Focus Neighborhood	Housing	HOME: \$487,493	Units created
2	Economic Development	2024	2025	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: 0	people assisted

3	Homelessness	2024	2025	Housing	City-wide	Low to Moderate Income Benefit	CDBG: \$113,014	people assisted
4	Community Facilities	2024	2025	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: 0	people assisted
5	Infrastructures	2024	2025	Non-Housing	Low Income Neighborhoods	Low to Moderate Income Benefit	CDBG: \$0	people assisted
6	Public Services	2024	2025	Non-Housing	City-wide	Low to Moderate Income Benefit	CDBG: 40,083	people assisted
7	Administration	2023	2024	Non-Housing	n/a	n/a	CDBG: \$212,91 HOME:\$48,749.30	n/a

**Table 2 – Goals Summary**

**Goals Description**

	<b>Goal</b>	<b>Outcome Indicators</b>	<b>Outcome Unit of Measure (2020-2025)</b>	<b>Outcome Expected (Annually)</b>
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,	Total Person Assisted 3,000	600 unduplicated people

		disabled, and health services		
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	Armenian Relief Society...Community Social Services Program
2	Boys & Girls Club...Afterschool & Summer Program Scholarships
3	Burbank Coordinating Council...Camperships
4	Burbank Noon Lions...Indigent Eye Care & Ear of the Lion
5	Burbank Temporary Aid Center...Burbank Temporary Aid Center (Public Service)
6	Family Service Agency...Residential Therapeutic Care for Special Homeless
7	Home Again LA...Homeless Outreach Services

8	Upwards... BOOST (economic development)
9	CDBG Administration
10	HOME Administration

**Table 3 – Project Information**

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

The FY 2024-25 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. The City of Burbank will reevaluate the unmet housing needs in the new Consolidated Plan. Finally, the funding priorities include input from various institutions, nonprofits, businesses, and residents.

**AP-38 Project Summary**

**Project Summary Information**

1	Project Name	Burbank Temporary Aid Center -Burbank Temporary Aid Center
	Target Area	Homeless and At-Risk
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Approved Funding	CDBG: \$68,500
	Description	Providing rental assistance, utility assistance, food pantry, reimbursement of operating showers and laundry (utility costs)
	Target Date	7/1/2024
	Estimate the number and type of families that	350 unduplicated low-income residents served

	will benefit from the proposed activities	
	Location Description	1308 W. Burbank Blvd, Burbank CA 91506
	Planned Activities	Emergency service provisions
2	<b>Project Name</b>	Boys and Girls Club – Afterschool Scholarships
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Youth programs
	Approved Funding	CDBG: \$15,000
	Description	Providing afterschool and summer educational programs
	Target Date	7/01/2024
	Estimate the number and type of families that will benefit from the proposed activities	The Club will serve a minimum of 40 youth who qualify as extremely low-income using HUD guidelines.
	Location Description	300 E Angeleno Avenue, Burbank, CA 91502
	Planned Activities	Youth services
3	<b>Project Name</b>	Burbank Noon Lions – Indigent Eye Care & Ear of the Lion
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Health services
	Approved Funding	CDBG: \$4,983
	Description	Providing free and low-cost vision and hearing screenings and equipment/materials
	Target Date	7/1/2024
	Estimate the number and type of families that will benefit from the proposed activities	32 unduplicated low-income clients
	Location Description	Citywide

	Planned Activities	Professional screening reimbursements, purchase of prescription glasses, and refurbishment of hearing aids
4	Project Name	Armenian Relief Society – Community Social Services Program
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Senior services
	Approved Funding	CDBG: \$51,604
	Description	Low-income clients will receive employment services, case management, housing navigation, supportive services to seniors and people experiencing homelessness
	Target Date	7/1/2024
	Estimate the number and type of families that will benefit from the proposed activities	290 unduplicated clients to be served
	Location Description	517 W. Glenoaks Blvd, Glendale CA 91202
	Planned Activities	Case management, housing placement, life skills
5	Project Name	Family Service Agency – Residential Therapeutic Care for Special Homeless
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Approved Funding	CDBG: \$40,000
	Description	Providing low-income households with temporary emergency assistance, furnishings, security deposits for those participating in transitional housing operated by Family Service Agency
	Target Date	7/1/2024
	Estimate the number and type of families that will benefit from the proposed activities	5 total families served and moving into permanent housing

	Location Description	2721 W. Burbank Scattered sites
	Planned Activities	Rental assistance and case management
6	Project Name	Burbank Coordinating Council – Camperships
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Youth Services
	Funding Request	CDBG: \$20,800
	Description	Provide a week of resident or virtual camps for children ages 7 – 18 years of age from low-income families.
	Target Date	7/1/24
	Estimate the number and type of families that will benefit from the proposed activities	60 children from low-income families to be served
	Location Description	Scattered sites
	Planned Activities	Financial assistance to low-income households.
7	Project Name	Home Again LA – Homeless Outreach Services
	Target Area	Citywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding Request	CDBG: \$43,000
	Description	Provide outreach and case management to families with minor children
	Target Date	7/1/2024
	Estimate the number and type of families that will benefit from the proposed activities	50 homeless households.
	Location Description	Citywide
	Planned Activities	Staffing a community integration specialist.

8	Project Name	Upwards- BOOST
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Youth Services
	Funding Request	CDBG: \$152,000
	Description	To provide business and technical support for licensed in-home daycare providers in Burbank
	Target Date:	7/1/2024
	Estimate the number and type of families that will benefit from the proposed activities	26 licensed om-home daycare providers in Burbank
	Location Description	5521 N. University Drive Suite 104, Coral Springs, CA 33067
	Planned Activities	Create sustainability for low-and moderate income licensed in-home daycare providers in Burbank
9 & 10	Project Name	CDBG and HOME Administration
	Target Area	n/a
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding Request	CDBG: \$212,916 HOME: \$48,749.30
	Description	Utilization of 20% cap for CDBG administration and 10% cap for HOME
	Target Date	7/1/2024
	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 2024-25 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)	<b>HOME 100%</b>
Preserve Affordable Rental Housing	<b>Section 8: 100%</b>
Community Facilities/Infrastructure Improvements/Economic Development	<b>CDBG: 65%</b>
Youth Services	<b>CDBG: 15%</b>
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 2024-2025. 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, childcare, 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.

<b>One Year Goals for the Number of Households to be Supported</b>
Homeless : 67
Non-Homeless: 900
Special-Needs: 35
Total : 1,002

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

<b>One Year Goals for the Number of Households Supported Through</b>
Rental Assistance: 1,002 (based on FY 2024-25 renewal funding & new Permanent Supportive Housing vouchers)

The Production of New Units: 0
Rehab of Existing Units: 0
Acquisition of Existing Units: 0
Total: 1,002

**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**

Burbank's homeless population is primarily individual males between the ages of 18-44 years of age according to the 2023 Homeless Count. Older adults aged 65 and above totaled 22. The number of families experiencing homelessness counted in the 2023 was 25. It's challenging to really understand how many older adults and families are impacted by homelessness because their experiences are not as visible as those represented in the 2023 Homeless Count. We believe that many older adults and families who are unhoused or at-risk of homelessness are not counted and are not connected to programs. Therefore, many do not know where to turn to access help. The City will take proactive actions to increase public awareness and engagement with people who are unhoused.

**Street Outreach:** A component of the City's efforts to reach out to homeless persons involves a year-round Burbank Street Outreach Program for adults and families. 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 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 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.

**Emergency Housing Vouchers:** In December 2021, the Burbank Housing Authority Board approved the administration of new vouchers made available through the American Rescue Plan Act (ARPA). These emergency housing vouchers are specific to homeless households; households at-risk of homelessness; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and recently homeless households. The Burbank Housing Authority was allocated 67 vouchers. All 67 vouchers were issued, and 61 participants have been housed. The remaining six participants are still looking for a unit.

**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, BHMET 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 2024, Burbank participated in the annual Greater Los Angeles Point-In Time Count (PIC) for the LA CoC. Data collected from the 2024 PIC will be available by July 2024.

### **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, various winter shelter beds in Los Angeles County/City are available to Burbank homeless from December 1<sup>st</sup> through March 31<sup>st</sup>. The City of Burbank provides transportation assistance to the shelter.

In addition, Home Again Los Angeles (HALA), a non-profit organization, serves various segments of the homeless population by providing emergency shelter and supportive services. HALA performs a highly effective, sustainable and expandable service delivery drawing on resources of the faith community, churches, synagogues, mosques, and temples. The main components of the program are outreach and screening, transitional housing, rapid rehousing, 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 19 transitional and permanent supportive housing units which consist of 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). BHC plans to include an additional 10 units, or more, in a proposed project on Fairview Steet during the next Consolidated Plan cycle.

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, however, it 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 annually renews 20 Permanent Supportive Housing Vouchers with the U.S. Department of Housing and Urban Development and 10 Veteran Affairs Supportive Housing vouchers with the U.S. Department of Veteran Affairs.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) assist 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 to 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**

Diversions 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 April 2023, the City of Burbank adopted a five-year (2022-2027) 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 2024-25, 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).

**Rapid Rehousing:** For multiple consecutive years, the City of Burbank has assisted a household that is unhoused as defined by HUD with a 6-month rent subsidy and case

management program. The program is operated by Home Again Los Angeles and is a resource for Burbank, including the Service Planning Area 2.

**Case Management Program:** Homeless individuals or families and those at-risk of homelessness have the opportunity to voluntarily participate in Case Management provided by various service providers serving the City of Burbank. Those agencies include Streetplus, HALA, Burbank Temporary Aid Center, A wrap-around mobile case manager with North Hollywood Home Alliance, and many more.

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 skilled 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 several 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 to address the increasing number of homeless in Burbank and their service needs.

- Capacity
- Advocacy
- Access, Outreach & Engagement
- Shelter & Housing Accessibility
- Health & Stabilization
- Homelessness Prevention

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 continue to address several of the challenges facing people experiencing homelessness.

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 before 2035, 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. Furthermore, the sixth cycle Regional Housing Needs Assessment (RHNA) allocation for the City of Burbank is 8,772 new homes throughout the planning period of October 2021 through October 2029. Additionally, the City must plan for a sufficient "buffer" of new housing units beyond the required RHNA to offset any sites that are developed at a lower density or lesser affordability than assumed in the Housing Element sites inventory. The City Council adopted the sixth cycle Housing Element for 2021-2029 planning period in September of 2022 that requires the City to plan for development of 8,772 units by zoning adequate sites for housing and removing governmental constraints to development of housing. The City's RHNA projection is consistent with the Council's goal to produce 12,000 new units between 2019-2034.

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 Burbank2035 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. To accommodate needed housing while preserving existing neighborhoods and hillside areas, Burbank2035 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 sixth cycle Housing Element identifies nineteen opportunity sites to accommodate the projected growth in housing needed to meet the City's RHNA allocation for the 2021-2029 planning period. Twelve of the opportunity sites are in the Downtown Transit Oriented Development Specific Plan area and seven opportunity sites are in the Golden State Specific Plan (GGSP) area. The opportunity sites are located near the City's major employment and transit hubs. Additionally, Media District Specific Plan (MDSP), which is currently underway provides for additional sites for housing development near high quality transit stations.

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 2024-25.

**Actions planned to address obstacles to meeting underserved needs**

During FY 2024-25, the City will seek new funding opportunities to support the approved projects and programs related to housing and serving low and moderate-income persons.

**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 2024-25, 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 regard 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 2024-25.

**Discussion:**

Please see above.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(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, 2024 to June 30, 2025. The estimated CDBG entitlement allocation is \$1,064,583 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(I)(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 2024-25 is \$0
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.
<b>Total Program Income</b>	<b>\$0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	The City's CDBG Program will not have activities to fund for FY 2024-25 under urgent needs.

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(I)(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 are, 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*