



City of Salinas

FY 2020 – FY 2021 Annual Action Plan

(July 1, 2020 through June 30, 2021)

City of Salinas
Community Development Department, Housing Division
65 W. Alisal Ave.
Salinas, CA 93901
(831) 758-7334

Expected Resources

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

Introduction

The City is an entitlement jurisdiction for CDBG, HOME, and ESG funds, and anticipates receiving \$2,024,219 in CDBG funds, \$803,851 in HOME funds, and \$179,001 in ESG funds for FY 2020-2021. In addition, the CDBG program anticipates Program Income (PI) of \$50,000 and the HOME program anticipates PI of \$552,868. Specifically, the City anticipates receiving \$94,000 in repayments from its Residential Rehabilitation Loan Program, and a payment of \$458,868 from the multi-family Los Padres Apartment’s loan payoff. The CDBG PI and HOME PI will be incorporated into the City's annual budgeting process.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,024,219	50,000	0	2,074,219	8,000,000	For planning purposes, the City estimates the availability of approximately \$2 million annually in CDBG funds for the remaining four years of the CP period.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	803,851	552,868	0	1,356,719	3,200,000	For planning purposes, the City estimates the availability of approximately \$800,000 in HOME funds annually for the remaining four years of the CP period.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	179,001	0	0	179,001	720,000	For planning purposes, the City estimates the availability of approximately \$180,000 in ESG funds annually for the remaining four years of the CP period

Table 1 - Expected Resources – Priority Table

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

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 is working on establishing several new public/community facilities on City-owned properties:

Chinatown Navigation Center (CNC)

The City purchased the property located at 10-12 Soledad Street in the Chinatown neighborhood using SRA funds for a future use to be determined. This site was originally intended for a Homeless Services Facility. However, due to other needs in the community, the location of the proposed Homeless Services Facility was moved from 10-12 Soledad St. to a property leased by the City at 115-125 E. Lake Street and the project, renamed as the Chinatown Navigation Center (CNC), is being funded through multiple funding sources including HCD CESH, HCD ESG, HUD ESG and City General Fund. The services intended for the homeless in this facility include restrooms, showers and access to CHS and other supportive services staff who can conduct outreach to facilitate the needs of individuals requesting services. Currently, the CNC building has the capacity for up to fifteen (15) beds for adult homeless individuals. In an effort to expand CNC bed capacity, the City was awarded and donated five (5) trailers through Governor Gavin Newsom's Office which will increase bed capacity by an additional 20 beds. The trailers are in the process of being installed and anticipated to be set-up and operational by August 2020. Furthermore, the City recently purchased a Sprung Structure to increase bed capacity by an additional fifty (50) beds at the CNC site. The Sprung Structure is anticipated to be installed, set-up and operational by September 2020.

1081 Buckhorn Drive

The City purchased 1081 Buckhorn Drive with HUD Economic Development Initiatives (EDI) funds with the specific objective to develop a childcare center. This 0.8-acre property is located immediately outside of the ANRSA; it is expected that this childcare center would primarily serve Alisal residents. The City is working with the Alisal Union School District (AUSD) to develop the site for the District's Early Childhood (Preschool) and Day Care programs. The City took the Exclusive Negotiating Rights Agreement (ENRA) to City Council on August 15, 2017. The City and AUSD have entered into an ENRA extension to allow the AUSD to continue its due diligence process on the property. The AUSD continues its public engagement process to include various stakeholders to determine future programming and funding for the center. The United Way is leading the public engagement process on behalf of AUSD. The AUSD is also fundraising to ensure the facility will be built as planned. The estimated construction start date is proposed to begin in 2020.

10-12 Soledad Street

The City also owns 10-12 Soledad Street, which is currently being used to provide additional parking for

CNC staff. Future uses have yet to be determined.

Discussion

Annual Goals and Objectives

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	Increased Decent and Affordable Housing	2020	2024	Affordable Housing	Alisal Neighborhood Revitalization Strategy Area Chinatown Area 2020	Affordable Rental Housing Opportunities Assistance to Homeowners for Rehabilitation	CDBG: \$55,000 HOME: \$1,100,471	Rental units constructed: 6 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit
2	Enhanced Homeless Facilities and Services	2020	2024	Homeless	Chinatown Area 2020	Enhanced Homeless Prevention, Services, and Facili	ESG: \$165,576	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted Homeless Person Overnight Shelter: 225 Persons Assisted Homelessness Prevention: 5 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Enhanced Neighborhood Conditions	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Alisal Neighborhood Revitalization Strategy Area Chinatown Area 2020	Public Services Public Facilities and Infrastructure Improvements Economic Development	CDBG: \$1,604,376	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 50000 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Businesses assisted: 5 Businesses Assisted
4	Planning and Program Administration	2020	2024	Planning and Administration		Planning and Administration	CDBG: \$414,843 HOME: \$339,179 ESG: \$13,425	

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Increased Decent and Affordable Housing
	Goal Description	The City will pursue a range of activities to expand affordable housing opportunities for low- and moderate-income households, including those with special needs (seniors, large households, farmworkers, disabled, homeless, etc.) Emphasis will be on affordable rental housing due to funding limitations and urgency of needs. The City will actively pursue opportunities through new construction, rehabilitation, acquisition/rehabilitation, and preservation. In addition, the City will continue to provide assistance to individual homeowners to make necessary repairs, code corrections, energy conservation features, and accessibility improvements.
2	Goal Name	Enhanced Homeless Facilities and Services
	Goal Description	The City will utilize both ESG and CDBG funds to coordinate services and facilities for the homeless, with focused efforts in the Chinatown area. The City's strategy for addressing homeless needs is three-pronged: 1) homeless prevention; 2) homeless services; and 3) homeless facilities. The intent is to reduce the risk of homelessness, and address the needs of those rendered homeless using a continuum of care approach by supporting services and facilities that complement the existing Continuum of Care system.
3	Goal Name	Enhanced Neighborhood Conditions
	Goal Description	The City will provide a range of community development activities, including community and supportive services, expansion/improvement to community facilities and infrastructure, and economic development activities. The City will coordinate services and improvements in a manner that concentrate investments in specific neighborhoods in order to provide more lasting and impactful improvements.
4	Goal Name	Planning and Program Administration
	Goal Description	The City will continue to implement the CDBG, HOME, and ESG programs in compliance with all applicable regulations and requirements. The caps for program administration costs (20 percent for CDBG, 10 percent for HOME, and 7.5 percent for ESG) do not provide adequate funds to perform all the general planning, program implementation, reporting, and monitoring functions required by these programs. Therefore, as allowed by HUD, the City allocates a portion of the activity funding to delivery costs that are directly associated with implementation of specific activities or programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

During FY 2020-2021, the City will pursue a range of housing and community development activities using CDBG, HOME, and ESG funds.

Projects

#	Project Name
1	Housing Services Program
2	MCHADC Parkside Apartments
3	Affordable Housing Project - TBD
4	Interim, Inc. Sun Rose Apartments
5	Sherwood Recreation Center
6	Girl Scouts of California - Alisal Program Center
7	Grow Salinas Fund
8	HOME Program Planning and Administration
9	ESG SALINAS Projects and Administration
10	CDBG Program Planning and Administration

Table 3 - Project Information

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

Inadequate funding is the most significant obstacle for serving the underserved needs. The extent of needs in Salinas far exceeds the available funding from the CDBG, HOME, and ESG programs.

Most activities to be pursued by the City with CDBG, HOME, and ESG funds will be leveraged with a variety of funding sources, including: grants from State, Federal, and local governments; private foundations; capital development funds; general funds; private donations of funds or services; and other various funding sources. For the provision of affordable housing, the City partners with non-profit housing developers such as MidPen, CHISPA, and MCHADC, which all utilize a multi-layer approach to funding affordable housing.

The HOME program requires that for every HOME dollar spent, the local jurisdiction must provide a 25 percent match with non-federal dollars. However, given the distressed conditions in Salinas, the City consistently receives a 50 percent reduction in the match requirements. HUD approved the HOME wavier which includes the CHDO set aside requirement. However, the City intends to allocate a

minimum of 15% to MCHDA as a CHDO anyhow.

Given the limited annual allocations in CDBG funds, the City may pursue the use of the Section 108 loan guarantee within the five-year CP period in order to support large-scale projects.

AP-38 Project Summary
Project Summary Information

1	Project Name	Housing Services Program
	Target Area	
	Goals Supported	Increased Decent and Affordable Housing
	Needs Addressed	Assistance to Homeowners for Rehabilitation
	Funding	CDBG: \$55,000
	Description	The project includes the various components of the City's housing rehabilitation activities, including the Housing Rehabilitation Program, Housing Accessibility Assistance, Emergency Repairs, and Lead-Based Paint Abatement. Budget for this project includes \$5,000 of program delivery costs. For the Housing Rehabilitation Program, loans are only available to qualifying low-income households with eligible properties. Property improvements funded by these loans must be located within the Salinas City limits. For the Housing Accessibility Assistance (HAA), grants are available to assist qualifying property owners to remove architectural barriers which limit access or impede mobility, as well as to install fixtures which may reduce hazards aggravated by a disability. This program is not centered around LBP activities, rather LBP is a sub-component of the Rehab and Housing Accessibility Assistance program. Matrix Code: 14ANational Objective: LMHPresumed Benefit: No
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	An estimated five households may benefit from the various housing rehabilitation activities.
	Location Description	This program is available to all eligible households citywide, and is administered by the Housing Division of the Community Development Department located at 65 W. Alisal Street, Salinas. Program is available citywide.
Planned Activities	Single family rehabilitation of five (5) single family homes and program delivery. Program delivery involves various activities, including marketing, processing of applications, review and approval of work orders, monitoring of the construction work, and inspection for compliance with codes.	
2	Project Name	MCHADC Parkside Apartments
	Target Area	

	Goals Supported	Increased Decent and Affordable Housing
	Needs Addressed	Affordable Rental Housing Opportunities
	Funding	HOME: \$660,000
	Description	The Parkside Phase 1 Apartments will be a newly constructed 80-unit affordable housing project targeting senior households (62+). Phase 1 will be the first of two phases to replace the 80 deteriorated units existing on the site. The project will target households with incomes between with incomes between 0-60 percent of AMI; all units will be rental assisted through Section 8 project-based vouchers. The completed project will consist of 2 four-story buildings with a unit mix of 72 one-bedroom units with 677 square feet and 7 two-bedroom units with 1,071 square feet; one additional two-bedroom unit will be designated for on-site management. The HOME underwriting and subsidy layering analysis was currently in process as of September 2020. Monterey County Housing Authority Development Corporation (MCHADC) is a CHDO.
	Target Date	12/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	Of the 80 units in the project, six to eight units will be HOME funded.
	Location Description	1112 Parkside Street, Salinas The project is not located within a target area but is within City limits.
	Planned Activities	Phase 1 represents the demolition of the existing the existing deteriorated units on site and the construction of 80 replacement units.
3	Project Name	Affordable Housing Project - TBD
	Target Area	
	Goals Supported	Increased Decent and Affordable Housing
	Needs Addressed	Affordable Rental Housing Opportunities
	Funding	HOME: \$357,540
	Description	The City will pursue other affordable housing project(s) in the upcoming year.
	Target Date	12/31/2023

	Estimate the number and type of families that will benefit from the proposed activities	To be determined
	Location Description	The project is not located within a target area but is within City limits.
	Planned Activities	To be determined
4	Project Name	Interim, Inc. Sun Rose Apartments
	Target Area	
	Goals Supported	Enhanced Neighborhood Conditions
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$547,860
	Description	Interim, Inc. in collaboration with Monterey County Behavioral Health will develop property currently owned by Interim at 439 Soledad Street as supportive housing for very low-income adults with mental illness. The project, to be named Sun Rose Apartments, will provide a total of 11 Units: One eight-bedroom unit will be transitional housing for eight residents who are homeless or at-risk of homelessness, who have psychiatric disabilities, and who are enrolled in a full-service partnership under the MCHOME program, a collaborative of Interim and MCBHB that provides outreach and intensive integrated services and housing for homeless adults. Nine units will be permanent supportive housing for very low-income adults with psychiatric disabilities who are homeless, chronically homeless, or at-risk of chronic homelessness. Seven of the nine units will be 1-bedroom apartments that will house one person each. Two of the nine units will be studio apartments that house one person each. The nine units will be regulated under NPLH. One unit will be a studio apartment to house a resident manager. The eight-bedroom transitional facility will be funded with CDBG and other funds. This funding level includes \$47,860 for program delivery. Matrix Code: 03C National Objective: LMCPresumed Benefit: Yes
	Target Date	12/31/2022

	Estimate the number and type of families that will benefit from the proposed activities	One public facility adding eight shelter beds.
	Location Description	439 Soledad Street, Salinas The project is not located within a target area but is within City limits.
	Planned Activities	Demolition of existing 8-bedroom unit on site and reconstruct new facility.
5	Project Name	Sherwood Recreation Center
	Target Area	
	Goals Supported	Enhanced Neighborhood Conditions
	Needs Addressed	Public Facilities and Infrastructure Improvements
	Funding	CDBG: \$798,633
	Description	Funds will be used to provide Phase IV improvements and rehabilitation to the Sherwood Recreation Center. Budget for this project includes \$70,000 of program delivery costs. Matrix Code: 03FNational Objective: LMAPresumed Benefit: No
	Target Date	12/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	This project would benefit the 50,000 low/moderate income persons citywide.
	Location Description	Sherwood Recreation Center is located at 920 N. Main Street, Salinas The project is not located within a target area but is within City limits.
	Planned Activities	Phase IV involves the completion of the multi-phase community recreation center project.
6	Project Name	Girl Scouts of California - Alisal Program Center
	Target Area	Alisal Neighborhood Revitalization Strategy Area
	Goals Supported	Enhanced Neighborhood Conditions
	Needs Addressed	Public Services
	Funding	CDBG: \$35,000

	Description	The East Salinas Program Center helps girls develop critical skills and traits such as self-confidence, sound decision-making skills, self-efficacy, and stronger ties to their community, and fostering concepts such as caring, equality, social justice, responsibility and restraint. These critical skills/traits are linked to resiliency in at-risk youth populations, providing children the tools they need to be resilient to gangs, potential youth violence, and crime. Matrix Code: 05DNational Objective: LMCPresumed Benefit: No
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	This program anticipates assisting 200 girls in the Alisal neighborhood.
	Location Description	The Girl Scouts Alisal Program Center at 345 Towt Street in East Salinas (typically operating M-F 3 pm to 6pm during the school year, and M-F 8am-6pm during the summer).
	Planned Activities	The East Salinas Program Center provides these girls opportunities afforded girls in more advantaged communities—the opportunity to develop long-term relationships (for some girls over five years) with positive adult role models/mentors and peers, access to new learning and extra-curricular opportunities, and a strong focus on asset building, enabling girls to explore their strengths and develop their confidence and skills through a myriad of hands-on, learning-by-doing projects in areas such as science, environmental conservation, arts and crafts, and healthy cooking. Integrating the computer lab into these learning opportunities and experiences enables girls to explore, connect, and supplement learning by virtual means – promoting critical technical literacy skills.
7	Project Name	Grow Salinas Fund
	Target Area	Alisal Neighborhood Revitalization Strategy Area
	Goals Supported	Enhanced Neighborhood Conditions
	Needs Addressed	Economic Development
	Funding	CDBG: \$222,883

	Description	The Grow Salinas Fund continues to support small businesses in the community by providing them with low interest loans to help them expand and grow their businesses. This funding leverages SBA7 Lending program through Grow America Fund administered by NDC. \$202,621 will be used for either loans or grant for direct assistance to businesses, the remaining \$20,262 will be used for Activity Delivery. Matrix Code: 18A National Objective: LMA Presumed Benefit: No
	Target Date	12/31/2023
	Estimate the number and type of families that will benefit from the proposed activities	Five businesses will be assisted.
	Location Description	Alisal Neighborhood Revitalization Area (ANRSA)
	Planned Activities	No marketing activities will be associated with this activity. \$202,621 will be used for either loans or grant for direct assistance to businesses, the remaining \$20,262 will be used for Activity Delivery.
8	Project Name	HOME Program Planning and Administration
	Target Area	
	Goals Supported	Planning and Program Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: \$339,179
	Description	The City received approval from HUD to use the CARES Act waiver in order to increase the allowable HOME admin cap from 10 percent to 25 percent (\$200,962) for FY 2020. In addition, the City is allocating 25 percent (\$138,217) from the program income received. This line item will provide for the planning and administration activities to implement the City's HOME program.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The delivery of the City's various HOME-funded programs and activities will benefit the City's low and moderate income persons and those with special needs

	Location Description	The HOME program is administered by the Housing Division of the Community and Economic Development Department.
	Planned Activities	The City will perform all planning, administration, monitoring, and review functions in compliance with HUD regulations.
9	Project Name	ESG SALINAS Projects and Administration
	Target Area	
	Goals Supported	Enhanced Homeless Facilities and Services Planning and Program Administration
	Needs Addressed	Enhanced Homeless Prevention, Services, and Facili Planning and Administration
	Funding	ESG: \$179,001
	Description	The ESG Program will involve a range of activities to address homelessness. These include the provision of outreach, shelters, prevention, rapid re-housing, and HMIS services.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	The agencies funded anticipate providing assistance to homeless and at-risk homeless persons as follows: <ul style="list-style-type: none"> • City – 50 persons with outreach activities (\$76,000); HMIS (\$3,000); and program administration (\$13,425) • Community Homeless Solutions Warming Shelter – 225 homeless persons assisted (\$31,400) • Central Coast Center for Independent Living – 5 persons with homeless prevention (\$7,000) and 10 persons for rapid rehousing (\$47,676); and HMIS (\$500)
	Location Description	The City's homeless programs are being delivered by multiple agencies to assist the homeless families and individuals citywide.
Planned Activities	The following activities are planned: <ul style="list-style-type: none"> • Community Homeless Solutions Warming Shelter • Central Coast Center for Independent Living – Homeless Prevention; Rapid Re-Housing; and HMIS • City – Homeless outreach and ESG Administration (7.5 percent) 	
10	Project Name	CDBG Program Planning and Administration
	Target Area	

Goals Supported	Planning and Program Administration
Needs Addressed	Planning and Administration
Funding	CDBG: \$414,843
Description	This line item is to provide for the general program planning and administration of the CDBG program
Target Date	6/30/2023
Estimate the number and type of families that will benefit from the proposed activities	The delivery of various CDBG-funded programs and activities will benefit low and moderate income persons in the City, along with persons with special needs, such as the youth, homeless, elderly, and disabled.
Location Description	The CDBG program is administered by the Housing Division of the Community and Economic Development Department located at 65 West Alisal Street, Salinas.
Planned Activities	The City will perform all program planning, administration, monitoring, and review functions in compliance with HUD regulations.

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's strategy is to focus its investment in a most impactful manner by providing significant investments in two target areas, the ANRSA and Chinatown. Specifically, the City has designated the Alisal as a Neighborhood Revitalization Strategy Area (NRSA). In addition, the Chinatown area is identified as a HUD Slum and Blight designated local target area, as it is currently isolated from the rest of the City and is seeing serious issues of homelessness, unreported violence and a high percentage of low- and moderate-income residents. Most public services are available to residents citywide. However, by nature and/or location of some of the activities/programs, youth from the ANRSA and Chinatown would benefit greatly from many of these programs.

Some programs/projects are not located in any target areas nor are they available Citywide so the geographic distribution of funds does not add up to 100%. Programs/projects that are not in target areas or available citywide are qualified by LMC so they are not required to be located in a target area.

Geographic Distribution

Target Area	Percentage of Funds
Alisal Neighborhood Revitalization Strategy Area	7
Chinatown Area 2020	0

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

These two areas represent the most distressed neighborhoods in the City. These areas have the highest concentration of poverty and substandard living conditions. The Alisal area includes some of the most distressed neighborhoods in Salinas. The area faces challenges such as inadequate public infrastructure, high levels of unemployment, high levels of poverty, and violent criminal activity. Within the ANRSA, 26 percent of all residents lives in poverty, a higher proportion than the City overall (19 percent). The two projects with targeted in the Alisal Neighborhood Revitalization Strategy Area are the Salinas Growth Fund (CDBG) and Girl Scouts-- Alisal Program Center (CDBG).

The 12 blocks that form the Chinatown area are located primarily within Census Tract 18.02 Block Group (BG) 2. This BG has a population of about 1,200, with 81 percent being low and moderate income.

Discussion

See discussions above.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Under the City's Affordable Housing Goal, the City proposes to pursue the following housing activities:

- Housing Rehabilitation Loans, LBP, Emergency Repairs and Housing Accessibility Assistance Grants (CDBG) - 5 households
- MCHADC – Parkside Apartments (HOME). The first phase is the construction of an 80-unit project for seniors (6 HOME-funded units, replacing the existing deteriorated units on site. Phase 2 will involve the construction of another 80 units.
- Central Coast Center for Independent Living (ESG) -10 persons for rapid rehousing

One Year Goals for the Number of Households to be Supported	
Homeless	10
Non-Homeless	5
Special-Needs	6
Total	21

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	10
The Production of New Units	6
Rehab of Existing Units	5
Acquisition of Existing Units	0
Total	21

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

Discussion

This summary includes only the uses of CDBG and HOME funds for the improvement and provision of long-term affordable housing. Temporary assistance through rapid rehousing (ESG funds) is also included under this summary.

AP-60 Public Housing – 91.220(h)

Introduction

HACM owns and manages 22 housing developments in Salinas (372 units). These developments were recently converted from Public Housing to Project-Based Rental Assistance. Nineteen of the 22 HACM housing complexes in Salinas are concentrated within the ANRSA.

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

The City is not directly involved in the planning and development of public housing in the City. Based on the current policy direction of HUD, no new public housing will be developed. However, the City works closely with MCHADC, developer arm of HACM to create affordable housing in the community. Specifically, for FY 2020-2021, the City is allocating \$660,000 in HOME toward the construction of Parkside Apartments.

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

HACM's Family Self-Sufficiency (FSS) program is designed to help families with an HCV establish a savings account and find stable employment. FSS is a Federal Government program that offers the opportunity of homeownership and other options to clients that successfully complete the five-year program. Programs and services through FSS may include career counseling, job training, credit counseling and homeownership preparation. The program helps prepare residents for HACM's Homeownership Program, allowing first-time homebuyers to use their HCV to help with monthly homeownership expenses.

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

Not applicable.

Discussion

See discussions above.

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

Introduction

The City proposes to utilize CDBG and ESG funds to provide assistance to the City's homeless and special needs populations:

Youth Services

- Girl Scouts of California - Alisal Program Center

Homeless:

- Interim, Inc. – Construction of Sun Rose Apartments as transitional housing for homeless persons with disabilities
- Community Homeless Solutions – Warming Shelter
- Central Coast Center for Independent Living – Rapid Re-Housing and Outreach

In addition, the City is using CDBG-CV and ESG-CV funds to support a range of services, such as the Monterey County Food Bank, Echo Fair Housing Services, and Downtown Streets Team (DST).

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

The City plans to implement outreach services with in-house staff. However as necessary staffing capacity and funding permits, the City may contract the outreach services with an outside agency.

The City provides ESG funding to CCCIL. The CCCIL provides short-term rental assistance, medium term rental assistance, case management, financial literacy/assistance, housing location services/housing navigation.

The DST also conducts outreach to recruit candidates for its program. Through employment training and other supportive services, the program aims to help homeless individuals gain self-sufficiency.

Addressing the emergency shelter and transitional housing needs of homeless persons

For the FY 2020-2021, the ESG program includes funding to support CHS to provide to provide nightly shelter and meals to up to 70 homeless persons, provide case management and behavioral health services to clients, and HMIS. In addition, the City will serve as the lead agency for the administration of

the HCD ESG and HCD CESH funds for the local CoC service area (Monterey and San Benito Counties). These include additional funding for the Salinas Warming Shelter and CNC operated by CHS, Interim Inc. MCHOME, and to CCCIL's rapid-rehousing and homeless prevention program.

Furthermore, FY 2020-2021 CDBG funds are allocated to Interim Inc. for the construction of a transitional housing facility for persons with disabilities.

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

The CCCIL program, funded with ESG funds, will include both homeless prevention and rapid rehousing services by providing rent subsidies to the recently homeless or those who are at risk of becoming homeless. This program will help prevent homelessness or shorten the period of time that individuals and families experience homelessness. ESG funds will also be provided to Interim, Inc. for outreach services. This program targets homeless persons with mental disabilities.

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.

Several agencies, such as the Natividad Medical Center and the Monterey County Family and Children's Services provide discharge planning and placement assistance. The Natividad Medical Center Mental Health Unit and Salinas Valley Memorial Hospital work with community agencies to assist in finding the appropriate level of care and housing. The Monterey County Family and Children's Services provides discharge planning and placement assistance to youth leaving foster care through a Transitional Independent Living Plan beginning when the youth turn 16 years old and every year thereafter. Interim, Inc. will provide street outreach services in Salinas. This agency can help connect persons/families in need with services available.

Discussion

See discussions above

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

Introduction:

The most critical barrier to affordable housing in Salinas is that the need for decent and affordable housing far exceeds the City's available resources. The City will continue to aggressively pursue funding available at the local, state, and federal levels to supplement its limited funds.

The City values its partnership with non-profit housing developers such as CHISPA, MidPen, and MCHADC in pursuing innovative strategies to addressing the City affordable housing needs, including providing more permanent housing options for the homeless.

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

The City's Inclusionary Housing Program can be an effective strategy for providing affordable housing in the community and also to help achieve the goal of de-concentrating affordable housing in the ANRSA, allowing residents other locational choices. The State of California also passed SB 329 in 2019, prohibiting housing discrimination against persons using public assistance (including Housing Choice Vouchers) to pay for housing. This source of income protection could potentially open up housing options for many of the City's low- and moderate-income households. The City has updated its Inclusionary Housing Ordinance to enhance the program's effectiveness. This update was completed in June 2017.

Discussion:

See discussions above.

AP-85 Other Actions – 91.220(k)

Introduction:

The extent of housing and community development needs in Salinas far exceeds the City's funding capacity. To utilize its limited funding in the most cost-effective manner, the City targets its investments in the most distressed neighborhoods in the community.

Actions planned to address obstacles to meeting underserved needs

The homeless are among the most underserved group in Salinas, with ESG funding at a level far below what is needed to address the City's homeless issues. In response, the City is taking the lead to coordinate additional ESG allocation from HCD ESG and HCD CESH programs for the CoC service area (Monterey and San Benito Counties). Additionally, the City is working closely together with the local CoC on a full comprehensive update of a Regional Monterey and San Benito Counties 10 yr. Plan to End Homelessness (Lead Me Home Plan). Through the DST, ESG-CV funds will be used to provide employment training for homeless individuals through neighborhood cleanup activities, and supportive services to help these individuals gain self-sufficiency. As CARES Act funding is exhausted in the future, CDBG annual allocations may be used to support the DST.

Actions planned to foster and maintain affordable housing

For FY 2020-2021, the City proposes to allocate \$660,000 to the MCHADC for the construction of the 80-unit Parkside Apartments (six to eight units will be HOME-funded). The City will continue to pursue other affordable housing projects with non-profit partners in the County.

CDBG funds will continue be used to support the City's Housing Rehabilitation, Emergency Repairs, Lead-Based Paint Reduction, and Housing Accessibility Assistance programs. In addition, CDBG funds will be allocated for the construction of a transitional housing facility (Sun Rose Apartments) by Interim, Inc.

Actions planned to reduce lead-based paint hazards

As required as a condition of receiving HUD funds, the City complies with HUD's Lead Safe Housing Regulation (Title 24, Part 35). Primary compliance is through City Housing Services Program staff. Potential project sites with housing units constructed prior to 1978 are tested by a certified lead inspection firm (for lead paint and, where applicable, for other possible materials containing lead, such as ceramic tiles). When found, lead remediation is performed by certified LBP contractors before the rehabilitation contractor is permitted to begin work. In addition, regardless of date-of-construction, rehabilitation sites are inspected for failing paint surfaces (chipping, flaking) during the initial rehabilitation evaluation. If such deteriorating paint is found, lead testing is performed and the necessary steps taken if lead is found. All general contractors involved in the Rehabilitation/Housing Accessibility Assistance grants have received their certification as an EPA Renovation, Repair and

Painting (RRP) contractor.

Lead-based paint testing, remediation and abatement activities are expensive. While such activities are eligible items for rehab loans, the cost was found to be a deterrent to potential rehab clients. The City therefore established a lead hazard grant program whereby rehabilitation clients are provided a grant sufficient to cover most -if not all- the costs of lead abatement. The lead testing and lead hazard grant policies also apply to participants in the Housing Accessibility Assistance (HAA) program, also administered by Housing Services.

Actions planned to reduce the number of poverty-level families

As a California municipality, the City has very limited control over the existence of poverty among its residents. Nevertheless, the City's actions – particularly with regard to the use of federal funds covered under this plan – can work to assist those households and individuals currently facing poverty. For FY 2020-2021, the City proposes to allocate CDBG funds to the GSF, which provides grants to support small businesses by providing low interest loans to help them expand and grow their businesses. This program will help provide employment opportunities for low- and moderate-income residents and increased income for small businesses.

Actions planned to develop institutional structure

The City collaborates with the County of Monterey and develops a joint funding application process/system to help reduce administrative works associated with funding application and reporting. Use of City Data Services allows for more efficient and accurate management of the funds.

The City has established a Housing and Land Use Committee to provide an additional forum for non-profits, stakeholders and members of the public to communicate directly with the City regarding housing and community development needs and plans for future projects. The Housing and Land Use Committee is tasked with the objective of enhancing coordination and improving the effectiveness and efficiency in the City utilizing its entitlement HUD funds. Specifically, the Housing and Land Use Committee services as the formal recommendation body to the City Council regarding housing related items.

The City has implemented a two-year funding cycle for CDBG and ESG public services along with a competitive funding application that would yield less administration effort by the City and non-profits and allow for funding to assist in serving more clients. The City will also continue to monitor and evaluate the changing needs within the City and how best to fund various agencies to assist the low-moderate income citizens with CDBG and ESG public services funds.

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

service agencies

The City partners with its strong network of public and private housing and social service agencies to provide housing and community development programs in the City. Coordination efforts are ongoing.

Discussion:

See discussions above.

Program Specific Requirements

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

Introduction:

This section addresses the regulatory requirements of the CDBG, HOME, and ESG programs not covered in the previous sections.

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	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.	0
3. The amount of surplus funds from urban renewal settlements	0
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	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

No other forms of HOME investments beyond those previously described.

2. 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:

The City suspended its First-Time Homebuyer Program in 2014. Existing loans will be subject to the City's recapture/resale provisions. Pursuant to HUD's HOME recapture regulations the City has chosen to recapture the entire principal loan balance (direct homebuyer subsidy) to the extent there are net proceeds after the sale of the home and repayments of the first mortgage and closing costs. This indebtedness is due and payable upon sale or transfer of the property, prior to the expiration of the period of affordability, to the extent there are sufficient "net proceeds". Net proceeds are defined as the amount of sale proceeds remaining (if any) after payment of any superior loan(s) (Other than HOME funds) and customary closing costs. If upon the voluntary or involuntary sale of the above named property prior to the expiration of the period of affordability there are insufficient net proceeds to pay the balance remaining of the First-Time Homebuyer Program, the homebuyer is relieved from any further obligation to pay the indebtedness.

3. 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:

The City suspended its First-Time Homebuyer Program in 2014. Existing loans will be subject to the City's recapture/resale provisions. Pursuant to HUD's HOME recapture regulations the City has chosen to recapture the entire principal loan balance (direct homebuyer subsidy) to the extent there are net proceeds after the sale of the home and repayments of the first mortgage and closing costs. This indebtedness is due and payable upon sale or transfer of the property, prior to the expiration of the period of affordability, to the extent there are sufficient "net proceeds". Net proceeds are defined as the amount of sale proceeds remaining (if any) after payment of any superior loan(s) (Other than HOME funds) and customary closing costs. If upon the voluntary or involuntary sale of the above named property prior to the expiration of the period of affordability there are insufficient net proceeds to pay the balance remaining of the First-Time Homebuyer Program, the homebuyer is relieved from any further obligation to pay the indebtedness.

4. 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 has no plan to use HOME funds to refinance existing debt.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

An initial evaluation to determine program eligibility of individuals and/or families will be conducted by the agencies/service providers. It will establish the kind and the amount of assistance needed. Evaluations will be conducted in accordance with the requirements set forth under §576.400(d) and the written standards established under §576.400(e).

Agencies/service providers will reassess the eligibility of individuals and/or families; the kind and amount of assistance needed for program participants receiving homelessness prevention services will be reassessed monthly and quarterly for program participants receiving rapid re-housing assistance. Each reassessment of eligibility will ascertain that:

- The program participant does not have an annual income that exceeds 30% of the median family income for the area, as determined by HUD;
- The program participant lacks sufficient resources and support network necessary to retain housing without ESG assistance.

In order to be funded with ESG funds, an agency/service provider is required to be a collaborative member of the CoC. This avoids duplication of services and allows a smooth transition and/ or delivery of services rendered. In addition, the collaborative further engage and coordinate resources to improve streamlining of current programs and funding strategies, and provide ongoing training as procedures and bylaws are ratified and refined.

The City will allow ESG-funded agencies that provide rapid re-housing and homelessness prevention services to determine the prioritization of eligible families. In addition, CHSP established basic registration and screening processes (intake, referral, eligibility, documentation verification, case notes, to name a few) that allow all agencies a more consistent determination on the initial risk assessment during the intake process.

ESG-funded agencies that provide rapid re-housing and homelessness prevention services may determine the share of rent and utilities costs that each participant must pay. However, if applicants show income, they must pay 30 percent of their adjusted monthly income towards rent.

ESG-funded agencies shall assist individuals and/or families for no more than 24 months, during any

3-year period – this in accordance with the general conditions under §576.103 and §576.104. Program participants receiving rapid re-housing assistance are required to be re-evaluated at least once every year and those receiving homeless prevention assistance must be re-evaluated at least once every three months. As mandated by HUD, all program participants receiving project-based rental assistance must have a lease that is for a period of one year, regardless of the length of rental assistance.

Rental assistance may be provided for short-term (up to 4 months) or medium-term (from 4 to 24 months). Rent in arrears is paid to the owner of the housing at the time the security deposit and 1st month's rent are paid. After 4 months, if program participants need additional financial assistance to remain housed, they must be evaluated for eligibility to receive up to 20 additional months of medium-term rental assistance. Case Managers will provide ongoing case management to transition program participants to independence.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

CHSPis in the process of developing an assessment system. Due to geography and other factors, The CoC has elected “coordinated” assessment and referral system as opposed to centralized assessment and referral. The Coordinated Assessment and Referral System (CARS) is intended to offer those seeking services multiple locations from which they can access services; each agency doing intake using the same set of agreed-upon assessment and targeting tools; makes referrals using the same criteria; and has access to the same set of referrals. The CARS is designed to improve service provision and data efficiency and improvement through a standardized access and assessment process for all clients and a coordinated referral process for clients to receive prevention, housing, and/or other related services. Key CARS strategies include: 1) Tailor to local needs and systems; 2) Ensure access for all in geographic area; 3) Implement in parts/pieces; 4) Use HMIS; 5) ID available resources in system; 6) Quality assurance; and 7) Test and adjust.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City is an “Entitlement City” and as such receives a funding allocation relating to population from HUD. The funding, subject to federal budget authorization, is provided on an annual basis and coincides with the City's July 1 through June 30, fiscal year.

To distribute funds previously mentioned, the City typically conducts an annual Notice of Funding Availability (NOFA). The NOFA process begins with published notices in the local newspapers, both in English and Spanish. Notifications are sent out to the various non-profit agencies that provide public services to the community. A workshop is held by City staff to assist with proposals and to inform applicants of changes and new regulations.

The application is available online by visiting www.citydataservices.net. All proposals must be submitted electronically. A deadline is provided for the submission of proposals. It is normally a minimum of thirty (30) days from the day the NOFA application notice is published. Applications that are incomplete, lack required attachments, or applications submitted after the published deadline are not to be considered for funding. After the closing date, proposals are first reviewed for completeness and then evaluated against applicable HUD regulations, the City's CP, City Council goals and objectives, and other related City policy (e.g., General Plan). Funding recommendations are developed by housing staff taking into account total available funds, applicant experience, project readiness and feasibility, leveraging of funds, track record with City (when applicable), and likelihood for timely use of HUD funds.

Staff recommendations are forwarded to the Housing and Land Use Committee for a formal recommendation to City Council. Then recommendations are taken to City Council for final approval. The City Council meets regarding the draft CP and AAP to obtain public and Councilmember comment. Advance notice is published in *The El Sol* (Spanish) and *The Californian* (English) newspapers to allow for a minimum thirty (30) day public review and comment period in adherence to the City's CPP. The City Council is the final local decision-making body over HUD entitlement funding and approves recommendations and authorizes the submittal of the CP and AAP and other required documents to HUD.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

Under § 576.405(a) of the Interim Rule, all subrecipients are required to meet the homeless participation requirement, which calls for not less than one homeless or formerly homeless individual on the board or other equivalent policymaking entity. All agencies currently receiving ESG funding meet the homeless participation requirement by having a formerly homeless person on its board or policymaking entity. In addition, all potential ESG applicants for funding are asked to certify meeting the homeless participation requirement under Part 11, #5 of the NOFA application. This is critical because part of our standard policies dictate that applicants not meeting this requirement will not be considered for funding.

5. Describe performance standards for evaluating ESG.

The following performance standards for evaluating ESG activities were developed in consultation with the CoC using the format detailed in Section 427(b) of the McKinney-Vento Act (as amended by the Hearth Act). These standards will be used to evaluate each ESG subrecipient's effectiveness in targeting those most in need, lowering the number of homeless persons, reducing the amount of time people are homeless, and mitigating housing barriers for the participants. Staff will work closely with the CoC as well as the subrecipients this first year and over time to determine the

reasonableness of these standards.

Barriers faced by individuals and families (participants) o the length of time participants remain homeless:

- extent to which participants experience repetitive homelessness
- effectiveness of subrecipient in reaching the homeless
- overall reduction in the number of homeless
- job and income growth
- success at reducing the number of participants who become homeless

Plan of the subrecipient to:

- reduce the number of participants who become homeless
- reduce the length of time participants remain homeless
- identify participants who become or remain homeless through collaboration with local education agencies
- fulfill other criteria such as: addressing the needs of all relevant subpopulations incorporating comprehensive strategies for reducing homelessness setting quantifiable performance measures setting timelines for completion of specific tasks identification of specific funding sources for planned activities identification of individual/group/agency responsible for overseeing implementation of specific strategies
- exercise authority to use funds under section 422(j)

**Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)**

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted

with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the

beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that 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. If the jurisdiction will not refinance existing debt, enter “N/A.”

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Discussion:

See discussions above.