

CITY OF MONTEBELLO



2024-2025
Annual
Action Plan

Los Angeles County, California

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

As an entitlement jurisdiction, the City of Montebello participates in the Community Development Block Grant Program (CDBG). A variety of projects can be funded by this program, which is administered by the US Department of Housing and Urban Development (HUD), with eligibility based on meeting the following national objectives: Benefiting low- and moderate-income persons; Eliminating slums and blight; or meeting particular community needs. Montebello also participates in the HOME Investment Partnership Program (HOME) which is also administered by HUD. By FY 2024-2025, the US Department of Housing and Urban Development (HUD) is expected to allocate approximately \$629,059 in CDBG entitlement funds and \$325,344 in HOME entitlement funds to Montebello. Additionally, approximately \$88,316.88 in CDBG carryover amount, and \$3,986.97 in program income. The city is expected to also receive approximately \$606,842.94 in HOME Program Income and approximately \$919,433.25 HOME carryover amount is available.

According to the 2020-2025 Consolidated Plan, housing and community development activities can address the priority needs and goals identified. Additionally, the available program income for HOME is \$665,808.02.

In 2024-2025, both programs will have the following approximate allocations:

CDBG: \$ 721,362.85

HOME: \$ 1,851,620.19

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items, or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Montebello stakeholders identified needs and priorities for community improvement as part of the Consolidated Plan, which is supported by federal grant funds and other available resources. In compliance with the City's HUD-approved Citizen Participation Plan, the city implemented a survey and public hearing to ensure maximum resident participation. A Consolidated Plan was developed using this process, which allowed Montebello residents an opportunity to influence the priorities.

As outlined in the 2020-2025 Consolidated Plan, the city will implement the Annual Action Plan for Fiscal Year 2024-2025 to address its priority needs and objectives. In total, \$721,362.85 and \$ 1,851,620.19 will be used to conduct these activities through the CDBG and HOME programs. In FY 2024-2025, the City proposes to achieve the following three (3) national objectives:

- Low- and moderate-income-benefitting activities
- Blight or slum prevention or elimination activities
- Priority-designated activities

Accordingly, the City established the following objectives to meet the needs identified in the Consolidated Plan:

Annual Action Plan
2024

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- Increase affordable housing opportunities
- Provide decent and energy-efficient housing
- Increase the variety and accessibility of fair housing
- Providing essential public services
- Increase economic opportunities
- Increase the earning potential of LMI families
- Administration and planning

Low-moderate-income households benefit from a number of activities and programs developed by the City as part of its community development objectives.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Consolidated Annual Performance and Evaluation Reports (CAPERs) are developed each year during the City's annual planning process, detailing how the City met its needs and objectives established in the previous Consolidated Plan and Annual Action Plan for 2020-2025. The City's most recent CAPER reports on the Consolidated Plan's third year. In the current Fiscal year of 2023-2024, the city intends to achieve the following key accomplishments:

- Serve approximately 140 households by providing referrals, investigations, case management, and litigation services, as well as resolving landlord tenant disputes through various public service programs.
- Serve approximately 15 households by providing food and other essential goods.
- Serve approximately 100 youth through the Recreation Scholarship Grant Program providing access to youth recreation activities for undeserved youth in the city.
- Serve approximately 50 households to fight food insecurity through a food distribution program that provides free and fresh produce.
- Serve approximately 20 persons with job opportunities, career development and professional skills training for the youth of the City.

In accordance with the Consolidated Plan, the City and its partners are continuously working to attain the objectives.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

During the development of the FY 2024-2025 Annual Action Plan, the following citizen participation processes were implemented:

NOFA: Publication of a notice of available funding and request for applications on November 15, 2023, in the Whittier Daily News and on the City website;

Community Outreach: Hold a public participation meeting on January 16, 2024 to discuss community needs, funding applications, and potential allocations.

Public Hearing: A public hearing will be held before the City Council on February 28, 2024, to determine whether the Action Plan should be adopted. The hearing was open to agencies and organizations that serve low-moderate income persons and those with special needs. A public notice of the hearing was published in the San Gabriel Valley Tribune, displayed at City Hall in the Planning and Community Development Department, and posted online;

Proof of publication: A copy of each of the public hearings and outreach efforts will be found in the Appendix once the copies become available. Agencies and organizations serving low-moderate income families and those with disabilities were notified directly.

A 30-day public review: A 30-day public review will take place from January 29, 2024, to February 28, 2024. Public access to the draft Action Plan is available on the City's website and at City Hall (Planning and Community Department). Please feel free to request a copy in person, by phone, or by email. A sufficient amount of notice was provided in advance of all public hearings by city staff.

At least 30 days prior to a public hearing, newspapers of general circulation are published with advance notice, and translation services are always available to non-English speaking residents upon request. The City also ensured reasonable access to information and records related to the development of the Plan and to the expenditure of funds for programs funded by CDBG. The Planning and Community Development Department's Housing Division maintains the final Consolidated Plan, Annual Action Plans, amendments to the Plans, and annual performance reports for five years.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

According to Federal regulations and the City's Citizen Participation Plan, the Montebello News published a Notice of Funding Availability and Request for Proposals on November 15, 2023. The Whittier Daily News published a notice inviting interested parties to participate in public hearings according to Federal regulations. The city provided citizens with a notice of funding availability that invited them to take part in a Community Needs Survey. On January 29, 2024, the city announced public hearings and comment periods for the draft Annual Action Plan. A copy of the FY 2024-2025 Annual Action Plan can be found on the City's website. From January 29, 2024, until February 28, 2024, there will be a 30-day comment period. A summary of any comments received will be included in the Annual Action Plan prior to submission to HUD.

6. Summary of comments or views not accepted and the reasons for not accepting them

Any comments received will be identified in the Annual Action Plan prior to HUD submission.

7. Summary

Any comments received will be identified in the Annual Action Plan prior to HUD submission.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MONTEBELLO	Planning & Community Development Department
HOME Administrator	MONTEBELLO	Planning & Community Development Department

Table 1 – Responsible Agencies

Narrative (optional)

In addition to preparing required reports, implementing grant-funded programs, and administering grants, the Planning and Community Development Department (Housing Division) administers both CDBG and HOME programs. As needed, program consultants assist with the CDBG and HOME programs under the supervision of the Housing Manager in the Planning and Community Development Department.

Consolidated Plan Public Contact Information

City of Montebello
Planning and Community Development Department
1600 West Beverly Blvd
Montebello, CA 90640
Phone: (323)887-1200 Ext. 598
Attn: Joseph Palombi, Director of Planning & Community Development

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

In developing the 2024-2025 Annual Action Plan, Montebello consulted with important City divisions and departments such as Code Enforcement and Parks and Recreation. Additionally, several local public agencies were consulted during the development of the Consolidated Plan, including the Los Angeles County Development Authority. In the 30-day public review period between January 29, 2024 and February 28, 2024, copies of the Annual Action Plan will be available.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

Among the agencies consulted by the City were local and regional social service agencies, the Los Angeles Homeless Services Authority (LAHSA), Montebello Community Assistance Program (MCAP), and Los Angeles County Development Authority (LACDA) in order to improve collaboration between public and assisted housing providers, private providers, and government agencies in mental health, health, and services. This consultation aimed to identify opportunities to improve the availability and accessibility of services and to gather data on the City's priority needs.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City of Montebello continues to be a part of Los Angeles Homeless Services Authority (LAHSA) Continuum of Care for Service Planning Area 7 (SPA7). Los Angeles County Homeless Services Authority (LAHSA) was established in December 1993 in order to coordinate Federal and local funding so as to provide services to homeless people throughout the county and city. Homeless people in Los Angeles County and City receive shelter, housing, and services from Los Angeles Homeless Services Authority, which coordinates and manages over \$70 million in funds from the Federal, State, County, and City. LAHSA provides assistance to Montebello residents.

In our consultation efforts, we exchange information with the Los Angeles County Development Authority, community-based organizations, and hold telephone conferences throughout the year and identify mutual problem areas.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City does not meet the threshold to receive ESG funds.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Los Angeles County Development Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Information about LACDA's affordable housing resources was gathered in meetings and conversations, and LACDA was identified as an important partner in meeting the City's housing needs.
2	Agency/Group/Organization	Montebello Community Assistance Program (MCAP)
	Agency/Group/Organization Type	Provide access to Homeless resources and Emergency Housing
	What section of the Plan was addressed by Consultation?	Homeless
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through several meetings and consultations. In addition to discussing homeless services available to the most vulnerable population, MCAP staff met with staff from the program management team. Continuing coordination will determine the best use of funds for the city's homeless program.
3	Agency/Group/Organization	Montebello Code Enforcement
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Program management staff met with representatives of the City department to discuss operation of the code enforcement program need for these services in the city, and the condition of housing and neighborhoods.
4	Agency/Group/Organization	Heart of Compassion
	Agency/Group/Organization Type	Services-homeless Services- Food Insecurity
	What section of the Plan was addressed by Consultation?	Vital Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through the application process, program management staff participated in discussions with HOC staff to identify the best use of funds to help families and individuals in the City facing food insecurity.

5	Agency/Group/Organization	YMCA
	Agency/Group/Organization Type	Services- Senior Services & Food Insecurity Services- At Risk Youth Recreation & Preschool Services
	What section of the Plan was addressed by Consultation?	Vital Public Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through the application process, program management staff participated in discussions with YMCA staff to identify the best use of funds to help families in the City facing food insecurity.
6	Agency/Group/Organization	Youth Employment Program (YEP)
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Employment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through the application process, HUD program management staff participated in discussions with the Recreation and Community Services Department to identify the best use of funds to help LMI families in the City.
7	Agency/Group/Organization	Broadband Internet Providers
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Broadband Internet Service
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Staff from the City consulted with major internet providers in the city via phone meetings, including Spectrum and AT&T. Montebello residents, including those with low and moderate incomes, have broadband access, based on these major internet providers in the city. Additionally, the city contacted the Federal Communications Commission. Low- and moderate-income families in the city need affordable services from more than one provider. The Montebello household units need broadband connections and broadband wiring in order to utilize broadband services. These major internet service providers will continue to offer broadband access plans at low- and moderate-costs for low- and moderate-income households.
8	Agency/Group/Organization	Resilience Specific Agencies
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Resiliency Agencies

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The city is a part of the Climate Communities Initiative Program lead by a HUD approved agency named Enterprise. The city consults by participating in monthly core topic community resilience discussions such as: Climate Resilience 101, Equity 101, Community and Stakeholder Engagement and Assessing Risk & Vulnerability. The outcome of these consultations is that city staff are obtaining knowledge and resources to continue addressing climate resiliency in the City of Montebello.</p> <p>Among the experts consulted was the National Institute of Standards and Technology (NIST). NIST's six-step process for planning community resilience was followed by the City's Hazard Mitigation Plan. A hazard mitigation plan developed by the city evaluates and identifies the vulnerability of housing to natural hazards associated with climate change. Therefore, the city will continue to identify and assess any risks related to certain weather patterns. As designated in the Hazard Mitigation Plan, the city plans to continue to implement mitigation strategies in the event of earthquakes, wildfires, flooding, DAM failures, and droughts. In the event of a natural disaster, this plan will make the city more resilient. A consultation with the Federal Emergency Management Agency was also conducted. To reduce the risk of floods in the future, the City adopted local floodplain management regulations. The City participates in the National Flood Insurance Program (NFIP) as a participating community.</p>
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Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

The City of Montebello consulted with various agencies serving the Montebello community. During the consultation process, no agency type was specifically excluded.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Los Angeles Homeless Services Authority	Both address issues concerning homelessness and special needs housing.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

**1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

In developing this Annual Action Plan, the City of Montebello followed its approved Citizen Participation Plan, which meets HUD’s Federal requirements for citizen participation. The City of Montebello offered opportunities for participation and comment by the public and agencies for the city’s Annual Action Plan. There was a public hearing on February 28, 2024 and 30-day review and comment period of the Annual Action Plan from January 29, 2024, to February 28, 2024. Montebello residents were provided details on how to submit comments and the period of when comments will be accepted. The goal of the city is to adhere to the HUD approved Citizen Participation Plan and to ensure that all Montebello residents have access to review the Annual Action Plan. The Citizen Participation Outreach procedures are identified in the following chart.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of Comments Received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-targeted/broad community	A newspaper advertisement was published on 11/15/2023 notifying interested parties of funding availability	No comments received.	No comments received.	
2	Newspaper Ad	Non-targeted/broad community	A newspaper advertisement was published on 01/29/2024 notifying interested parties of Public Hearing and Public Input	Any comments received will be entered here.	Any comments received will be entered here.	
3	Internet Outreach	Non-targeted/broad community	Draft AAP was on city’s website for public review and comment	Any comments received will be entered here.	Any comments received will be entered here.	www.montebelloca.gov
4	Public Meeting	Non-targeted/broad community	Public Hearing for adoption of AAP	Any comments received will be entered here.	Any comments received will be entered here.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City anticipates utilizing the resources in Table 5 during FY 2024-2025 to meet Consolidated Plan Goals. The amounts on this table are approximate amounts for annual allocations:

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	629,059	3,986.97	88,316.88	721,362.85	721,362.85	A HUD formula-based program that annually allocates funds for eligible housing and community development activities.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	325,344	606,842	919,433.25	1,851,620.19	1,851,620.19	A HUD formula-based program that annually allocates funds for eligible housing and community development activities.

Table 5 - 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

State and local funds will continue to be utilized to leverage federal entitlement funds, including, but not limited to:

1. The City General Fund (Affordable Housing Projects)
2. By offering Owner-Occupied Rehabilitation grants to low-to-moderate-income households, we will preserve the City's existing affordable housing stock.

Throughout the years, the City of Montebello supports low-to-moderate-income residents' housing needs through public services that achieve the goals, objectives, and policies of the AI and ConPlan. As a result of other priorities and limited funding, the city will not be able to utilize CDBG funds for these activities this year. However, Montebello residents will still have access to public services through other means.

In order to maximize the impact of HOME funds, Homeowners in Montebello will have the opportunity to get

grants to rehabilitate their homes through the new HOME Rehabilitation Grant Program.

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

A property located within the City of Montebello will be used to provide residents of the City of Montebello with affordable housing opportunities (Multifamily rental new construction). Located on 6th Street and Whittier Boulevard in Montebello, CA, the property is part of the city's downtown area. There will be two phases to the affordable housing project. In 2023, the Phase-one development began and is currently being developed.

Discussion

See discussion above.

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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	Administration	2024	2025	Administration	Citywide	Planning and Administration	CDBG: \$58,480.99 HOME: \$185,162.00	Other: Program Administration
2	Fair Housing	2024	2025	Administration	Citywide	Ensure Equal access to housing opportunities	CDBG: \$20,000.00	Other: Promotes Fair Housing
3	Housing	2024	2025	Affordable Housing	Citywide	Increase and preserve the supply of affordable housing	HOME: \$966,458	HOME Rehabilitation Grant: 10 households/Housing units
4	Housing	2024	2025	Affordable Housing	Citywide	Increasing Affordable Housing Opportunity	HOME: \$700,000.00	CHDO- Acquisition and New Construction: Future Project
5	Economic Development	2024	2025	Economic Development	Citywide	Expanding economic opportunities	CDBG: \$557,582.86	Section 108 Loan Repayment
6	Economic Development	2024	2025	Economic Development	Citywide	Expanding economic opportunities	CDBG: \$85,299	Commercial Façade Program

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Planning and Administration
	Goal Description	Planning and Administration provides funds for program and project delivery, general operation and administration of CDBG and HOME funds as well as planning and support for CHDO.
2	Goal Name	Expand fair housing choice and access
	Goal Description	The City will continue to collaborate with entities that help with families and individuals seeking counseling and or legal solutions to fair housing and discrimination problems.
3	Goal Name	Maintain decent and energy efficient housing stock
	Goal Description	Provide funding for the development of new affordable housing, homebuyer assistance programs and or utility or rent reduction programs for low- and moderate-income families. Fund housing solutions that may include programs that increase homeownership, housing improvements for special needs populations, support integrated housing solutions and plans, and reduce barriers to affordable housing consistent with the City's Analysis for Impediment to Fair Housing Choice. Provide funding for programs for owner-occupied housing rehabilitation including activities related to home improvements, energy efficiency, structural improvements, and/or other home sustainability projects.
4	Goal Name	Increase affordable housing opportunities
	Goal Description	Affordable Housing

5	Goal Name	Expanding economic opportunities
	Goal Description	Section 108 Loan Re-payment and Commercial Façade Program

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects will be undertaken during the Fiscal year to address priority needs and objectives:

Projects

#	Project Name
1	Program Administration CDBG
2	Fair Housing Program
3	Section 108 Loan Payment
4	Commercial Façade Program
5	Program Administration HOME
6	HOME Rehabilitation Grant Program
7	CHDO-Acquisition & New Construction

Table 7 - Project Information

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

The allocation priorities are based on the city’s FY 2020-2025 consolidated plan which forms the basis for establishing objectives and outcomes in the Strategic Plan and five (5) Annual Action Plans that follow:

Economic Development: Provide for the economic development needs of low- and moderate- income neighborhood target areas and businesses.

Fair Housing: Promote fair and equal housing choice for all persons, promote housing that is accessible to and usable by persons with disabilities, and comply with the non-discrimination requirements of the various Fair Housing laws.

Affordable Housing: Increase affordable housing opportunities and maintain decent and energy efficient housing stock.

Administration and Planning: Provide for administration and planning activities to develop housing and community development strategies and programs needed to carry out actions that address identified needs in the Consolidated Plan.

Given the limited CDBG funding allocation, this fiscal year the city will face the obstacle of lack of funds to address underserved needs and public service needs through the CDBG program. However, the underserved needs

population will continue to be served through other programs offered by the city and surrounding supportive agencies such as MCAP, Continuum of Care, LA County partners and SPA 7 partners. Also, public service needs will be served through continuous programs offered through non-profits that service Montebello residents.

AP-38 Project Summary
Project Summary Information

1	Project Name	Program Administration CDBG
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$58,480.99
	Description	The City will continue to provide planning and administration services required to manage and operate the City's CDBG program. Such funds will assist in managing community development, housing, and economic development programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	The entire Community will benefit from the City's Administration of the CDBG Grant, though the direct beneficiaries of each funded activity will be primarily low- and moderate-income residents.
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	CDBG Program Administration
	2	Project Name
Target Area		Citywide
Goals Supported		Expand fair housing choice and access Planning and Administration
Needs Addressed		Planning and Administration
Funding		CDBG: \$20,000
Description		Housing Rights Center will provide fair housing services, handle fair housing cases and education.
Target Date		6/30/2025
Estimate the number and type of families that will benefit from the proposed activities		140 households assisted. Two housing rights workshops are provided annually.
Location Description		3255 Wilshire Blvd. Los Angeles, CA
Planned Activities		CDBG funds will be used to provide fair housing services to residents to prevent discrimination, provide referrals, investigations, case management, and litigation, and resolve landlord tenant disputes.

3	Project Name	Section 108 Loan Payment
	Target Area	Citywide
	Goals Supported	Expanding economic opportunities
	Needs Addressed	Economic Opportunities/Section 108 Loan Repayment
	Funding	CDBG: \$557,582.86
	Description	Loan repayment for completed improvements include the replacement of sidewalks, curbs and gutter, street irrigation, lighting, water and sewer lines, sidewalk improvements compliant with the Americans with Disabilities Act, landscaping, and street furniture.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Loan Repayment- Not Applicable.
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	Section 108 Loan Payment
4	Project Name	Commercial Façade Program
	Target Area	Citywide
	Goals Supported	Expanding economic opportunities
	Needs Addressed	Economic Opportunities/Businesses
	Funding	CDBG: \$85,299
	Description	Facilitate commercial revitalization and enhance the character in the targeted area, Preserve and beautify the Low to Moderate Income (LMI) Areas in the City, and create a pleasant walkable environment through improvements to the visual aesthetics of commercial building facades.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	3-4 businesses
	Location Description	1600 West Beverly Blvd., Montebello, CA
	Planned Activities	CDBG funds will be used to enhance economic opportunities.
5	Project Name	HOME Rehabilitation Grant Program
	Target Area	Citywide
	Goals Supported	Increase affordable housing opportunities Maintain decent and energy efficient housing stock
	Needs Addressed	Reduced housing improvement costs
	Funding	HOME: \$966,458.19
	Description	Rehabilitation Grant

	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10 Families/households
	Location Description	Citywide
	Planned Activities	Eligible home repairs
6	Project Name	CHDO-Acquisition & New Construction
	Target Area	Citywide
	Goals Supported	Increase affordable housing opportunities
	Needs Addressed	Affordable housing and lower housing costs
	Funding	HOME: \$700,000
	Description	Acquisition/rehabilitation of property for low-income housing
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Future Project
	Location Description	Citywide
	Planned Activities	Acquisition/Rehabilitation for low-income housing
7	Project Name	Program Administration HOME
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: \$185,162
	Description	The City will continue to provide planning and administration services required to manage and operate the City's HOME program. Such funds will assist in managing community development, housing, and economic development programs.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Planning and Administration
	Location Description	1600 West Beverly Blvd, Montebello, CA
	Planned Activities	Planning and Administration

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 of Montebello aims to spend all entitlement funds in target areas, including those that contain a high percentage of low- and moderate-income citizens and minorities. Low- and moderate-income areas, which make up the bulk of the city's residential areas, are the only locations where HUD funds activities. In most cases, eligibility is determined by both household income and household size. CDBG funds will be spent according to the program's guidelines. The administration of programs for qualified beneficiaries will also include the provision of public services and the implementation of fair housing activities.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Although funds are generally allocated to Citywide target areas and CDBG funding is prioritized annually by the city for citywide housing and community development activities such as housing, public services, and fair housing. Due to meeting other priority needs and lack of funding, this fiscal year CDBG Funding will not be used for public service priority needs.

Discussion

See above discussion.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

This year, due to meeting other priority needs and insufficient CDBG funding, CDBG funds will not be used for affordable housing. However, HOME funds will be used towards the rehabilitation of existing units. Although the current yearly goal for three (3 units) is based on the 2020 Con Plan goals for the City, the city will increase the number of homes that can apply for the HOME Rehabilitation Grant Program if the opportunity and the funds are available. A marketing campaign will be implemented for the new grant program by the City in order to make this program available to as many qualified homeowners as possible. Through this marketing strategy, city staff will reach out to eligible households in the City. As part of the city of Montebello’s marketing strategy, an updated program brochure will be published, along with a new program flyer, and a continuous social media and website promotion campaign will be made to promote the program to the residents of the city.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs (Youth)	0
Total	0

Table 9 - One Year Goals for Affordable Housing by Support Requirement

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

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Montebello will begin to offer the HOME Rehabilitation Grant Program by providing new grants to eligible property owners to improve the City's rental housing stock in need of rehabilitation, providing safe, decent, and sanitary housing for low-income families. Furthermore, the City helps preserve existing affordable housing by providing technical assistance to property owners. In an effort to encourage affordable housing development, the City utilizes the State's density bonus law to offer density bonuses of 35 to 50%.

HOME activities in the City are being funded with funds from the previous year. The HOME Program previously offered loans for residential rehabilitation. This fiscal year the city will offer a grant program for residential rehabilitation instead. The city also offers funds for building and acquiring affordable housing units. According to HUD regulations and the HOME Final Program Rule, grantees are required to set aside at least 15% of their allocations for projects and activities carried out by Community Housing Development Organizations (CHDOs). This year more than 15% of HOME funds have been set aside. Funds have been set aside for the construction or

acquisition of affordable housing in Montebello.

HOME funds are generally used by the City to develop affordable housing and now will also be used in the form of grants for owner-occupied single-family homes. To achieve affordable homeownership, the city must abide by HOME affordable homeownership limits established by HUD. In addition, HOME-funded projects require properties to be worth no more than 95% of the neighborhood's median purchase price after rehabilitation. According to the HOME Final Rule, owner-occupied single-family housing can be priced at 95% of median price in two ways:

1. HUD will set limits for affordable housing at 95 percent of the median purchase price of the area;
OR
2. Conduct a local market survey to determine the 95 percent limit on median purchase price.

The city will continue to use the 2023 HUD approved HOME Homeownership Property Value Limit in the amount of \$735,300 since it was recently approved on November 28, 2023.

AP-60 Public Housing – 91.220(h)

Introduction

There is no public housing in Montebello that is owned or managed by the city. Public housing needs are addressed through various initiatives this fiscal year. There is no public housing in Montebello, and it is not owned or managed by the City. The Los Angeles County Development Authority (LACDA) offers a Family Self-Sufficiency Program as a means of encouraging residents to become more involved in management and take part in homeownership.

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

LACDA is responsible for making rental assistance available to low-income households through the Section 8 programs in the city, but the City is not directly involved in the ownership or management of public housing.

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

Not Applicable- The City is not a Public Housing Agency.

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

Not Applicable.

Discussion

None.

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

Introduction

The City's one year goal to reduce and end homelessness is to continue to provide limited resources for homeless individuals. This fiscal year, due to meeting other priority needs using CDBG funds, the city will not be able to allocate funds towards public service for the homeless and people with other special needs. However, city staff will continue to provide support to the homeless population by referring them to homeless organizations in the city that provide homeless shelters, Supportive services, and Transitional housing. CDBG Funds are not used to provide these limited resources. The City will continue to make strong efforts to provide resources and support to the homeless population in the city even if the services are not funded through the CDBG program. The City will also continue to seek homeless organizations that may benefit from future CDBG funding to support the homeless population in the City. Below are the services that are available to the city even though they are not funded through CDBG funds:

1. Homeless Shelters:

Many nonprofit organizations offered shelter and services to the homeless in the City to accommodate its share of the region's homeless. In order to help the homeless population in the City with emergency motel and food vouchers, the City has established a program called Montebello Community Assistance Program (MCAP). The City belongs to the Los Angeles County Continuum of Care Community Forum as well. This collaborative helps identify the needs and gaps in the homes and services for the homeless in the region.

2. Supportive and Transitional Housing:

The Los Angeles County Development Authority (LACDA) provides programs that offer supportive and transitional housing opportunities to the youth of Montebello with the goal of assisting them in becoming independent adults. LACDA has also developed affordable housing units for this cause.

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

Homeless outreach programs have been established by the City to help the homeless population in the City find temporary shelter and permanent housing. Montebello also contracts with local providers to reduce homelessness.

A total of eight Service Planning Areas (SPAs) exist in Los Angeles County, numbered 1 through 8. By dividing the County, the Department of Public Health can target and monitor the needs of each area more efficiently. The Montebello area falls within SPA 7.

An annual Housing Inventory Count (HIC), an inventory of service projects and a record of service usage, is coordinated by the LA Continuum of Care. People experiencing homelessness (e.g., emergency shelters, transitional housing, safe havens) and those who have experienced homelessness and have now found permanent housing are recorded in HIC. Currently in the city of Montebello, it is recorded that there are a total of 30 beds

provided by the Tiny Homes Village dedicated to serve people experiencing homelessness.

The most recent homeless count for the city has not been completed at this time therefore, according to the Point-in-Time (PIT) report dated February 22, 2022, there are 227 homeless people in Montebello. The City of Montebello is a part of Service Planning Area (SPA) 7 which offers resources and opportunities to support the homeless population in the City. SPA 7 offers several programs targeted at different homeless client groups.

As part of the program presented below, homeless individuals are assessed for their individual needs through the Coordinated Entry System. In the Coordinated Entry System (CES), regional providers work collaboratively to house chronically homeless people. An assessment tool is used to determine the most appropriate housing for individuals based on their needs. Also, the CES coordinates county and federal resources from agencies like the Department of Mental Health, the Department of Health Services, the Department of Housing, and the Department of Veterans Affairs.

Addressing the emergency shelter and transitional housing needs of homeless persons

A variety of homeless housing facilities are available at SPA 7, including emergency shelters, transitional housing, and permanent supportive housing. A list of housing resources for SPA 7 can be found on the LAHSA website. Addressing the emergency shelter need is a priority for the City of Montebello and for SPA 7 agencies.

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

As part of the City's efforts to assist homeless individuals, In particular, chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, are encouraged to transition to permanent housing and independent living. We aim to reduce homelessness among individuals and families, facilitate access to affordable housing units for homeless individuals and families, and prevent individuals and families from becoming homeless again after they have recently been homeless.

Homeless Family Solutions System – A network of family homeless service providers addresses the needs of homeless families or those at imminent risk of losing their homes through the Homeless Family Solutions System. Through collaboration with system partners, it helps families complete housing and service plans.

First 5 LA Supportive Housing Program (First 5 LA) – Programs like this one provide needs-based assistance to homeless or at-risk families with children from birth to age 5, many of whom have been involved with the County Department of Children and Family Services in the past or are presently involved.

Supportive Services for Veteran Families (SSVF) – An important objective of this program is to re-house homeless veterans and to prevent homelessness in those at imminent risk of homelessness due to a housing crisis. With this program, housing stability is achieved through focused, short-term interventions. As part of its housing-first model, the SSVF helps veterans and their families find and maintain permanent rental housing as quickly as possible and without preconditions, as well as facilitate access to services that will help their families stay in their homes.

HUD-VASH Vouchers (VASH) – US Department of Veterans Affairs provides case management and clinical services

bundled with Housing Choice Vouchers for homeless veterans through the HUD-VASH Program. During their participation in the program, veterans can access these services at Veterans Affairs medical centers as well as in community-based outreach clinics.

Unaccompanied Youth – A variety of programs are available for this target group, including the Family Crisis Center, Hathaway-Sycamores: Independent Living Program, and Richstone Family Center: Transitional Housing Program.

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.

Individuals and organizations involved in the discharge process from institutions and care systems, among them are the Los Angeles County Department of Children and Family Services, Los Angeles County Department of Health Services, Los Angeles County Department of Mental Health, and Los Angeles County Sheriff's Department (LASD), which all have state or county regulations requiring effective discharge planning and a specific transition plan to prevent individuals and families from becoming homeless.

In addition, Montebello has developed an outreach program for homeless individuals called the Montebello Community Assistance Program (MCAP). This program supports the City's homeless population by providing emergency motel vouchers, food, and hygiene kits, as well as assistance with accessing social services and permanent housing. A CDBG grant will not be awarded to MCAP this fiscal year.

Discussion

Programs like those outlined above, which address the needs of homeless persons and subpopulations of homeless, demonstrate that serving the homeless is a complex issue that requires collaboration among many agencies, departments, and nonprofit community service organizations. A network of agencies can provide housing and supportive services in addition to the limited CDBG funds available to the City.

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

Introduction:

A process was developed and prioritized by city staff, stakeholders, and the community at large to identify and address fair housing issues. Among the housing information in the City's 2020-2025 AI are barriers to affordable

housing. The following are some of the highest priority barriers to affordable housing:

- Cost of housing is high
- Household incomes are not keeping up with rising housing values
- Compared to market rate or higher cost homes, there are fewer affordable homes
- Housing opportunities for larger families are limited
- Inability to become a homeowner
- Instability of household finances
- There are not enough funds to subsidize economic development initiatives
- Under-educated residents
- A growing number of aging houses and infrastructure
- Homeless prevention services
- Affordable housing cannot be developed under current land-use policies

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

Based on specific data captures and existing policies and programs, the Analysis of Impediments to Fair Housing Choice (AI) developed goals and action steps. A data review and analysis process were necessary to identify the goals of the plan and the actions associated with them. Consultation with agencies, community outreach activities, and data review and analysis were required.

According to Table 47 (Page 58) in the AI, there are several goals and actions that will assist in advancing fair housing and affordable housing. In an effort to provide clearer direction to City staff, Council, and partnering agencies, ideas and recommended actions were documented as part of the engagement process. Goals identified in the AI are as follows:

- Goal 1: Increase affordable housing opportunities.
- Goal 2: Increase home ownership.
- Goal 3: Create public awareness of fair housing laws and affordable housing advocacy.
- Goal 4: Increase training, education, and employment opportunities.

In the 2024-2025 Annual Action Plan, the projects and programs that reduce the barriers to affordable housing include:

- Acquisition for Affordable Housing
- Housing Rehabilitation Grants
- Fair Housing (HRC)

To remove or improve the barriers to affordable housing, the City has adopted the following goals in the approved

2021-2029 Housing Element:

- Conserve and improve the condition of the existing affordable housing stock
- Identify and address the housing needs, including housing goals, policies, and programs
- Identify and address constraints to housing maintenance, improvement, and development
- Promote equal housing opportunities for all resident

A recent update to the Montebello General Plan has been completed by the City. Long-range planning documents like the General Plan set long-term goals and policies that will affect the City for the next 20 years. With the development of these policies, we can promote local and regional goals, including those related to housing accessibility and affordability ensuring compliance with state and regional housing regulations.

Discussion:

See discussion above.

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AP-85 Other Actions – 91.220(k)

Introduction:

Limited funding is a significant constraint to providing for the needs of low-income residents. Nonprofit service providers have also faced budgetary constraints due to economic challenges and cuts in grant funding.

Actions planned to address obstacles to meeting underserved needs

Montebello acknowledges the challenges faced by special needs populations due to low income and special circumstances. These challenges increase the chances of homelessness among special needs populations. Supportive services and housing are essential for populations with special needs. As part of its commitment to supporting special needs populations, the City prioritizes supportive housing and supportive services. A high priority is also placed on support services within the Continuum of Care. The city also partners with the Housing Rights Center who provide housing resources for the Montebello residents. The Housing Rights center will be funded through CDBG funds this Fiscal Year.

Actions planned to foster and maintain affordable housing

As part of its CDBG-funded efforts, the City maintains the affordable housing stock through its Housing Rehabilitation and Preservation Program and the Section 8 Housing Voucher program. A combination of Federal and non-Federal funds will be used to maintain existing affordable housing units and create new affordable housing opportunities. It is the City's goal to create clear and precise development standards that are in conformance with the General Plan vision and that facilitate predictable results during the development review process. To ensure compliance with State housing laws, review and revise current housing regulations (ADUs, mixed-use, transitional, and supportive housing, SROs, emergency shelters).

Actions planned to reduce lead-based paint hazards

HOME's Rehabilitation Grant Program will be required to comply with the Lead Safe Housing Regulation 24 CFR Part 35 effective September 15, 2000, as well as the HUD transition assistance policy effective September 20, 2000. Lead-based paint inspectors and risk assessors who are State of California certified will be used to test for lead paint and perform risk assessments when required. Lead paint abatement contractors will be used to remove and/or remove lead paint.

Actions planned to reduce the number of poverty-level families

As part of Montebello's efforts to expand economic activities to include everyone, the city continues to provide programs to those less fortunate. As part of its strategic plan, the City has focused on creating jobs for low- and moderate-income residents through youth employment programs, recreational scholarships, capital improvement projects, and Section 108 loan funds. The County's rental assistance program, housing improvement programs, and financing affordable housing development have resulted in housing the homeless and improving living conditions for low-income families and the elderly.

People living at or below the poverty line can be affected by a variety of factors. Higher education opportunities are limited, marketable skills are lacking, unemployment or underemployment is prevalent, affordable childcare is unavailable, effective transportation is lacking, and affordable housing is unavailable. To reduce poverty rates, these factors must be addressed. Even though the city does not control most of these factors, it routinely provides referrals to those living below the poverty line. Public services agencies and homeless resources are also listed, as

well as links to social service agencies. Additionally, the city supports nonprofits, private developers, and government agencies that provide affordable housing and economic opportunities to low- and moderate-income residents.

Actions planned to develop institutional structure

Managing CDBG funds received by the city is the responsibility of the Planning and Community Development Department and Finance Department. To implement affordable housing projects, work with seniors, at-risk youth, and other community development programs, the city relies on a number of governmental departments and agencies, for-profit developers, and nonprofit organizations.

- The City's Planning and Community Development Department's functions directly impact and facilitate the development of housing.
- The Public Works Department is responsible for the design, construction, maintenance, and operation of public facilities as well as for administering infrastructure projects.
- LACDA administers the HUD Section 8 Housing Choice Voucher Program and public housing, which benefits the city's low-income population with publicly assisted rental housing.
- Housing developers are an important partner and essential for the development of market-rate and affordable housing. Private developers are unable to build affordable units without government or other subsidies because of the high cost of land in the city.

The City's General Plan establishes clear and precise development standards that provide predictable outcomes and streamline the development approval process in accordance with the vision of the General Plan. To comply with state housing law, the General Plan provides updates to the regulations regarding ADUs, mixed-use, transitional, and supportive housing, SROs emergency shelters, and zoning standards.

The HOME program is the main source of funding for affordable housing and its administrative costs.

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

The Planning and Community Development Department (Housing Division) manages and coordinates these processes on behalf of the City. In collaboration with other City departments and the community, the Department develops programs and activities that benefit low- and moderate-income neighborhoods in Montebello. Public and social service activities, housing, infrastructure improvements, and economic development are included in the administration of the program activities. The City provides programming and services in collaboration with public agencies, for-profit entities, and non-profit organizations.

To provide homeless services, the Montebello Fire Department has established the Montebello Community Assistance Program (MCAP). The Public Service CDBG funds will not be used for MCAP this fiscal year. As part of its commitment to better serving the community, MCAP will continue to partner with private as well as public social service agencies.

Discussion: See above.

Program Specific Requirements

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

Introduction:

The City budgets to meet the 25% match in relation to HOME funds according to the HOME Match Guidelines establish by HUD.

The following reflect Program Specific Requirements:

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(l)(2)

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

The City will not use any other forms of investment beyond those identified in Section 92.205. Qualified homeowners can apply for a grant for property rehab through the Homeowner Rehabilitation Program. Upon transfer of title, refinancing or sale of the property prior to meeting all grant terms, the grant is due and payable. In order to qualify for rehab assistance, the property must meet certain housing standards. The property must be occupied by the owner. Applicants must have a household income of at least 80% of the area median income to qualify. Pre-qualification for this program should be obtained from the Planning and Community Development Department's Housing Division. After prequalification criteria's are met, the Housing Division will proceed with the qualification process. To qualify for the program, an application must be completed.

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:

As part of the HOME Program, the City will continue to implement the resale provisions for existing loans. In accordance with HOME resale provisions, the City must ensure, when a HOME-assisted homebuyer sells their home, either voluntarily or involuntarily, during the affordability period, (1) the property is sold to another low-income homebuyer who will use it as their principal residence; (2) the original homebuyer receives a fair return on investment (i.e., their down payment plus improvements made to the house); and (3) The property is sold at a price that is "affordable to a reasonable range of low-income buyers." Resale provisions must be used if the City only provides HOME assistance to develop the unit, but HOME funds are not used to lower the purchase price from the fair market value to an affordable price. During original purchase and at resale, the City will determine the homebuyer's fair return on investment using an objective standard or index that is publicly available and easily measurable.

The Fair Return on Investment is calculated as a percentage of changes in median sales prices over the period of ownership, based on the change in area median income over the period of ownership, and by the change in the Consumer Price Index over the period of ownership. Losses on investments can be considered a fair return in depressed and declining markets. Returns to homebuyers that are tied to the price that a specific family of homebuyers or a defined group of low-income homebuyers can afford do not constitute fair returns and cannot be accepted.

In a resale provision, the buyer's original investment and specific types of upgrades or additions that will improve the property will be considered in determining fair return. Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value. Additionally, the provision lays out the types of changes that will or will not be included.

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:

As part of the agreement, the City will include a provision that explains how it will make the housing affordable to low-income buyers if the resale price needed to provide fair return is not affordable to the subsequent purchaser. Presumption of affordability will enable the city to meet HOME resale requirements without the imposition of specific enforcement measures. To establish affordability, the City will conduct a combined market analysis for a limited number of contiguous neighborhoods that are similarly situated in terms of demographics, housing markets, and economics. An analysis of housing data will help identify if home values are affordable, and if they will continue to be affordable, for the same average period of affordability.

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:

At this time, the City has no plans to refinance existing debt secured by multifamily housing rehabilitated with HOME funds. The HOME Policies and Procedures Manual is used by the City to ensure compliance with HOME Program requirements.