



**CITY OF SPOKANE**  
**SPECIAL MEETING NOTICE**  
**COMMUNITY, HOUSING, AND HUMAN SERVICES BOARD**



Wednesday, May 6, 2020  
4:00 P.M. – 6:00 P.M.  
Teleconference Meeting

Join by Phone 1-408-418-9388

Access Code: 967-430-499

The regular scheduled Community, Housing, and Human Services (CHHS) Board will be held via teleconference; not in its normal location of the Council Briefing Center at City Hall. The teleconference meeting is open to the public. We do ask that all teleconference attendees mute their phones until they have a question; this will help eliminate background noise.

**AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION:** The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Spokane City Council Chamber in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) at the City Cable 5 Production Booth located on the First Floor of the Municipal Building, directly above the Chase Gallery or through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Human Resources at 509.625.6363, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or [msteinolfson@spokanecity.org](mailto:msteinolfson@spokanecity.org). Persons who are deaf or hard of hearing may contact Human Resources through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.



# Community, Housing, & Human Services Board

Vision: To provide opportunities that enhance the quality of life for Spokane's extremely low to moderate income populations.

May 6, 12:00 PM  
City Council Briefing Center  
Lower Level, City Hall

**TIMES GIVEN ARE AN ESTIMATE AND ARE SUBJECT TO CHANGE**

## 4:00 – 4:10 Call to Order - Board Chair

- 1) Approval of Agenda: **ACTION**
- 2) Public Comment - Please restrict comments to items relevant to the CHHS Board
- 3) Approval of the March Meeting Minutes: **ACTION**

## 4:10 – 4:15 Announcements

## 4:15 – 5:15 Discussion

- 1) Review and Approve Various Program Income Funding to Proclaim Liberty: **ACTION**
- 2) Review and Approve HOME Multifamily Housing Program Funds: **ACTION**
- 3) Review and Approve HOME TBRA Funds for COVID Relief: **ACTION**
- 4) Review and Approve Substantial Amendment to 2019 Action Plan: **ACTION**
- 5) RFP/Evaluation Committee Membership Approval: **ACTION**
- 6) Reschedule July Board Meeting: **ACTION**

## 5:15 – 5:25 Director Report – Tim Sigler

## 5:25 – 5:45 Board Education

- 1) CHHS v CoC Board Comparison
- 2) Funding Sources

## 5:45 – 5:50 Council Update

## 5:50 – 6:00 Committee Updates

- 1) Affordable Housing Committee
- 2) Evaluation and RFP Committee

## 6:00 Adjournment - Board Chair

### 2020 Board Meeting Schedule

All Board meetings are held in City Hall in the City Council Briefing Center from 4:00 – 6:00 pm unless otherwise posted.

February 5, 2020  
March 4, 2020  
March 27, 2020  
April 1, 2020 (cancelled)  
May 6, 2020  
June 3, 2020  
July 1, 2020  
August 5, 2020  
September 2, 2020  
October 7, 2020  
November 4, 2020  
December 2, 2020

**AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION:** The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Spokane City Council Chamber in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) at the City Cable 5 Production Booth located on the First Floor of the Municipal Building, directly above the Chase Gallery or through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Human Resources at 509.625.6363, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or [msteinolfson@spokanecity.org](mailto:msteinolfson@spokanecity.org). Persons who are deaf or hard of hearing may contact Human Resources through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.

**Username: COS Guest**

**Password:**

	Feb. 5	March 4	March 27	May 6	June 3	July 1	Aug. 5	Sept. 2	Oct. 7	Nov. 4	Dec 2
Gordon Graves	X	X									
Adriane Leithauser	X	X	X								
Rebecca Sero		X									
Kate Burke – Council Member	X	X	X								
Anne Stuyvesant-Whigham	LOA	LOA	X								
Dillon Thorpe	X		X								
Jan Simpson – CoC Rep	X	X									
Kathleen Torella – County Rep	X	X									
Melody Dunn		X	X								
Betsy Wilkerson – Council Member		X	X								
Barry Barfield			X								
Bob Hutchison			X								
Jason McAllister			X								
Jeri Rathbun			X								
Ike Okoli											

### **STANDING COMMITTEE MEETING INFORMATION**

**Affordable Housing Committee:** Second Tuesday of each month, 11:30 to 1:00.

*Arlene Patton, Adriane Leithauser, Phil Altmeyer, Andy Hoyer, Mark Muszynski, Patricia Kienholz, Gordon Graves, Diane Zemke, Barry Barfield, Michone Preston*

**Evaluation & Review Committee:** *Under Review*

**Executive Committee:** Third Wednesday of each month, 1:00 to 2:30 P.M. City Hall, 6<sup>th</sup> floor Conference Room - *Anne Whigham, Adriane Leithauser, Rebecca Sero, Dillon Thorpe, Tim Sigler*

**CA/CD:** First Tuesday of each month, 5:30 - 7:00 P.M. West Central Community Center, Newton Room

Refer to <https://spokanechhs.org/> for information on Board-related meetings and events

**AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION:** The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Spokane City Council Chamber in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) at the City Cable 5 Production Booth located on the First Floor of the Municipal Building, directly above the Chase Gallery or through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Human Resources at 509.625.6363, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or [msteinolfson@spokanecity.org](mailto:msteinolfson@spokanecity.org). Persons who are deaf or hard of hearing may contact Human Resources through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.



## Community, Housing, & Human Services (CHHS) Board

March 4, 2020  
Meeting Minutes

Meeting called to order at 4:01 PM.

### Attendance

- **Board Members Present:** Adriane Leithauser (Chair), Anne Stuyvesant-Whigham (by phone), Kathleen Torella, Jan Simpson, Gordon Graves, Kate Burke, Betsy Wilkerson, Rebecca Sero
- **Staff Present:** Kelly Burnett, George Dahl, Tim Sigler, Niki Madunich, Melissa Morrison
- **Guests Present:** Barry Barfield, Jeri Rathbun, Bob Hutchison, Ike Okoli, Will Holland, Charissa Boniface, Anna Belinski, Nadine Woodward

**Introductions:** CHHS Board members, city staff and guests present introduced themselves.

### Public Comment

No public comments were offered by meeting attendees.

### Approval of the Agenda

Motion to approve agenda made by CHHS Board member Betsy Wilkerson and seconded by CHHS Board member Melody Dunn.

➤ AGENDA APPROVED

### Approval of the February 2020 Meeting Summary

Motion to approve the February Meeting Summary made by CHHS Board member Melody Dunn and seconded by CHHS Board member Betsy Wilkerson.

➤ MEETING SUMMARY APPROVED

### Mayor Woodward Introduction

City of Spokane Mayor Nadine Woodward introduced herself to the board. Mayor Woodward looks forward to seeing the work the board does and provided an update on the ongoing CHHS Department inquiry.

### CHHS Department Third Party Audit Briefing

Mayor Woodward provided a brief history regarding the third party department audit announced publicly earlier in the media. At the beginning of her term, the mayor received information from current department staff that during previous administrations, city staff had concerns regarding the appropriateness of certain actions and felt pressured to take action they weren't comfortable carrying out as standard processes were not followed. Based on this information, the Mayor reached out to the State Auditor's office, who have confirmed that this inquiry does fit into their scope and they plan to be in City Hall as soon as next week. The Mayor and her administration felt the best course of action would be to proceed with transparency and did notify the media and the department itself of the investigative action to be taken. At this point, so early in the investigation information is limited, but the closing audit report will be made public. The work that the department does is important to the City of Spokane and the scope of the work handled is impressive and important to the community and she has absolute confidence in the current leadership within the department.

City staff member, Tim Sigler clarified that the staff concerns presented to administration were

in regard to standard processes and protocols not being followed, but that the projects that concerns were raised around did not involve the CHHS board. The audit will confirm if the department missed crucial steps in distributing public funds and ensure that moving forward there is a standard process in place through which all dollars and allocations flow. All current projects will remain funded.

### **Perpetual Housing, Acquisition and Capital Improvements Project Process Discussion**

Last month, the board made its first funding recommendation for the Perpetual Housing, Acquisition and Capital Improvements Project (PHACIP). Historically, funding recommendations have been routed through the RFP Committee for review and their recommendations have been brought before the board at large and then passed to City Council for approval. The idea behind the PHACIP is that it would make the city a better community partner by being more agile and responsive to community needs. In the past, agencies requesting funding would have to wait between 18-24 months for funding to be approved, the PHACIP would shorten that to 2-3 months. In addition to being more responsive, the new process includes the entirety of the board in the decision making and review process and allows them to understand the full context of their funding recommendations and the work being performed within the community as a whole.

Moving forward, this program model will be utilized for all funding through the CHHS department. Utilizing a rolling RFP will allow the city to have written record of all the ideas and projects coming in and be as responsive to them as current funds allow. Having a rolling RFP consistently posted will encourage community engagement with the city as well as give opportunities for consistent review by the board and remove the possibility of allocations being called into question or for funds to expire without being used.

Any applications received are reviewed and vetted by city staff for applicability or qualifications for program funds (CDBG, etc.). Last month was the first funding round and like anything new, questions and issues are expected. The diversity of the work groups represented on the board make it a great place to demo a program like this and is an opportunity for the board to be a part of the full conversation.

Board members expressed concerns that some projects that have been denied by the RFP committee may be able to slip through the cracks and gain funding via the PHACIP. The RFP committee may have identified specific concerns about certain projects and not shared them with the board at large and it's important that those projects not be approved without meeting criteria that in the past they have not. In the past, the RFP committee would take all applications received and break them down into groups being serviced and then score applicant responses question by question in order to make empirical data from subjective answers. The scoring matrix, while extremely useful for guiding discussions and ranking applicants, was never the sole decision factor. Many steps were taken in the decision process and included relevant players such as city staff and context discussion. The process gave a lot of focus to scoring but incorporated discussion and differing perspectives. The level of detail in that process made it feel equitable to all applicants as all information available was used in the decision making process. The discussion at last month's meeting was insightful and heated and ultimately came down to prioritization and spreading out available funds for the greatest good. Board members are unable to say, based on last month's discussion that it was sufficient for funding awards.

Moving forward, the board will be provided any applications received two weeks prior to board meetings and city staff member George Dahl will prepare a scoring matrix that can be utilized

to score applications prior to board meetings. While it is not possible for the board to pose specific questions to applicants, applications needing more detail may be returned to submitting organizations with feedback indicating more detail is needed. Any applicant is welcome to reapply, even on a repeating monthly basis. The board has no obligation to fund any projects received if they're not comfortable with the information available.

#### **HUD Section 108 Loan Guarantee Program - Open Public Comment Period**

City staff member, George Dahl presented information on the HUD Section 108 Loan Guarantee Program as it relates to the funding recommendation for Proclaim Liberty. At last month's board meeting and as part of the new PHACIP process, the board approved \$1.2 million in funding for a joint ECEAP and affordable housing units project, \$400k of which was requested as an interest free loan. The best option that the City could find to accommodate this request was through a HUD Section 108 Loan Guarantee. Toward that end, city staff met with HUD representatives to discuss the process. A Section 108 Loan is an opportunity to leverage the city's grant allocation to access low cost flexible financing for economic development, housing, public facility and infrastructure projects. Communities can elect to use Section 108 to finance a specific project or multiple projects. The loan fee is 2% of the loan and is financed at reduced interest. In order to be eligible, projects must address a CDBG National Objective and be a CDBG eligible activity. The Proclaim Liberty project is eligible for funding as it meets eligibility criteria and the application is in process. If the loan is approved, the payoff period is 20 years. As part of the application, city staff was advised to open a public comment period. The public comment period will run from March 4 through April 2 and any comments received will be addressed by April 17. Comments received will be presented to the board at the April 1 meeting.

Motion to open a public comment period regarding the HUD Section 108 Loan Guarantee Program made by CHHS Board member Gordon Graves and seconded by CHHS Board member Kate Burke.

- HUD SECTION 108 LOAN GUARANTEE PROGRAM PUBLIC COMMENT PERIOD OPENED

#### **Board Education - Conflict of Interest**

Each year, CHHS Board members are required to complete a conflict of interest (COI) Board Member Certification Statement acknowledging their receipt and understanding of the city's COI policy. If a board member has COI concerns, they're encouraged to bring those to the department director who can run them through the city's legal department. If business comes before the board that concerns an organization that a board member is personally involved with, board members may abstain from voting. The board does not allow for any financial conflicts. If a board member is approached to participate in some sort of community organization, the city requests those also be run through the legal department before committing.

#### **Board Education - Organizational Chart**

As part of their agenda packet, the board was provided with a department organizational chart. The chart is informational and further discussion will be had regarding how the department and board interact in the larger context of the Continuum of Care board and the system of providers and funders at the April board meeting.

#### **Board Education - Public Meetings**

Each year, CHHS board members are asked to complete training on the Open Public Meetings Act. During the meeting, the board watched the Attorney General's training video and signed

training certificates as a record of said training.

### **Director Report**

Staff member Tim Sigler provided the Director's Report including the following items:

- Final interviews for the open Homeless Programs Manager position are scheduled for Friday, March 6. Ideally, the successful candidate will be able to start within two weeks of their notification. After a couple months of training they should be up and running.
- Staff has been working with SRHD for information on how to navigate COVID19 in the community and specifically with at-risk populations like those found in shelters.
- Coordinating with state and local HUD departments to discuss disaster relief funding. The city would have to coordinate with the city service community in order to submit an action plan for addressing at-risk population.
- Mayor is commissioning an affordable housing task force, should be in line with boards already active in the community.

### **Council Update:**

City Council Member Betsy Wilkerson introduced herself to the board and explained she's happy to be a part of the board as her family has owned a business in Spokane and she personally has worked with many service providers and has service involved family members. Council Member Wilkerson feels her experience and relationships will be valuable assets to the board.

Council member Kate Burke introduced herself to the board and explained she's interested in solutions around housing and homelessness in our community. She also provided the following updates:

- A statewide housing conference is converging in late April
- Working with Council Member Cathcart for government transparency, they're planning a town hall April 11 to discuss ways it's lacking and how it can be increased and gather feedback from community members on what they'd like to see.

### **Committee Updates**

No updates were given from either the Affordable Housing or RFP committees.

### **Announcements**

No announcements were made.

**Meeting Adjourned at 5:57 PM.**

The next CHHS Board Meeting is scheduled for **April 1, 2020 from 12-4pm.**



## Community, Housing, & Human Services (CHHS) Board

March 27, 2020  
Meeting Minutes

Meeting called to order at 3:03 PM.

### Attendance

- **Board Members Present:** Adriane Leithauser (Chair), Anne Stuyvesant-Whigham, Kate Burke, Betsy Wilkerson, Barry Barfield, Jeri Rathbun, Bob Hutchinson, Dillon Thorpe, Melody Dunn, Jason McAllister
- **Staff Present:** George Dahl, Tim Sigler, Niki Madunich

### Approval of the Agenda

Motion to approve agenda made by CHHS Board member Melody Dunn seconded by CHHS Board member Betsy Wilkerson.

➤ AGENDA APPROVED

### Public Hearing: COVID-19 LMI Job Retention Project

Staff member George Dahl presented on the COVID-19 LMI Job Retention Project, thanking board members for their flexibility to meet during this unique time in order to help address community needs during the COVID-19 pandemic. To begin, attendees were instructed on how to access presentation materials on the city's website, should they be unable to view the presentation through the virtual meeting format.

The COVID-19 LMI Job Retention Project is an effort to respond to growing community need during the current pandemic. The City of Spokane is currently experiencing high amounts of job loss due to the mandated closing of certain businesses. This job retention project would act as a resource for business owners who employ low and moderate income individuals (80% AMI or lower). The funds available are CDBG and as such need to meet both a national objective, in this case an activity benefiting low and moderate income person, job creation or retention, and be an eligible activity, in this case special economic development activities.

The City proposes a partnership with Craft3 in order to offer business loans to higher risk businesses in our community. This type of assistance has previously been offered to small businesses during the North Monroe Street construction project to help ease the burden of businesses due to prolonged construction in the area. The current proposed iteration has an available \$100,000 allocation of city funds to help businesses retain jobs during this time. Craft3 will provide subsidized loans to small businesses to prevent loss of jobs due to the COVID-19 pandemic. CDBG funds will be used to buy down the interest rates of these loans to 6%. Total allocations will not exceed \$30,000 per FTE retained or created. Loans will be available to qualified borrowers and subject to underwriting by Craft3. Craft3 will match city funds at a 1:5 ratio; for every \$100,000 the city puts forward, Craft3 will contribute \$500,000.

The city requests that the board open a public comment period for the proposed COVID-19 LMI Job Retention Project. Information regarding the project and comment period has been posted to the city's website, Facebook, in the Spokesman Review and has been sent to local city councils in order to encourage public comment and participation. The presentation given during the public hearing should help to clarify how to make public comments and support transparent communication during this time. Public comments can be emailed to [spokanechhs@spokanecity.org](mailto:spokanechhs@spokanecity.org) or called in to 509-625-6325. At this time, no in-person



comments will be accepted. The department asks that commenters consider email options for comments as staffing at City Hall is intermittent during this period. Any comments received will be considered and responded to no than 15 days after the comment period has ended and will be presented back to the CHHS board and reflected as applicable in the project scope. The 30 day public comment period will run from March 27-April 27. Responses to comments will be communicated on or before Tuesday, May 12.

Following the presentation, the board was asked for feedback and comments on the proposed program. The following information was clarified:

- The Special Meeting notice and all presentations related to this public hearing are available to share via social media platforms to help spread public awareness of the program. Board members can share any links on the city's website to their personal social media pages.
- Applications will not be accepted until after the public comment period, per regulations. Additional options, including utilizing general fund dollars are being investigated, but the outcome is unknown.
- Businesses will have discretion to use funds as they see best, including for payroll.
- At this time it is unknown how many jobs could be retained or created through this program, although in the future there will be success measures available based on required reporting for CDBG dollars. Program recipients will be required to report on funds useage, including the \$30,000 limit per FTE.
- There are no requirements as to the types of businesses who could apply for the program, although it is anticipated that small businesses will be primary applicants and perhaps mostly in the service industry. Applicants will have to meet underwriting criteria of Craft3.

Motion to open a public comment period regarding the COVID-19 LMI Job Retention Program made by CHHS Board member Dillon Thorpe and seconded by CHHS Board member Melody Dunn.

➤ COVID-19 LMI JOB RETENTION PROGRAM PUBLIC COMMENT PERIOD OPENED

Motion to approve fund allocation for COVID-19 LMI Job Retention Program, barring public comments that would alter the scope of the proposal made by CHHS Board member Anne Stuyvesant-Whigham and seconded by CHHS Board member Melody Dunn.

➤ COVID-19 LMI JOB RETENTION PROGRAM FUNDING ALLOCATION APPROVED

Board member Betsy Wilkerson was present for the vote to open public comment period but due to a prior engagement was unable to stay for the vote on funding allocation.

### **Director Report**

Staff member Tim Sigler provided the Director's Report including the following items:

- Tim has been assigned to the Inland Incident Response Team as Director of Community Care, Mass Care, Vulnerable Populations, Food Security and Economic Impact. As director, he will be working to assemble several task forces to assist with managing the current pandemic at a regional level and thus, may be difficult to reach via email.
- Tija Danzig has been assigned lead for the Vulnerable Populations Task Force and likewise may be difficult to contact for department business.
- In the interim, please contact George Dahl for all board business and Scott Rasmussen for any homeless program inquiries.

Staff member George Dahl provided additional information, regarding possible alterations to CDBG standard policies and procedures:

- There has been speculation that the 30 day public comment period requirement may be suspended or abbreviated during the current pandemic crisis, but it remains speculation.
- Should the comment period requirement be amended, an additional 30 minute board meeting will be called and the information will be relayed to both board and community.

**Meeting Adjourned at 3:34 PM.**

The next CHHS Board Meeting is scheduled for **May 6, 2020 from 4-6 pm.**

DRAFT



**City of Spokane  
Community, Housing and Human Services Board – Board  
Committee Report**

---

**COMMITTEE:** Affordable Housing

**Chair:** Adrienne Leithauser

**Meeting Date:** April 14, 2020

**Date of Next Meeting:** May 12, 2020

**Members:** Adrienne Leithauser (Chair), Phil Altmeyer, **Gordon Graves, Andy Hoyer, Patricia Kienholz, Mark Muszynski, Arlene Patton, Michone Preston, Diane Zemke**  
**Staff Present:** Paul Trautman, Becky Tuno

**Discussion**

The Committee welcomed Adrienne Leithauser as Committee Chair and Becky Tuno in her new CHHS role helping deliver CDBG and HOME projects. The Committee discussed the initial HUD FY2020 income limits and Fair Market Rents.

**Action Items Completed:**

The Committee discussed the CARES Act and its impact on HOME funding. Staff explained recent HUD revisions including TBRA funds available for COVID-impacted low-income renter rent assistance. Also, the 15% CHDO set aside requirement is removed through FY2020 HOME funds.

The Committee unanimously recommended that HOME CHDO funds be available for TBRA rent assistance to COVID-impacted low-income renters.

The Committee reviewed an updated FFC Homes XII HOME funding application to construct two 2-bedroom homes for disabled renters below 30% AMI. The Committee reviewed and deferred this HOME application due to funding issues. FFC has since confirmed that Federal Home Loan Bank and Commerce Housing Trust Fund funding is now committed. FFC submitted an updated application requesting an increased \$230,000 HOME allocation addressing increased construction and soft costs.

The Committee unanimously recommends that the CHHS Board approve a \$230,000 HOME allocation, which exceeds the standard CHHS HOME funding limit. Allocation conditions include that the property operate as a Group Home and that staff confirm that \$50,000 of reserves will be capitalized from non-HOME funds.

**Action Items Pending:**

- Review HOME Multifamily Housing Program locally imposed limit on maximum HOME funds-per-unit. Review the Fall HOME RFP.

**Announcements:**

None

**Actions Needed by the Board:**

Review and approve FFC Homes XII HOME funding allocation.



**City of Spokane  
Community, Housing and Human Services Board – Board  
Committee Report**

---

**COMMITTEE:** Affordable Housing

**Chair:** Adrienne Leithauser

**Meeting Date:** April 27, 2020

**Date of Next Meeting:** May 12, 2020

**Members:** Adrienne Leithauser (Chair), Phil Altmeyer, Gordon Graves, Andy Hoyer, Patricia Kienholz, Mark Muszynski, Arlene Patton, Michone Preston, Diane Zemke

**Staff Present:** Paul Trautman, Becky Tuno

**Discussion**

The Committee discussed HOME Tenant Based Rent Assistance (TBRA) and HUD's recent HOME regulatory waivers for COVID response.

**Action Items Completed:**

The Committee discussed policy options for using HOME funds for TBRA COVID relief.

See the attachment.

**Action Items Pending:**

- Review HOME Multifamily Housing Program Fall 2020 RFP and local limit on maximum HOME funds-per-unit.

**Announcements:**

None

**Actions Needed by the Board:**

Review Affordable Housing Committee HOME TBRA advice as policy recommendations to City Council and Mayor.

## HOME TBRA-COVID Program Delivery

### COVID & HUD's HOME Waivers including TBRA

Due to COVID, Gov. Inslee orders "Stay Home, Stay Healthy" on 3/23/2020 and an eviction moratorium that expires June 4, 2020, *unless further extended*. Due to COVID, HUD encourages HOME grantees to reprogram HOME funds for other uses including Tenant Based Rent Assistance (TBRA) for a limited time. HUD's encouragement includes the ability to reprogram all CHDO funds to any HOME-eligible activity, including TBRA. TBRA-COVID is limited-time (not to exceed 12/31/2020) payment of rent and utilities (but not mortgage payments) for renters below 60% AMI experiencing financial hardship due to COVID 19.

### TBRA Funding

#### **Question: How much HOME funds do we reprogram to TBRA-COVID?**

Background: CHHS currently has \$1,436,237 HOME funds on hand (\$397,986 CHDO and \$1,038,251 Program Income from program years 2017-2019). Full TBRA funding could help about 530 renters pay about \$900/month rent for 3 months (April – June). Note that CHHS will receive new HOME funds on July 1, 2020 and I expect to offer **about** \$1,500,000 HOME funds in our Fall 2020 HOME RFP for affordable rental housing development.

Possible Options:

- Preprogram all ~~\$397,986~~ all available CHDO but save other funds for HOME projects or later COVID rent assistance
- Reprogram \$500,000 (all available CHDO plus some Program Income) but save other funds for HOME projects or later COVID rent assistance
- Reprogram all \$1,436,237 CHDO & Program Income funds

**We Recommend: Option B at \$500,000 (all available CHDO plus Program Income) to TBRA.**

#### **Question: Do we reprogram \$49,868 CHDO funds allocated to SNAP Resident Court renovation to TBRA?**

Background: In 2018, the City allocated \$250,420 CHDO (plus CDBG funds) to SNAP to renovate their Resident Court project at 1203 W 5<sup>th</sup>. SNAP completed all HOME-required renovations \$49,868 under budget. Prior to COVID, SNAP asked and CHHS verbally approved using these CHDO funds for bath surrounds, countertops, and main entry door replacement. Post COVID, these funds could help about 18 renters pay about 3 months rent.

Possible Options:

- No change – Allow SNAP to complete proposed repairs at Resident Court.
- To TBRA at Resident Court - Allow SNAP to use funds to COVID rent assistance at Resident Court.
- To TBRA at any SNAP Property - Allow SNAP to use funds for COVID rent assistance at any SNAP property.
- Recapture Funds – Add to a single TBRA rent assistance funding pool.

**We Recommend: Allow SNAP to decide between Option A (make planned repairs) or Option C (convert to TBRA for any SNAP rental property in City of Spokane).**

### TBRA Priorities

#### **Question: What additional priorities should we suggest to guide the use of limited TBRA funds?**

Background: We expect that rent assistance requests will far exceed available TBRA-COVID funds. TBRA-COVID eligibility requirements include renter households below 60% AMI who certify a financial hardship (i.e., income loss due to COVID or currently seeking rental housing). TBRA-COVID ineligible activities include rent for nonpermanent housing (hotel, shelter, or dorm), mortgage payments for homeowners, household income over 60% AMI, duplicate rent assistance, housing with mandated social services, and rental housing with no lease.

Possible Options:

- Provide via lottery of TBRA applicants
- ~~Provide to HOME-assisted and nonprofit-owned rental properties~~
- Prioritize household types like <30% AMI, families with school-age children, seniors, and/or disabled

- d. Prioritize those filing for unemployment after “Stay Home, Stay Healthy” (WorkSource can deliver this service)

**We Recommend:** Limit to low income (perhaps 50% AMI to be consistent with County HHAA and/or LIHEAP). Try to get help gets to those who need it rather than those receiving other sufficient resources. Consider possible need if later wave of layoffs. Ask landlords how many renters are behind in rent.

CHHS later received information from these property management agencies.

SNAP – Nonprofit

- 7% of countywide family projects have COVID-impacted income
- 3% of all countywide rentals have COVID-impacted income. Many tenants have rent or income subsidy not COVID impacted.
- 5% of all countywide renters had rent unpaid from January/February.

SHV - Nonprofit

- 17% rent loss in March. 23% rent loss in April. 40% projected rent loss for May.
- SBA PPP loan is bridging property manager’s payroll while rent collections are down.
- ¼ of tenants have employment income, primarily service industry. ¾ of tenants have government retirement or disability income.
- They are offering 90 day repayment plans for unpaid rent. Few renters have emergency savings.
- Tenant statements regarding unpaid rent: job lost/reduced, Governor says rent not required, other household expenses, fear/uncertainty, and landlord not providing immediate service.

Kiemle & Hagood – For-Profit

- 15 renters out of 249 units have unpaid rent from April (6% of total units). Many renters work in restaurants/retail. These renters are all in market rate properties.
- 8 renters made partial April rent payments and are on payment plans. Most of these renters lost jobs.
- 7 renters paid no rent in April. They are not communicating so managers don’t know if this is COVID related.
- It is unknown if these tenants can/will pay May and June rent. It will depend on when they return to work. Rent payment plans are available to these tenants.

**TBRA Delivery**

**Question: TBRA delivery is market, qualify renters, identify unpaid rent, and disburse funds. Should we add?**

- Should TBRA pay utilities (gas, electric, water, sewer, garbage) that are tenant’s responsibility but unpaid?

**We Recommend:** Pay only rent. Exclude utility payments that are tenant’s responsibility. There may be other sources for those payments. Poses risk of double payment for utilities.

- Should TBRA pay rent/utility costs due, but not paid, prior to the March 23 “Stay Home, Stay Healthy”?

**We Recommend:** Pay only rent due on/after April 1, 2020 (COVID related).

- When to pay landlords? Before, near, or after the June 4 eviction moratorium expiration?

**We Recommend:** Prompt payment supports landlord’s as a business. Start by paying April & May rent. In June, recertify household income and pay rent for those still below 60% AMI. When projecting annual household income, consider including Feb-April COVID-impacted months as well as later restored income. Note that committing to those behind in April could deny assistance to those who managed April rent but could not manage May or June rent.

- Should there be a maximum amount of TBRA rent/utility assistance (\_\_\_\_ months rent? \$\_\_\_\_ rent?)

**We Recommend:** Limit to 3 month’s rent assistance. Retain any unspent funds.

- Fund only rental units built after 1978 (due to LBP visual inspection requirement)

**We Recommend:** Most City housing is pre-1978. Provide the needed help. City/HUD must resolve.

**BRIEFING PAPER**  
Community, Housing & Human Services Board  
**Various Program Income Funding to Proclaim Liberty**  
May 6, 2020

---

**Subject:** Provide additional financial support to shovel-ready Proclaim Liberty project.

**Background**

In 2018, CHHS CDBG funding helped Proclaim Liberty purchase land at 1525 -1527 E Hartson for a new and expanded ECEAP early childhood learning facility and Liberty Park Terrace affordable rental housing expansion. In 2019, Washington State Legislature provided \$1,000,000 to Proclaim Liberty for ECEAP construction.

In 2019, Proclaim Liberty requested \$1,200,000 of CDBG grants and loans for ECEAP construction and site work serving both ECEAP construction and Liberty Park Terrace affordable rental housing expansion. On February 5, the CHHS Board approved \$1,200,000 CDBG funds but CHHS had only \$744,150 CDBG funds available. That left \$455,850 unfunded but CHHS could receive those funds in about 5 months from CDBG program income.

Recently, Proclaim Liberty finalized construction costs which increased up to \$790,882. This increase includes \$200,000 ECEAP construction contingency (8% of building's construction hard costs) and \$590,882 site excavation maximum contingency for trenching and grading at this rocky site. Not all construction contingency may be needed since this building has few construction variables. Not all trenching and grading contingency may be needed depending on actual difficulty to remove rock.

CHHS proposes to complete the 2/5/2020 CHHS Board CDBG grant allocation by using \$455,850 future CDBG program income to be applied to construction, trenching, and grading contingency expenses. CHHS also proposes to provide a new \$1,000,516 loan from "miscellaneous revenue" for construction costs. This loan will be repaid in about 3 years from Liberty Park Terrace affordable rental housing expansion permanent financing. For the \$1,000,516 loan, CHHS must access miscellaneous revenue, which is program income received from Rental Rehab, UDAG, and/or HOPE loans used to benefit low- and moderate-income Spokane residents.

Funding Sources		Funding Uses	
WA Legislature	\$1,000,000	Construction	\$2,409,634
CDBG Grant (2/5/2020)	\$ 744,150	Construction Contingency (may not be needed)	\$ 200,000
CHHS Loan (this action)	\$1,000,516	Rock Contingency (may not be needed)	\$ 590,882
CDBG Grant (2/5/2020)	\$ 455,850		
TOTAL	\$3,200,516	TOTAL	\$3,200,516

**Impact**

Project benefits 60 low-income children and 23 new affordable housing units.

**Actions**

Recommend project funding and authorize staff to select funding sources and terms.









# PROCLAIM LIBERTY'S NEW CAMPUS EXPANSION

Spokane, Washington



KIEMLE  
HAGOOD

**Affordable Housing Committee BRIEFING PAPER**  
Community, Housing & Human Services Board  
**Allocate HOME Multifamily Housing Program Funds**  
May 6, 2020

---

**Subject**

Affordable Housing Committee recommendation to allocate \$230,000 to FFC for the Homes XII affordable housing project.

**Background**

The CHHS Multifamily Housing Program (MFHP) loans HOME funds for development of permanent and affordable rental housing. FFC \$200,000 HOME funds from the Fall 2019 MFHP RFP. The Committee deferred this HOME application due to lack of other funding commitments. FFC later received needed funding commitments and amended their request for \$230,000 HOME funds for full project funding (staff underwrite update attached). This funding amount exceeds the standard CHHS HOME funding limit.

This FFC Homes XII project will construct 2 affordable rental homes for disabled renters at 2214 & 2216 E Cataldo. Both units will serve renters below 30% AMI for 30 years. These HOME funds are offered as loan forgiven over the 30-year affordability period.

This project has secured \$380,276 Commerce Housing Trust Fund and \$200,000 Federal Home Loan Bank funding. FFC has also committed \$20,000 of their own funds for operating reserves to subsidize operating losses caused by very low rents.

The Affordable Housing Committee unanimously recommends awarding \$230,000 HOME funds to this project, with conditions.

**Impact**

These HOME funds will create 2 units of affordable rental housing serving extremely low income and disabled renters in the City of Spokane.

**Actions**

Recommend that City Council commit \$230,000 HOME funds to the FFC Homes XII affordable housing project. Loan conditions include: a) allow HOME funding exceeding the standard CHHS HOME funding limit, b) operate the project as a Group Home, and c) capitalize \$50,000 of project reserves from non-HOME funds.

## April 2020 Update

### FFC HOME XII

Borrower Name: Foundation for the Challenged (FFC)

Project Location: 2214 & 2216 E Cataldo

HOME Funds Requested: \$230,000 (Grant)



Community, Housing, and Human  
Services Department  
808 W. Spokane Falls Blvd.  
Spokane, Washington 99201  
509.625.6325

#### Project Summary

This “Underwrite Update” provides new information on FFC’s \$230,000 HOME funding request for Affordable Housing Committee consideration and HOME funding recommendation.

In October 2019, Foundation for the Challenged (FFC), via development consultant Navarre+Pollowitz, applied for \$200,000 HOME Multifamily Housing funds to help construct 2 single-family rental homes at 2214 & 2216 E Cataldo. Each house would have 2-bedrooms, 1,042 square feet, fully fire sprinkled, and wheelchair accessible with level entry, roll-in shower, wide doorways, and wide halls. This project would serve 4 disabled and extremely low income (<30% AMI) renters referred by Washington State Developmental Disabilities Administration (DDA).

In November 2019, the Affordable Housing Committee reviewed and generally supported FFC’s request for \$200,000 HOME funds. FFC had also requested Federal Home Loan Bank and Commerce funds. CHHS had learned that FFC’s application for Commerce funding was in jeopardy. Consequently, the Committee deferred its HOME funding recommendation until those other funders awarded their funds.

In December 2019, FFC received the requested \$200,000 Federal Home Loan Bank grant. However, FFC did not receive Commerce \$380,276 grant due to an incomplete application. FFC asked that CHHS provide the \$380,276 of missing funds but that funding amount exceeds a statutory HOME funding limit.

In early 2020, FFC pursued a Washington Legislature appropriation to close their funding gap. In March, the Legislature awarded FFC funding via Commerce’ budget. FFC is awaiting Commerce’ allocation of these funds.

Recently, FFC asked that CHHS allocate HOME funds at \$230,000 (an increase from the original \$200,000 HOME request). This increased funding amount will offset increased project construction and soft costs.

#### Site & Development Schedule

The project site is 2 vacant and adjacent residential lots located at 2214 & 2216 E Cataldo. FFC owns both lots appropriately zoned as Residential Single Family.

FFC is currently selecting its general contractor. FFC proposes to start construction this spring and complete both houses by January 2021.

#### Project Financing

Navarre+Pollowitz updated the following project sources and uses. Total development costs increased by \$30,000, including: \$20,000 to construction, \$7,000 to architect, and \$3,000 to developer’s fee.



### Total Development Sources

Sources	Amount	Application Status	Funding Uses
City of Spokane HOME	<b>\$230,000</b>	Applied	Land, Soft Costs, Construction
Commerce Housing Trust Fund	\$380,276	Awarded	Construction, Soft Costs, Reserves
Federal Home Loan Bank	\$200,000	Awarded	Construction & Soft Costs
FFC	\$ 20,000	Committed	Reserves
<b>Total Sources</b>	<b>\$830,276</b>		

This project requests \$230,000 HOME funds provided as a grant over a 30-year affordability period. This amount exceeds the CHHS HOME funding limit of \$160,000. However, the Committee can recommend an exception to this CHHS HOME funding limit so long as total HOME funds do not exceed HUD's statutory HOME funding limit of \$417,824.

### Total Development Uses

Uses	Project Total	Staff Analysis
Acquisition (land only)	\$100,400	This land was purchased at appraised value.
Construction Hard Costs	\$532,488	\$256/sq foot based on architect estimate.
Architect Fee	\$47,000	9% of construction contract. Benchmark is <10%.
Developer Fee	\$81,000	7% of development costs. Benchmark is <10% of costs.
Misc. Costs	\$19,388	Title policy, recording, insurance, etc.
Reserves	\$50,000	Reserves capitalized from FFC and Commerce funds to cover operating costs that exceed rent revenue from extremely low-income renters.
<b>Total Dev Costs</b>	<b>\$830,276</b>	

FFC's architect estimated costs to construct these two houses, including state prevailing wages. Total development costs are \$415,138 for each 2-bedroom house. Reserves will be pre-capitalized to subsidize operating losses caused by low rents paid by 15-30% AMI renters.

### Operating Pro Forma

Cost Categories	Project Total	Analysis
Gross Rent Revenue	\$8,160/year	Tenants pay 30% of actual income as rent.
Management Expense	\$2,400 PUPA	62% of Effective Gross Income (skewed by low rents and few 2 units).
Replacement Reserves	\$165 PUPA	These contributions are low.
Services	N/A	None provided.
Income after Expenses (NOI)	Negative	Expenses exceed revenue (before reserves).
Debt Service	\$0	This project is 100% grant funded.
Cash Flow	\$0	Project cash flow is break even.

FFC proposes to serve renters between 15% and 30% AMI where tenants pay only 30% of their actual income as rent. FCC estimates this rent at \$340/month plus tenants pay all utilities. These rents are less than monthly project expenses resulting in negative cash flow. FFC will subsidize monthly losses from reserves capitalized by FFC and Commerce.

### Staff Recommendation

Conditions of any HOME loan:

1. Allow \$230,000 HOME funding which exceeds the \$160,000 CHHS HOME Funding limit.
2. Operate project as a Group Home to permit rent flexibility and extend rent reserve subsidy.
3. Capitalize all reserves from non-HOME funds prior to project completion.

**Affordable Housing Committee BRIEFING PAPER**  
Community, Housing & Human Services Board  
**Allocate HOME TBRA Funds for COVID Relief**  
May 6, 2020

---

**Subject**

Affordable Housing Committee recommendation to allocate up to \$500,000 HOME funds for Tenant Based Rent Assistance (TBRA) to assist COVID-impacted renters.

**Background**

COVID and “Stay Home, Stay Healthy” order has impacted jobs and incomes. For renters, Washington’s eviction moratorium has delayed eviction action until June 4. HUD recently released regulatory waivers including options to reprogram Community Housing Development Organizations (CHDO) set-aside funds. HUD also encouraged grantees to reprogram HOME funds to TBRA to help COVID-impacted low-income renters pay rent.

On April 22, the Affordable Housing Committee discussed City HOME funding and TBRA rent assistance to COVID-impacted renters. The Committee recommends reprogramming HOME funds, including CHDO funds, to TBRA rent assistance for COVID-impacted low-income renters. The Committee also offers advice (attached) on multiple TBRA-COVID policy questions.

**Impact**

HOME TBRA funds could help about 530 COVID-impacted low-income renters in the City of Spokane.

**Actions**

Recommend that City Council commit up to \$500,000 HOME funds to TBRA rent assistance to COVID-impacted low-income renters. Also, offer any TBRA-COVID program delivery advice to City administration and Council.

## HOME TBRA-COVID Program Delivery

### COVID & HUD's HOME Waivers including TBRA

Due to COVID, Gov. Inslee orders "Stay Home, Stay Healthy" on 3/23/2020 and an eviction moratorium that expires June 4, 2020, *unless further extended*. Due to COVID, HUD encourages HOME grantees to reprogram HOME funds for other uses including Tenant Based Rent Assistance (TBRA) for a limited time. HUD's encouragement includes the ability to reprogram all CHDO funds to any HOME-eligible activity, including TBRA. TBRA-COVID is limited-time (not to exceed 12/31/2020) payment of rent and utilities (but not mortgage payments) for renters below 60% AMI experiencing financial hardship due to COVID 19.

### TBRA Funding

#### **Question: How much HOME funds do we reprogram to TBRA-COVID?**

Background: CHHS currently has \$1,436,237 HOME funds on hand (\$397,986 CHDO and \$1,038,251 Program Income from program years 2017-2019). Full TBRA funding could help about 530 renters pay about \$900/month rent for 3 months (April – June). Note that CHHS will receive new HOME funds on July 1, 2020 and I expect to offer **about** \$1,500,000 HOME funds in our Fall 2020 HOME RFP for affordable rental housing development.

Possible Options:

- Preprogram all ~~\$397,986~~ all available CHDO but save other funds for HOME projects or later COVID rent assistance
- Reprogram \$500,000 (all available CHDO plus some Program Income) but save other funds for HOME projects or later COVID rent assistance
- Reprogram all \$1,436,237 CHDO & Program Income funds

**We Recommend: Option B at \$500,000 (all available CHDO plus Program Income) to TBRA.**

#### **Question: Do we reprogram \$49,868 CHDO funds allocated to SNAP Resident Court renovation to TBRA?**

Background: In 2018, the City allocated \$250,420 CHDO (plus CDBG funds) to SNAP to renovate their Resident Court project at 1203 W 5<sup>th</sup>. SNAP completed all HOME-required renovations \$49,868 under budget. Prior to COVID, SNAP asked and CHHS verbally approved using these CHDO funds for bath surrounds, countertops, and main entry door replacement. Post COVID, these funds could help about 18 renters pay about 3 months rent.

Possible Options:

- No change – Allow SNAP to complete proposed repairs at Resident Court.
- To TBRA at Resident Court - Allow SNAP to use funds to COVID rent assistance at Resident Court.
- To TBRA at any SNAP Property - Allow SNAP to use funds for COVID rent assistance at any SNAP property.
- Recapture Funds – Add to a single TBRA rent assistance funding pool.

**We Recommend: Allow SNAP to decide between Option A (make planned repairs) or Option C (convert to TBRA for any SNAP rental property in City of Spokane).**

### TBRA Priorities

#### **Question: What additional priorities should we suggest to guide the use of limited TBRA funds?**

Background: We expect that rent assistance requests will far exceed available TBRA-COVID funds. TBRA-COVID eligibility requirements include renter households below 60% AMI who certify a financial hardship (i.e., income loss due to COVID or currently seeking rental housing). TBRA-COVID ineligible activities include rent for nonpermanent housing (hotel, shelter, or dorm), mortgage payments for homeowners, household income over 60% AMI, duplicate rent assistance, housing with mandated social services, and rental housing with no lease.

Possible Options:

- Provide via lottery of TBRA applicants
- ~~Provide to HOME-assisted and nonprofit-owned rental properties~~
- Prioritize household types like <30% AMI, families with school-age children, seniors, and/or disabled

- d. Prioritize those filing for unemployment after “Stay Home, Stay Healthy” (WorkSource can deliver this service)

**We Recommend: Limit to low income (perhaps 50% AMI to be consistent with County HHAA and/or LIHEAP). Try to get help gets to those who need it rather than those receiving other sufficient resources. Consider possible need if later wave of layoffs. Ask landlords how many renters are behind in rent.**

CHHS later received information from these property management agencies.

SNAP – Nonprofit

- 7% of countywide family projects have COVID-impacted income
- 3% of all countywide rentals have COVID-impacted income. Many tenants have rent or income subsidy not COVID impacted.
- 5% of all countywide renters had rent unpaid from January/February.

SHV - Nonprofit

- 17% rent loss in March. 23% rent loss in April. 40% projected rent loss for May.
- SBA PPP loan is bridging property manager’s payroll while rent collections are down.
- ¼ of tenants have employment income, primarily service industry. ¾ of tenants have government retirement or disability income.
- They are offering 90 day repayment plans for unpaid rent. Few renters have emergency savings.
- Tenant statements regarding unpaid rent: job lost/reduced, Governor says rent not required, other household expenses, fear/uncertainty, and landlord not providing immediate service.

Kiemle & Hagood – For-Profit

- 15 renters out of 249 units have unpaid rent from April (6% of total units). Many renters work in restaurants/retail. These renters are all in market rate properties.
- 8 renters made partial April rent payments and are on payment plans. Most of these renters lost jobs.
- 7 renters paid no rent in April. They are not communicating so managers don’t know if this is COVID related.
- It is unknown if these tenants can/will pay May and June rent. It will depend on when they return to work. Rent payment plans are available to these tenants.

**TBRA Delivery**

**Question: TBRA delivery is market, qualify renters, identify unpaid rent, and disburse funds. Should we add?**

- Should TBRA pay utilities (gas, electric, water, sewer, garbage) that are tenant’s responsibility but unpaid?

**We Recommend: Pay only rent. Exclude utility payments that are tenant’s responsibility. There may be other sources for those payments. Poses risk of double payment for utilities.**

- Should TBRA pay rent/utility costs due, but not paid, prior to the March 23 “Stay Home, Stay Healthy”?

**We Recommend: Pay only rent due on/after April 1, 2020 (COVID related).**

- When to pay landlords? Before, near, or after the June 4 eviction moratorium expiration?

**We Recommend: Prompt payment supports landlord’s as a business. Start by paying April & May rent. In June, recertify household income and pay rent for those still below 60% AMI. When projecting annual household income, consider including Feb-April COVID-impacted months as well as later restored income. Note that committing to those behind in April could deny assistance to those who managed April rent but could not manage May or June rent.**

- Should there be a maximum amount of TBRA rent/utility assistance (\_\_\_\_ months rent? \$\_\_\_\_ rent?)

**We Recommend: Limit to 3 month’s rent assistance. Retain any unspent funds.**

- Fund only rental units built after 1978 (due to LBP visual inspection requirement)

**We Recommend: Most City housing is pre-1978. Provide the needed help. City/HUD must resolve.**

**BRIEFING PAPER**  
Community, Housing & Human Services Board  
**Substantial Amendment: 2019 Action Plan**  
May 6, 2020

---

**Subject:**

Amendment to projects listed in the 2019 Annual Action Plan and associated public comment period.

**Background:**

CHHS can add new funding allocations to an Action Plan following a Substantial Amendment and public comment, per the Citizen Participation Plan. CHHS requests these new funding allocations.

- Allocate up to \$500,000 HOME funds to Tenant Based Rental Assistance (TBRA) for COVID rent relief at various locations within City of Spokane.
- Allocate approximately \$1,000,000 Miscellaneous Revenues to Proclaim Liberty for ECEAP and affordable rental housing development located at 1525-1527 E Hartson.
- Allocate \$780,000 HOME funds to Community Frameworks' Sinto Commons project to construct 47 affordable rental housing units, including 11 HOME-assisted units, at 441-509 W Sinto.
- Allocate \$230,000 HOME funds to FFC' Homes XII project to construct 2 affordable rental housing units, both HOME-assisted, at 2214-2216 E Cataldo.

**Timeline:**

Open virtual public hearing and comment period on May 6. Per the CARES Act, public comment will be accepted for 5 days (ending May 12, 2020).

**Impact:**

No significant impact as the substantial amendment is an opportunity for the City to engage with the community for feedback related to affordable housing.

**Actions:**

Open public comment period. Authorize staff to close public comment on May 12, respond to any public comment, and implement these projects.