



DRAFT Plan for Public Comments. Funding levels shown are estimated amounts pending final HUD allocation.

City of Turlock Annual Action Plan For CDBG funds & Turlock/Stanislaus Urban County HOME Consortium funds



Fiscal Year 2020-2021

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Annual Action Plan

AP-15 Expected Resources

Introduction

During the 2020 fiscal year, the City of Turlock anticipates receiving \$657,574 in Community Development Block Grant (CDBG) funding as an entitlement jurisdiction. The City of Turlock/Stanslaus County HOME Consortium anticipates receiving \$1,363,238 in HOME Investment Partnerships Program (HOME) funds. The City of Turlock anticipates having a balance of \$650,000 approximately in CalHome State funding to be used for down payment assistance activities. The table below provides a breakdown of these anticipated resources, which are based on the Fiscal Year 2020-2021 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	\$657,574	550,000	995,000		2,628,000	Funds will be utilized for affordable housing, temporary relocation assistance, infrastructure, Fair Housing, Public Services, and Administration.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab	\$1,363,238	50,000			5,440,000	Funds will be utilized for affordable housing, rehabilitation, and

		Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA						down-payment assistance for first-time homebuyers.
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Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Leveraging HUD funding allows the City and HOME Consortia to bring in local, state, and other sources to combine with federal financial resources to maximize the reach and impact of the City's HUD-funded programs. The Federal HOME program requires a matching contribution from non-federal resources of at least 25 percent of program disbursements. This is equivalent to \$1 of non-federal funds for every \$4 of federal HOME funds.

City of Turlock will continue to use State HOME and CalHome Program Income as additional funding sources for the first time home buyer program. In previous years the city received grant funds from the State for HOME and CalHome programs.

In previous years, combinations of Redevelopment Agency Housing Set-Aside funds, as well as Low-Income Housing Tax Credits have been used to construct rental housing or rehabilitation projects. Some of these funds were eligible and used as matching for the HOME program. Turlock and the HOME Consortium will continue to look for other funds to match and leverage CDBG and HOME funds.

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

The City of Turlock Redevelopment Agency owns a parcel with a small office building. The building is currently leased for \$1.00 per year to Haven Women’s Center. The intent of the five-year lease has been to bring much needed domestic violence education and legal services to City of

Turlock and overcome the transportation barrier of clients and families traveling the 15 miles to Modesto to get to much needed services.

AP-20 Annual Goals and Objectives

Goals Summary Information

#	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and Improve Supply of Affordable Housing	2020	2024	Affordable Housing	<ul style="list-style-type: none"> Affordable Housing 	CDBG: HOME:	40 households
2	Work to End and Prevent Homelessness	2020	2024	Homeless	<ul style="list-style-type: none"> Homeless Services 	CDBG: HOME:	1 facility
3	Improve Infrastructure and Public Facilities	2020	2024	Non-Housing Community Development	<ul style="list-style-type: none"> Public Infrastructure and Facility Improvement 	CDBG: HOME:	1 facility
4	Provide Public Services	2020	2024	Non-Homeless Special Needs	<ul style="list-style-type: none"> Public Services Community and Economic Development 	CDBG: \$200,000	XX persons
5	Community Emergency Response Program	2020	2024	Emergency	<ul style="list-style-type: none"> Community Emergency Responses Public Services Community and Economic Development 	CDBG Cares: \$386,829	50 persons
6	Administration	2020	2024	Administration	<ul style="list-style-type: none"> Public Infrastructure and Facility Improvement Homeless Services Public Services 	CDBG: HOME:	1 Other

					<ul style="list-style-type: none"> Affordable Housing 		
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Goal Descriptions

1	Goal Name	Increase and Improve Supply of Affordable Housing
	Goal Description	This goal will work to acquire real property and/or units in order for them to be used to increase the number of affordable housing units in Turlock. Projects under this goal will support both renter- and owner-occupied units in rehabilitation in the aim to increase the value and bring the housing unit up to code. The City will offer loans and grants to maintain single and multifamily affordable housing stock for low- and moderate-income households. Projects under this goal may also provide first-time homebuyer assistance.
2	Goal Name	Work to End and Prevent Homelessness
	Goal Description	Funding towards this goal will support organizations providing shelter and services for those experiencing homelessness; this goal may include emergency shelter, transitional, permanent supportive, and rapid re-housing services.
3	Goal Name	Improve Infrastructure and Public Facilities
	Goal Description	This goal may provide funding for projects that will improve sidewalks, streets, curbs, gutters, and sewers.
4	Goal Name	Provide Public Services
	Goal Description	This goal will address basic needs as well as provide important services to the community. Projects and activities under this goal may provide meals at congregate sites and home delivery to seniors, provide recreational services,
5	Goal Name	Community Emergency Response Program
	Goal Description	Projects under this goal will support small businesses and agencies address community emergency needs as a result of pandemic related issues.

6	Goal Name	Administration
	Goal Description	Administration for CDBG and HOME programs.

AP-35 Projects

Introduction

As shown in the previous section, AP-20 Annual Goals and Objectives, Stanislaus Urban County, the City of Turlock, and the HOME Consortium have identified goals to address housing and community development needs for Fiscal Year 2020-2021. During this year, the Urban County, the City of Turlock and the HOME Consortium will work towards achieving all of the goals outlined above. Below are the proposed projects funded with FY 2020-2021 federal funding from the Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME)

#	Project Name
1	Housing Rehabilitation (CDBG) 2020-2021
2	Temporary Relocation (CDBG) 2020-2021
3	We Care Program -Turlock (CDBG-PSG) 2020-2021
4	United Samaritans Foundation-Food Box (CDBG-PSG) 2020-2021
5	United Samaritans Foundation-Senior Meals (CDBG-PSG) 2020-2021
6	City of Turlock Recreation (CDBG-PSG) 2020-2021
7	Center for Human Services (CDBG-PSG) 2020-2021
8	Project Sentinel (CDBG-PSG) 2020-2021
9	First Time Home Buyer Loans (CDBG) 2020-2021
10	Public Improvement (CDBG) 2020-2021
11	Affordable Housing Development (CDBG) 2020-2021
12	Program Administration (CDBG) 2020-2021
13	CHDO (HOME) 2020-2021
14	Consortium Affordable Housing (HOME) 2020-2021
15	Housing Rehabilitation (HOME) 2020-2021

16	First Time Home Buyer Loans (HOME) 2020-2021
17	Consortium Administration (HOME) 2020-2021

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

There are three specific HUD goals for the CDBG program. They are:

- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities

The Priority Needs section within this Consolidated Plan identifies the key priority needs in both the Urban County and the City of Turlock. These priority needs are reflected in the projects identified above. More specifically, the needs expressed by data in the Needs Assessment and Market Analysis are taken into account when considering projects to allocate resources to.

Obstacles in addressing underserved needs are:

- A lack of available funds and resources
- The constraints and restrictions of the funding programs requirements

AP-38 Project Summary

Project Summary Information

Project Name	Housing Rehabilitation (CDBG) FY 20-21
Target Areas	Turlock
Goals Supported	Affordable Housing
Needs Addressed	Rehabilitation
Funding	CDBG: \$410,000
Description	Rehabilitation of existing housing in Turlock with loans and grants to maintain single and multifamily affordable housing.

Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	9 units
Location Description	City of Turlock
Planned Activities	Rehabilitation of existing housing in Turlock FY 20-21

Project Name	
Temporary Relocation (CDBG) FY 20-21	
Target Areas	Turlock
Goals Supported	Affordable Housing
Needs Addressed	Temporary Relocation
Funding	CDBG: \$3,000
Description	Funding for temporary relocation of households undergoing housing rehabilitation. These funds are used to provide assistance with the costs of temporary relocation during construction of their homes.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	3 units
Location Description	City of Turlock
Planned Activities	Temporary relocation for Turlock projects

Project Name	
We Care Program- Turlock (CDBG-PSG) FY 20-21	
Target Areas	Turlock
Goals Supported	Public Services
Needs Addressed	Public Services

Funding	CDBG: \$20,000
Description	The We Care Program serves chronically homeless men over the age of 18. The shelter has the capacity to shelter 49 men at night. The shelter provides a safe and stable environment for individuals who would otherwise be sleeping on the street or in places not meant for human habitation.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	330 homeless men over 18 years old
Location Description	City of Turlock
Planned Activities	Emergency Men's Shelter

Project Name	
United Samaritans Foundation- Food Box (CDBG-PSG) FY 20-21	
Target Areas	Turlock
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$20,000
Description	The food box program provides food assistance to income eligible individuals and families in Turlock who are experiencing food insecurity and lack sufficient quantities of food. Food boxes are distributed on the las Tuesday and Friday of every month. Homeless individuals are eligible for a food box every month. Each box is filled with ample provisions to feed every person in the family three meals a day for three days.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	1,000
Location Description	City of Turlock
Planned Activities	Emergency food box program

Project Name		United Samaritan's Foundation- Senior Congregate Lunch (CDBG-PSG) FY 20-21
Target Areas	Turlock	
Goals Supported	Public Services	
Needs Addressed	Public Services	
Funding	CDBG: \$20,000	
Description	The senior congregate meal program aims to provide age-appropriate nutrient dense mid-day meals to residents 60 years of age and older. The congregate meals offer comprehensive nutritionally planned meals and a social element to help seniors create friendship and relationships.	
Target Date	6/30/2021	
Estimate the number and type of families that will benefit from the proposed activities	35	
Location Description	City of Turlock	
Planned Activities	Senior Congregate Meal Program	

Project Name		City of Turlock Recreation (CDBG-PSG) FY 20-21
Target Areas	Turlock	
Goals Supported	Public Services	
Needs Addressed	Public Services	
Funding	CDBG: \$15,000	
Description	Turlock Recreation Services strengthens the community's fabric, health and well-being, economic base, and security. Through quality programming and implementation, Recreation Services provides safe, supervised activities for residents of all ages. Families and individuals have the opportunity to enhance their lives by participating in fitness programs, support activities, family events, community traditions, arts, social and educational activities, and a wide range of enrichment classes. Scholarships are available for participation. Participants must be 18 years of age or younger or 62 years of age and older.	
Target Date	6/30/2021	

Estimate the number and type of families that will benefit from the proposed activities	100 individuals
Location Description	City of Turlock
Planned Activities	Recreation for all scholarship program

Project Name	
Center for Human Services (CDBG-PSG) FY 20-21	
Target Areas	Turlock
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$15,000
Description	Street outreach and navigation/case management services specifically targeted toward Turlock youth, ages 13-24 years of age who are homeless and unsheltered.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	15 individuals
Location Description	City of Turlock
Planned Activities	Street Outreach/Navigation

Project Name	
Project Sentinel (CDBG-PSG) FY 20-21	
Target Areas	Turlock
Goals Supported	Public Services
Needs Addressed	Public Services
Funding	CDBG: \$15,000

Description	Project Sentinel will provide comprehensive Fair Housing services of complaint investigation, community outreach and education, problem solving and dispute resolution. Fair Housing is achieved by informing the community and target populations about fair housing and the respective housing rights and responsibilities. Complaint/problem resolutions are achieved through education, conciliation and enforcement referral. Services are provided by trained counselors who advise callers of their rights and help the parties reach resolutions, civil rights protection, rescind evictions, refunded deposits, improved code compliance, privacy rights respected, and predatory lending practices averted.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	125 Individuals
Location Description	City of Turlock
Planned Activities	Fair Housing Services

Project Name	First time Home Buyer Loans (CDBG) FY 20-21
Target Areas	Turlock
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	CDBG: \$200,000
Description	Down payment assistance program for first time home buyers. Funds will be provided to income eligible clients for the purchase of their first home. Funds can be used for down payment and or closing costs associated with the loan.
Target Date	6/30/2021

Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	City of Turlock
Planned Activities	Down payment assistance program for first time home buyers.

Project Name	
Public Improvements (CDBG) FY 20-21	
Target Areas	Turlock
Goals Supported	Public Infrastructure and Facility Improvement Affordable Housing
Needs Addressed	Improve Public Infrastructure Affordable Housing
Funding	CDBG: \$200,000
Description	Rehabilitation work
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	1 Facility
Location Description	City of Turlock
Planned Activities	Rehabilitation work

Project Name	
Affordable Housing Development (CDBG) FY 20-21	
Target Areas	Turlock
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing

Funding	CDBG: \$300,000
Description	Acquisition and or rehabilitation of real property for affordable housing. Property will be acquired and rehabilitated to meet basic housing standards. Acquisition of property will help increase and maintain affordable housing stock in Turlock.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	2 household
Location Description	City of Turlock
Planned Activities	

Project Name	
Program Administration (CDBG) FY 20-21	
Target Areas	Turlock
Goals Supported	Administration
Needs Addressed	Public Infrastructure and Facility Improvement Affordable Housing Public Services Homeless Services
Funding	CDBG: \$131,515
Description	Program Administration
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	City of Turlock
Planned Activities	Program Administration

Project Name	Community Emergency Response Program (CDBG-CARES) FY 20-21
Target Areas	Turlock
Goals Supported	Provide Public Services
Needs Addressed	Public Services
Funding	CDBG: \$386,829
Description	<p>This program will provide Turlock an avenue to address COVID 19 related emergencies in the community. Funding may be utilized for the following:</p> <p>Buildings and Improvements, Including Public Facilities Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. <i>See section 105(a)(2) (42 U.S.C. 5305(a)(2)); 24 CFR 570.201(c).</i></p> <p>Rehabilitate a community facility to establish an infectious disease treatment clinic. Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.</p> <p>Rehabilitation of buildings and improvements (including interim assistance). <i>See section 105(a)(4) (42 U.S.C. 5305(a)(4)); 24 CFR 570.201(f); 570.202(b).</i></p> <p>Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery</p> <p>Construct a facility for testing, diagnosis, or treatment</p> <p>Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system.</p> <p>Make interim improvements to private property</p> <p>Public Services: (Max \$203,948)</p> <p>Provision of new or quantifiably increased public services. <i>See section 105(a)(8) (42 U.S.C. 5305(a)(8)); 24 CFR 570.201(e).</i></p>

	<p>Provide testing, diagnosis or other services at a fixed or mobile location.</p> <p>Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.</p> <p>Provide equipment, supplies, and materials necessary to carry-out a public service.</p> <p>Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.</p> <p>Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.</p>
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	150 Individuals/150 Households
Location Description	Consortium service area
Planned Activities	Public Services, Property Acquisition and Rehabilitation

Project Name	CHDO (HOME) FY 20-21
Target Areas	Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, Unincorporated Stanislaus County
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	HOME: \$204,486
Description	Allocated funds for distribution to eligible CHDO's to carryout housing development activities. Funding will be made available to eligible Community Housing Development Organizations (CHDO) to acquire and or develop affordable housing.
Target Date	6/30/2021

Estimate the number and type of families that will benefit from the proposed activities	1 low income household
Location Description	Consortium service area
Planned Activities	Community Housing development Organization (CHDO) projects

Project Name	
Consortium Affordable Housing (HOME) FY 20-21	
Target Areas	Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, Unincorporated Stanislaus County
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	HOME: \$622,428
Description	Acquisition of property and or land for the development of affordable housing. Acquire and or rehabilitate properties and or covenants to provide affordable rental housing to income eligible clients. Properties may be transferred to non-profit agencies to provide property management services. May also purchase covenants.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	7 units
Location Description	Consortium service area
Planned Activities	Acquisition of property and or land for the development of affordable housing.

Project Name	
Housing Rehabilitation (HOME) FY 20-21	
Target Areas	Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, Unincorporated Stanislaus County
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing

Funding	HOME: \$100,000
Description	Consortium wide housing rehabilitation for both owner and renter occupied units and delivery costs, The Consortium will offer loans and grants to maintain single and multifamily affordable housing stock for low to moderate income clientele. The program serves as a way to preserve and maintain affordable housing units. Rehabilitate existing housing.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	4 households
Location Description	Consortium service area
Planned Activities	Consortium wide housing rehabilitation for both owner and renter occupied units and delivery costs.

Project Name	
First Time Home Buyer Assistance (HOME) FY 20-21	
Target Areas	Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, Unincorporated Stanislaus County
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	HOME: \$300,000
Description	First Time Home Buyer Assistance. Down Payment assistance program for first time home buyers. HOME funds will be provided to income eligible clients for the purchase of their first home. Funds can be used fir down payment and or closing costs associated with the loan.
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	10 low income households
Location Description	Consortium service area
Planned Activities	Down payment assistance program for first time home buyers.

Project Name	Consortium Administration (HOME) FY 20-21
Target Areas	Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, Waterford, Unincorporated Stanislaus County
Goals Supported	Affordable Housing
Needs Addressed	Affordable Housing
Funding	HOME: \$136,324
Description	HOME program administration
Target Date	6/30/2021
Estimate the number and type of families that will benefit from the proposed activities	N/A- Program Administration
Location Description	Consortium members
Planned Activities	HOME Program Administration

AP-50 Geographic Distribution

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Stanislaus County and Turlock do not have plans to pursue any official HUD designated geographic based priority areas. Funds will be allocated within each jurisdiction based on program eligibility and in accordance with priority needs and goals outlined in this section.

AP-55 Affordable Housing

Introduction

The tables in this section provide estimates on the number of homeless, non-homeless, and special needs households to be provided affordable housing during the program year and the number of affordable units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units.

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	3
Acquisition of Existing Units	0
Total	12

Discussion

Housing assistance and programs were identified as a community need via the Consolidated Plan process. In Fiscal Year 2020-2021, the City of Turlock and the HOME Consortium will continue to use funds available to address the variety of housing needs within the jurisdiction. Although the City of Turlock and the HOME Consortium have identified housing assistance and housing programs as priorities, the City of Turlock and HOME Consortium members' ability to contribute toward the provision and development of affordable housing programs/projects has been drastically limited both by the State of California's elimination of redevelopment agencies which was the most significant tool for the provision of affordable housing, economic development, job creation, and elimination of blight, as well

as by the steadily increasing price of the housing market in terms of land, labor, construction, and materials.

AP-60 Public Housing

Introduction

The City of Turlock, Stanislaus Urban County, and the Stanislaus Regional Housing Authority (Housing Authority) continue to have a close working relationship and meet on an as-needed basis to discuss concerns relevant to public housing and other housing matters. The Housing Authority has three public housing developments in Turlock in addition to the more than 1,000 Housing Choice Vouchers in use in Turlock. The City will continue to work with the Housing Authority and other public and private housing and social service agencies to foster public housing improvements and resident initiatives.

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

The Housing Authority's mission is committed to addressing the unmet housing needs of residents and communities in the county, consistent with Federal, State, and local law. The Housing Authority owns and operates public housing units in addition to operating the Housing Choice Voucher Program.

The Housing Authority operates 647 conventional public housing units throughout Stanislaus County in five Asset Management Properties (AMP). AMP 1 contains a total of 149 units located in Oakdale, Turlock, Ceres, and Hughson. AMP 2 contains a total of 66 units located in Newman, Patterson, and Westley. The remaining 432 units are located in AMPs 3, 4, and 5 in the City of Modesto.

The Housing Authority operates several affordable housing programs in addition to Public Housing, including year-round Farm Labor Housing, Seasonal Migrant Farm Worker Housing, and several smaller affordable housing properties including units funded under the Neighborhood Stabilization Program and the Housing Choice Voucher Program. These affordable housing programs will continue to operate in the 2020-2021 program year.

The Housing Authority is always working to increase the stock of affordable housing in Stanislaus County through other available resources, programs, and partnerships as opportunities arise.

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

The Housing Authority previously implemented a services and communication "quality control" system that provides the Housing Authority with immediate customer feedback and identifies areas that may need improvement. The Housing Authority has also implemented a resident education program with regularly scheduled meetings and written communications on agency policy, rules, and leases.

Efforts to improve communications with residents and program participants include on site resident training/informational meetings, regular newsletters and flyers.

Efforts to improve communications with residents and program participants include: on site resident training/informational meetings, regular newsletters and flyers. The Housing Authority has implemented a “curbside” appearance program. The focus of the program is the exterior of buildings, parking areas, play grounds and other areas of the complexes. Rodent and insect problems are addressed when residents report a problem and/or on Annual Inspections. In an effort to better education residents concerning these problems, information is regularly provided through the Housing Authority newsletter. These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication

Further, the Housing Authority has a Resident Advisory Board (RAB) which represents the residents assisted by the agency. The RAB assists in the development of the Housing Authority’s five-year Plan. Resident involvement will continue to be supported in an effort to enhance the service delivery by taking into account input from those with lived experience.

These actions have assisted the Housing Authority in creating an atmosphere which emphasizes customer satisfaction and communication.

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

The Housing Authority is not designated as a troubled Housing Authority.

AP-65 Homeless and Other Special Needs Activities

Homeless services are a high priority and homeless prevention activities are a medium priority. The ultimate goal is to increase housing stability and decrease incidents of homelessness in Stanislaus County by targeting funds to populations most in need, meeting both the immediate and long-term needs of the homeless, and avoiding the duplication of services by coordinating with service providers and the CoC. The focus of CoC funding has been to provide permanent supportive housing (PSH) for the chronically homeless, homeless veterans, and for homeless youth out of foster care.

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

While the primary source of homeless funds in the Stanislaus Urban County is ESG funds, the City of Turlock is not an ESG entitlement jurisdiction. The City of Turlock’s strategy remains in building the

capacity of local nonprofits that provide services to the homeless. The City of Turlock will continue to engage those nonprofits in projects that build both capacity as well as options for them to generate nonfederal match to compete for ESG funds from Stanislaus Urban County.

The CoC will continue the implementation of the Coordinated Entry System (CES) as the to match those individuals experiencing homelessness to the services that best suit their needs including connecting homeless to housing opportunities. The CoC formed a CES Task Force that will continue to meet regularly to assist with the continued evolution and implementation of the CES and address any issues that arise. The CoC will provide continued training for participating service providers and continue developing any necessary tools to effectively manage the system. This matching of appropriate needs is the most effective use of resources and minimizes bottlenecks in the service delivery system.

The CoC has several programs that focus on outreach and individuals and family engagement. The Community Assessment, Response, and Engagement (CARE) Team's mission is to facilitate the expedited identification, assessment, and linkage of homeless individuals to housing and supportive services within Stanislaus County subject to the provisions of the Welfare and Institutions Code (WIC) section 18999.8. This WIC Code section was added effective January 1, 2018, to authorize California counties to establish multidisciplinary personnel teams to address homelessness within the county. Every CARE Team member is tasked with conducting outreach and engagement. The strength of the CARE Team comes from the ability to leverage experience and expertise from multiple disciplines when assisting a CARE client. During the initial and on-going client contacts, rapport is developed, and client issues are identified and prioritized. When issues are general, CARE Team members will link the client to a resource; whereas when the need is more specific, the relevant team member provides specialized care. For example, when the CARE Team identifies a CARE client who has agreed to take a mental health assessment, the CARE Team clinician will respond to the location to provide brief counseling, and schedule and conduct the mental health assessment. The need for this type of service was identified during the CARE planning process, and by implementing this, the CARE program is utilizing an innovative approach to meet the needs of the CARE population.

Designed as a first step in a Continuum of Care (CoC) plan of assistance, the ESG program strives to address the immediate needs of persons residing on the street and needing emergency shelter and transitional housing, as well as assisting their movement to independent living. While flexible in terms of serving all homeless subpopulations and preventing persons from becoming homeless, ESG program legislation and implementing regulations limit the types of activities and amounts of funds that can be spent on different activities.

Addressing the emergency shelter and transitional housing needs of homeless persons

All individuals and families receiving services through the CoC are receiving care that is individualized. Meaning whether the individual/family is in an emergency shelter or a transitional shelter the most effective support the CoC can offer is that which directly meets the needs of the individual/family as opposed to a "one-sized-fits-all" type of support.

The service providers and stakeholders involved in the CoC meet monthly to discuss issues and concerns that arise, this discussion may also include a look forward to needs and gaps experienced by a specific sub-population. These meetings monthly meetings are an effective place to coordinate the support and care for those individuals and families that are in an emergency shelter or a transitional shelter. Service providers, community members, faith based organizations, government agencies make up the Turlock Community Collaborative (TCC). This group assist the Turlock is determining and addressing the needs of the homeless in the city. The TCC is a recognized committee of CoC.

Short-term strategies for addressing the emergency and transitional housing needs of homeless persons include but are not limited to the following:

- Expanding street outreach efforts to prioritize the needs of persons living outside, especially those whose health is compromised.
- Sustaining existing emergency shelter inventory and helping those in shelter exit to permanent housing through rental assistance and case management addressing specific barriers to obtaining and retaining housing.
- Try to expand the capacity of non-profit agencies that assist emergency shelter and transitional housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The Stanislaus Urban County and City of Turlock Homeless Strategy places a high priority on providing rental assistance and housing relocation and stabilization services to persons and households experiencing homelessness. The City of Turlock recognizes that without ESG entitlement funding, the City must apply competitively through the State of California Department of Housing and Community Development (HCD). The City is working to assist nonprofits in building capacity so that they can effectively compete for ESG funds to serve the community.

The Continuum of Care (CoC) strategies encourage providing homeless households with housing quickly and in conjunction with supportive services which are of greatest need to support stable housing; other needs households may have should be addressed through existing mainstream resources available in the community. This reflects an emphasis on both homelessness prevention and rapid re-housing.

Permanent housing destinations generally include an apartment or house, permanent supportive housing, or living permanently with friends or family. A return to homelessness is indicated by a new entry in a homeless residential program (emergency shelter, transitional housing, rapid re-housing)

within 365 days after exiting to permanent housing.

Ending the cycle of homelessness requires a combination of this rental assistance, homeless prevention, re-housing, and permanent supportive housing programs along with long-range homeless reduction strategies.

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.

The State has policies in place that require health care facilities to participate in regional planning meetings and develop a specific document to identify best practices for the post-hospital transition of homeless patients, methods to establish and support effective communications between hospitals and stakeholders regarding this transition, and the identification of resources. Local health care facilities have specific protocols in place requiring a safe discharge for all patients. In 2008, the Stanislaus County Public Health Agency reestablished the task force to review the current protocol in place and address any gaps in services necessary to ensure successful discharge planning services. The Public Health Agency has become actively involved in the Continuum of Care (CoC) and working toward developing liaisons with housing services agencies in the CoC to update the existing discharge planning protocol. Currently in place there are discharge planning social workers on staff at the hospitals who work with service providers to locate appropriate housing and prevent the release of patients to the streets or to HUD McKinney-Vento funded emergency shelters, transitional, or permanent housing units.

Representatives from Behavioral Health and Recovery Services (BHRS) and the Community Services Agency (CSA) regularly attend the monthly CoC meetings and are active participants in discharge coordination planning, in particular for homeless individuals, throughout Stanislaus County, including Turlock.

For adults recently released from custody, Stanislaus County addresses housing issues through the Day Reporting Center (DRC). The Sheriff's Department conducts Probation Orientation Meetings at the DRC in which several programs have participated in the past including Solidarity, Teen Challenge, and Gospel Mission. As a result of the CoC's coordination with the Probation Department, the Stanislaus County Sheriff's and Probation Departments also recently began a diversion program, where homeless individuals who would otherwise be jailed for minor crimes are able to stay at the Salvation Army shelter facility, where they receive shelter and case management services. Collaboration with public service

providers and the Probation Department is ongoing.

AP-75 Barriers to affordable housing

Introduction

The Stanislaus Urban County works with the City of Turlock, who is the lead agency for the City of Turlock/Stanslaus County HOME Consortium in efforts to provide affordable housing opportunities. One of the main barriers to affordable housing, both rental and homeownership, has been the supply of affordable housing units. For residents that are renting, the rents in the area have increased and made it difficult for renters to move or new renters to find housing units. In the area of homeownership, many residents are outpriced and cannot afford to purchase the homes that are available. Some of the barriers that impact the availability of affordable housing are outlined below.

Accessory Dwelling Units (ADUs): Separate living quarters on a property (also called a “granny flat” or “guesthouse” can add additional housing units into single-family residential neighborhoods. Government regulations of ADUs can reduce or eliminate this housing development. Passage of numerous California legislative bills in 2017 and 2019 have eliminated many of the local impediments to the construction of ADU’s and all Urban County jurisdictions are working update their ordinance to comply with the State’s new ADU laws. In the interim state law prevails.

Shortage of Affordable Housing Funding: The availability of funding for affordable housing has dropped dramatically in the past decade for all jurisdictions in California that do not have local public or private housing funds. Dissolution of redevelopment agencies in the State of California in 2012, including the Modesto Redevelopment Agency, resulted in a significant drop in funding for housing projects.

Competition for tax credits and other State funding with cities in California and diminished amounts of HUD funding create a shortage of affordable housing.

Natural Disaster Response: Wildfires have occurred more frequently in California in recent years including the Camp Fire in 2018 and the Kincaid fire in 2019.

Public agencies handling response planning must coordinate with additional public and private agencies to respond to and rebuild fire-damaged areas. This process can be slow and delay both displaced residents from returning to their homes as well as local rental supply and price due to the temporary increase in renters.

Environmental Protection: California laws California Environmental Quality Act (CEQA) and the California Endangered Species Act (CESA) plus United States laws National Environmental Policy Act (NEPA) and Federal Endangered Species Act (ESA) regulations require environmental review of most every discretionary projects proposed to be conducted or approved by a California public agency, including private projects requiring government approval. Environmental review costs increase the total cost of housing development, infrastructure, and planning projects.

Planning and Development Fees:

Development fees also contribute to the cost of housing. Part of the cost associated with developing residential units is related to the fees to obtain project approval consistent with State law. Lengthy review periods can increase financial and carrying costs, which in turn can increase project-related expenses that are passed along to project occupants in the form of higher purchase prices or rents or make the affordable housing development cost-prohibitive.

Stanislaus County requires an application fee of \$4,056 or higher depending on processing time for a General Plan amendment and \$4,156 for a zone change. Stanislaus County's application fees are based on a full recovery of costs associated with the processing of land use applications.

According to the City of Turlock 2007–2014 Housing Element, a brief survey shows that the City of Turlock charges above-average planning application fees when compared to its neighboring jurisdictions. For example, the City of Turlock requires a deposit of \$8,275 for a General Plan amendment, while Stanislaus County (\$4,156), Ceres (\$2,000), and Patterson (\$2,760) fees are all less.

In the City of Turlock, the average cost for a 20-lot subdivision would be between \$5,070 and \$7,230, while in Patterson (\$3,390), Ceres (\$1,020), and Stanislaus County (\$4,170), the total cost is several thousand dollars less. The City of Turlock's fees are also designed to recover all costs for all City departments.

Fees, land dedications, or improvements also required in most instances to provide infrastructure (streets, sewers, and storm drains) that support new residential development and public parkland, increasing overall development cost.

There are numerous fire and school districts within Stanislaus County, and all charge impact fees. School fees range from \$2.60 to \$5.16 per square foot with an average of \$3.88 per square foot and can add to the cost of development, but are consistent with the amounts and parameters established by California Government Code Sections 65995 and 66000 et seq. Fire fees range from \$0.24 to \$0.60 per square foot with an average of \$0.42 per square foot.

Municipal Processing Time:

The processing time required to obtain approval of development permits is often cited as a contributing factor to the high cost of housing. Unnecessary delays add to the cost of construction by increasing land holding costs and interest payments.

Prevailing Wages: Davis-Bacon prevailing wage must be paid to laborers when federal Community Development Block Grant (CDBG) dollars are used to pay for any construction project over \$2,000 or on any multifamily housing project over eight units. Prevailing wage must also be paid on any HOME-funded multifamily housing project that directly funds twelve or more units. While competitive wages

are currently high, Davis-Bacon wages may be higher and add additional cost to housing construction and rehabilitation activities.

California's Prevailing Wage Law requires contractors to pay minimum wage rates on public works projects that support housing construction such as roads, water and sewer projects, and other public utilities. The rates are set by the California Department of Industrial Relations. These additional costs could add to local costs for housing development.

Expiration of Affordability Contracts: Affordability contracts with private property owners have a time limit that runs out after a contractually-set number of years. Unless the affordability contracts are renewed with the property owner, the affordable rental housing units will expire and become market-rate housing.

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

Potential constraints to housing development in Turlock vary by area, but generally include infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. Barriers to housing also include personal barriers such as poor credit history, involvement with the law, limited knowledge about tenants' rights and the complaints process.

Actions, planned and ongoing, by the City of Turlock to remove or ameliorate barriers to housing, consist of the following:

Development Process: To expedite project facilitation and provide internal support to project applicants, the City of Turlock will continue to undertake efforts to build relationships between the City and the development community to provide input into delivery of development services, cost of services, construction standards, development impact fees, and other development service policy areas.

Fee Structure: The City of Turlock will continue to review its fee systems as a means of reducing the cost of housing development. The City recognizes that fees can affect the cost of construction and of affordable housing in the community.

Subdivision Improvement Standards and Zoning Ordinance: The City will review and provide input to modify Subdivision Improvement Standards, where reasonable and appropriate, to provide cost savings in the development of residential units while continuing to ensure the public health, safety, and welfare of residents.

Rental Housing: The City will analyze implementation of incentive and financing programs such as a

Mortgage Revenue Bond Program, Federal Low-Income Housing Tax Credits, or other program for both owner-occupied and rental properties.

Land Costs, Construction, and Financing: Land, construction, and financing costs represent a significant constraint to residential development; developers of affordable housing face challenges in securing financing. Due to the limited possible return from rents or sales prices of affordable units, many private lenders are concerned with the financial returns for these types of projects; as a result, additional financing and subsidy from State and Federal funding sources for affordable projects are necessary. The City will pursue, where appropriate, State and Federal funding and/or subsidies to address land and construction costs.

AP-85 Other Actions

Introduction

The Stanislaus Urban County and the City of Turlock, through the Consolidated Consortium Plan, targets Federal funds to residents who have traditionally not been served, or are underserved by programs. Project activities funded through the Consolidated Plan are carefully designed to provide appropriate and needed services, particularly to those who may not be eligible for assistance from other sources, or are geographically isolated by lack of transportation, or lack basic amenities, particularly medical care, in their neighborhoods.

Actions planned to address obstacles to meeting underserved needs

One of the ongoing challenges in meeting the needs of the underserved is the lack of sufficient funding for services provided by local governments, non-profit organizations, and other agencies. Service providers faced with this challenge are expected to provide more and more services with the same, if not smaller, budgets every year. The Stanislaus Urban County and the City of Turlock will continue to seek funding opportunities through different sources, encourage projects or programs that leverage funds, and ensure that projects and programs are operated as effectively and efficiently as possible.

The Stanislaus Urban County and the City of Turlock will continue being an involved stakeholder in the CoC and the newly formed Stanislaus Homeless Alliance (SHA). These organizations both function to bring stakeholders and residents together to identify needs, service gaps, and potential solutions and partnerships to address housing and homelessness needs within the region.

The Housing Authority supports low- and moderate-income families throughout the region, and also play a key role in overcoming obstacles in meeting needs. Through working closely with the Housing Authority, Stanislaus Urban County and the City of Turlock, will continue to support the Housing Authority in their efforts to first identify needs and further meet those needs.

Actions planned to foster and maintain affordable housing

As stated throughout the Con Plan and AAP, affordable housing is considered a high priority.

Accordingly, the use of the HOME funding is prioritized for the development and rehabilitation of affordable housing that serves low-income households. Affordable housing strategies include both development of new affordable housing units as well as the preservation/conservation of existing affordable housing units.

Turlock and its nonprofit partner EAH, Inc. proposes to develop Avena Bella Phase II, an affordable housing rental project. The City proposes to utilize layered financing which includes LIHTC financing, \$1 million of Affordable Housing Sustainable Communities (AHSC) funds, \$900,000 of Affordable Housing Program (AHP) Funds and \$5 million of former Redevelopment Agency Housing Set Aside funds. Other funds, such as HOME funds may be used as needed to make the project competitive.

The Stanislaus Urban County relies on private non-profit organizations and for-profit developers to acquire, develop, or rehabilitate affordable units. The Stanislaus Urban County will continue to work closely with these entities to ensure that each year as many new affordable units are produced, or rehabilitated, as possible.

Actions planned to reduce lead-based paint hazards

The Housing Authority serves as the lead agency for the City of Turlock and Stanislaus Urban County in the identification, documentation, and prevention of lead poisoning. The Childhood Lead Poisoning Prevention Program of Stanislaus County, administered through the Housing Authority, becomes involved with childhood lead-based poisoning when notification of an elevated screening blood level is received either from the laboratory or physician. If the blood level is 10ug/dL (micrograms per deciliter), notification is made to the family. Once a child meets the case definition, an environmental investigation is performed by a Registered Environmental Health Specialist to determine, if possible, the source of lead exposure. The Housing Authority, in partnership with the Department of Environmental Resources, conducts the investigation of residences where children with elevated levels of lead reside.

Stanislaus Urban County and the City of Turlock partner with the Childhood Lead Poisoning Prevention Program to distribute information in the City and unincorporated areas of Stanislaus County and through members of the HOME Consortium. If the source of lead exposure is related to the residential physical environment (e.g., peeling paint that indicates the presence of lead), then the Housing Rehabilitation Program may participate in source eradication.

The Housing Authority actively addresses the issue of lead-based paint hazards by providing notices to landlords and tenants who participate in the Housing Choice Voucher Program, warning them of the hazards of lead-based paint. The City of Turlock and HOME Consortium Owner Occupied Housing Rehabilitation Loan Program and homebuyers who use HOME and CDBG fund are provided the notices by the member jurisdictions. Additionally, all units that are rehabilitated with CDBG and HOME funds are subject to lead-based paint compliance requirements.

Actions planned to reduce the number of poverty-level families

The Turlock HOME Consortium, and Stanislaus Urban County work to reduce poverty through ensuring an adequate, affordable, quality housing supply, improving low-income neighborhoods, strengthening the employment skills of the community and ensuring access to basic needs such as food and shelter. The City of Turlock is particularly focused on ensuring quality housing options to low-income individuals through the production of new low-income units as well as the rehabilitation of existing low-income units and combating rental discrimination against minorities.

The City of Turlock and the Stanislaus Urban County updated the Analysis to Impediments to Fair Housing Choice (AI) alongside the development of this Consolidated Plan and outlined ways in which each jurisdiction can take actions to ensure protected classes have equitable access to quality schools and employers. The AI investigates zoning codes, permit processes, and fees to ensure the County and each City within are as accommodating as possible to those developments and employers that will contribute to reducing poverty and increasing economic opportunity and housing stability.

The City of Turlock realizes that it cannot combat poverty alone, and it is a top priority of the City of Turlock to coordinate with other entities when possible. The City of Turlock is particularly committed to coordinating with Stanislaus County which manages many housing and social service programs. The City of Turlock also coordinates with other entities such as the CoC and various community-oriented nonprofit groups that have a stake in the community. It is a top goal of the City of Turlock to ensure that it accesses all available grant money to assist the community.

The CoC has developed into a more coordinated organization over the past five years, and the City of Turlock as well as the County will continue to leverage those partnerships and resources to address the issues of poverty.

The Stanislaus County Alliance WorkNet (Alliance), The Community Services Agency's CalWorks Program, and the California Employment Development Department are all resources available to persons seeking employment.

In addition, the City of Turlock, through its economic development efforts, strives to promote activities that will ultimately have major impacts on the community, such as job creation that in turn will reduce poverty. The Alliance partners with Stanislaus County, Turlock and the other cities in fulfilling the following objectives:

- Promotion of Stanislaus County and its nine incorporated cities as a desirable location for new and expanding businesses.
- To work with public agencies and local businesses to promote cooperation in the economic development process.
- To assist in business retention and expansion efforts by offering programs for technical and financial assistance.

In addition, the City of Turlock, through its economic development efforts, strives to promote activities

that will ultimately have major impacts on the community, such as job creation that in turn will reduce poverty.

The Alliance maintains a small revolving loan fund for gap financing. Typically, the Alliance will provide up to half the business financing needs while a bank provides the other half. The Alliance revolving loans are for terms of up to seven years and are at competitive interest rates.

Actions planned to develop institutional structure

The City of Turlock relies on the nonprofit service sector to provide emergency shelter, transitional and special needs housing, and services to the homeless population. The City of Turlock will fully continue to support these organizations and their activities.

The Continuum of Care (CoC) continues to work to improve services provided, including data collection quality through the HMIS system, to ensure that participants receiving services do not experience any gaps as they strive to reach their goals of independence from the need of public services in the community. To the extent that a gap exists in the institutional structure, a strategy of the Action Plan is to take action to close that gap.

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

The City of Turlock and HOME Consortium rely on private nonprofit organizations and for-profit developers to build and acquire, develop, and rehabilitate affordable units. The City and HOME Consortium will continue to work closely with these entities to ensure that each year as many new affordable units are produced, or are available, as possible.

The City of Turlock also relies on the nonprofit service sector to provide emergency shelter and transitional and special needs housing. The City will continue to support these organizations and their activities.

The City of Turlock, as administrator of the HOME Consortium, coordinates and consults with other program providers, local, State, and Federal government entities, nonprofit and for-profit organizations and business, professional organizations, interest groups, and other parties interested in the implementation of federal programs.

Specifically, they are: the Housing Authority; HUD; BHRS; HCD; Stanislaus County Health Services Agency; Stanislaus County Community Services Agency; U.S. Department of Agriculture/Rural Development; U.S. Economic Development Administration; California Coalition for Affordable Housing; Habitat for Humanity; Stanislaus County Affordable Housing Corporation; California Rural Legal Assistance; and Self-Help Enterprises. This will assure that the activities outlined in the Annual Action

Plan are given the fullest attention for design and implementation or construction.

The City of Turlock will continue to participate in regularly scheduled meetings with other jurisdictions and Stanislaus County to coordinate any CDBG-, HOME-, and ESG-funded activity that may be of benefit to each separate entitlement community in Stanislaus County. This will assure that the activities outlined in the Action Plan are given the fullest attention for design and implementation or construction.

The City of Turlock will maintain its membership and active involvement in the Continuum of Care (CoC) to continue outreach and information sharing with other Stanislaus County agencies serving similar clientele.

AP-90 Program Specific Requirements

Introduction

There are three specific goals of the Federal CDBG and HOME programs:

1. Provide decent housing.
2. Provide a suitable living environment.
3. Expand economic opportunities.

The Action Plan has been developed to assist in achieving these three goals. The overriding consideration required of the CDBG program is to benefit those members of the population that meet the definition of Targeted Income. A Targeted Income person is one who earns 80% or less of the AMI for CDBG funds. Additionally, if a project benefits a specific neighborhood or community, at least 51% of the population within that geographic boundary must be within the Targeted Income Group (TIG).

As identified by the Consolidated Plan for Fiscal Years 2020-2021, priority will be given to projects in the following areas: Infrastructure, Economic Development, Housing Assistance, Housing Programs, and Public Services.

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 150,000
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:	150,000

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 permit HOME funds to be invested as loans, grants, deferred payment loans, and other types of investment permitted by the regulations described in 92.205(b). The City will not permit other forms of investment without the prior approval of HUD.

The Consortium members generally use HOME funds for First Time Home Buyer, rehabilitation, and acquisition. For First Time Home Buyer and rehabilitation loans and grants eligible applicants will be at 80% of the AMI or below and will be provided funds on a first come first serve basis. Detailed information regarding the programs is provided on member's individual websites.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The HOME statute states that resale provisions must limit subsequent purchase of the property to income-eligible families, provide the owner with a fair return on investment, including any improvements, and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. The HOME statute also specifies that recapture provisions must recapture the HOME investment from available net proceeds in order to assist other HOME-eligible families. The City of Turlock elected to establish a recapture provision of its program. At no time does the City expect to use the resale provision as it was not requested or approved as required by HUD.

In cases where the net proceeds available at the time of sale are insufficient to recapture the entire direct HOME subsidy provided to the homebuyer, the HOME Consortium is not required to repay

the difference between the total direct HOME subsidy and the amount the HOME Consortium is able to recapture from available net proceeds. The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. In applying the option of the recapture provision, the following formula will be used:

HOME investment / (HOME investment + Home Owner investment) X Net proceeds = HOME amount to be repaid

Home Owner investment / (HOME investment + Home Owner investment) X Net proceeds = Amount to Home Owner

Affordable Homeownership Limits: HUD provides the HOME affordable homeownership limits (initial purchase price or after-rehabilitation value of homeownership units assisted with HOME funds not exceed 95 percent of the area median purchase price for single family housing. Under the Code of Federal Regulations at title 24, part 92, section 254, paragraph (a)(2)(iii) HUD allows jurisdictions to prepare a market analysis to determine this limit following HUD guidance.

The 95 percent of median area purchase price must be established in accordance with a market analysis that ensured that a sufficient number of recent housing sales are included in the survey. Sales must cover the requisite number of months based on volume. The address of the listed properties must include the location within the Consortia's jurisdiction. The housing sales data must reflect all, or nearly all, of the one-family house sales in the entire Consortia jurisdiction. After identifying the median sales price per HUD's guidance, the amount should be multiplied by 0.95 to determine the 95 percent of the median area purchase price. Final limits were rounded to the nearest thousand. Turlock will use the highest limit for the Consortia member as determined by HUD or the survey. The analysis limits for the Consortia members are: Ceres \$299,000, Hughson \$375,000, Newman \$347,000, Oakdale \$366,000, Patterson \$360,000, Riverbank \$318,000, Stanislaus County \$334,000, Turlock \$323,000, and Waterford \$285,000.

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:

In the case of affordability, the HOME Consortium recaptures the entire amount of the direct HOME subsidy provided to the homebuyer before the homebuyer receives a return. The HOME Consortium's recapture amount is limited to the net proceeds available from the sale.

Affordability for homeownership projects undertaken using the recapture provision will be ensured through the use of real estate lien notes and/or restrictive covenants outlining the City's recapture provisions. Homeownership projects undertaken using the resale provision shall use deed restrictions, covenants running with the land, or other similar mechanisms per 92.254(a)(5)(i)(A) to ensure the resale requirements are met. The period of affordability specified in the mortgage will be the minimum period for the project as specified above. The period of affordability is based on the

total amount of direct HOME funds invested in the housing project.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Turlock and the HOME Consortium do not intend to refinance any kind of existing debt with HOME funds.