

2022 Action Plan for Housing & Community Development

City of Burlington, Vermont



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This document is available upon request in alternative format for persons with disabilities.

Minor Amendment created on October 20th, 2022. Changes highlighted below.

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Public Notice

As of April 15th, 2022, the funding amounts shown in this Draft Action Plan are estimated amounts for both CDBG and HOME programs. Final allocations from HUD will be awarded on or around May 13, 2022 and the Draft Action Plan will be updated to reflect those funding amounts.

Any increase or decrease in funding from HUD relative to the estimated allocation amount described in this Draft Plan will be applied to the following activities:

CDBG/HOME Project 22-1 Affordable Housing

CDBG Project 22-4 Public Service, not to exceed the 15% total allocation cap

CDBG/HOME Admin: Project 22-5 Admin and Planning will be calculated at 20% of the final HUD allocation and program income

1st Amendment (Minor): October 20th, 2022 – Update to the City of Burlington’s 2022 Entitlement funding allocations for the CDBG programs.

Executive Summary

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

1. Introduction

The 2022 Action Plan explains how the City plans to spend the Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) funds that the City receives from the U.S. Department of Housing & Urban Development (HUD), together with other leveraged resources, during the upcoming program year beginning on July 1, 2022. The national CDBG program is a principal revenue source to grow local communities and improve the quality of lives for low- and moderate- income residents. The HOME program is designed to create affordable housing for low-income households through building, buying, and/or rehabilitating housing for rent or homeownership.

The overall goal of these community planning and development programs is to develop viable communities by providing decent housing, expanded economic opportunities, and a suitable living environment, principally for low- and moderate-income persons. HUD administers these programs on a national basis and awards grants to entitlement communities and participating jurisdictions – including the City of Burlington – each year on a formula basis. The City in turn

awards grants and loans to local nonprofits as well as providing direct services to residents and businesses through several CDBG-funded programs.

2. Summarize the objectives and outcomes identified in the Plan

Affordable housing continues to be the City's highest overall priority under this Consolidated Plan. Cost of housing, age of the housing stock and a low vacancy rate are three significant factors that contribute to the need for affordable housing in Burlington. The following initiatives are on the City's housing agenda during this 5-year Consolidated Plan: preserving as many affordable units as possible; creating new affordable units, renovating rental and owner-occupied affordable housing and promoting homeownership among income-qualified households. The City views investment of CDBG funds into activities that help residents to become and/or remain housed and living independently as an effective investment.

Economic opportunity is the City's next highest priority. As the state's largest city, Burlington must continue to be an economic engine for the region and state. The City uses CDBG to focus on job creation and retention through technical assistance for businesses, and to support low-income residents in business ownership through entrepreneurial training and loans. These effective and cost-efficient uses of CDBG resources create and retain businesses and jobs, leverage other resources, increase tax revenues to support City services, support local ownership, and revitalize neighborhoods.

The City has also historically used CDBG to address barriers to economic opportunity. Access to affordable, quality early child care is one example; this is an identified community priority and an activity with multiple long-term impacts including: the ability of parents to get and keep a job, children's success in school, reduction of public safety costs, and ultimately the quality of the local workforce. In addition, low income persons need assistance in filing tax returns and developing financial literacy. The City chooses to be flexible in its funding choices in this area in order to respond to shifting needs and resources, emerging opportunities and crises, and changing economic conditions.

A suitable living environment is the City's third priority overall. The City has a limited capacity to fund social services out of municipal resources, and has historically used the maximum (15%) available CDBG resources to support the provision of social services by local nonprofits. The City also uses CDBG to support public facilities and infrastructure, as well as nonprofit facilities, where there is support for the project and no other resources.

3. Evaluation of past performance

The City continues to focus its CDBG and HOME dollars on high priority activities, primarily comprised of housing, economic development, and suitable living environment projects. In addition to focusing funds across the three identified priorities, the City also targets its funding geographically in high priority areas such as the Neighborhood Revitalization Strategy Area (NRSA). Burlington continues to focus essentially all expenditures to assist low and moderate-income persons, as a result greater than 99% of CDBG beneficiaries fall in the low to moderate income category.

Below are the City's most recent highlights of past performance that contributed to the selection and focus of this year's goals and projects.

Highlights of Outcomes

The City's highest priority under its Consolidated Plan is affordable housing. Highlights include:

- The Burlington Lead Program completed the final year of its three-year grant Lead Based Paint Hazard Control. The program completed testing for Lead-Based Paint hazards in 10 Housing units, performed Lead Hazard Control (LHC) on 12 housing units, performed Healthy Home Interventions in 12 housing units, trained 15 individuals on the VT Essential Maintenance Practices Lead Law (EMP) and conducted 1 Outreach and Education events that reached 40 individuals. Nearly \$446,392.78 was allocated for these activities including the LHC project and administrative costs, and Healthy Homes funding.
- Construction was ongoing for three HOME funded affordable housing projects.
- Pathways Vermont served 36 individuals experiencing homelessness by providing a variety of housing support services including service coordination, housing location services, retention supports, benefits coordination, and mental health and substance use services.
- Through CDBG-funded partners, 12 renters achieved the goal of homeownership
- Rehabilitation of 4 owner-occupied units was completed enabling low income households to stay in their homes.

Economic opportunity is the City's next overall priority. Highlights include:

- CEDO and CDBG funded partners provided technical assistance to 165 micro-enterprises

- CEDO provided business assistance grants to 34 businesses to retain jobs, support low- and moderate-income business owners, and foster vibrant neighborhood economies
- In order meet the needs of working families, early childhood services were provided at three sites. The ECHO Early Learning Center site served 96 persons, while the Lund Early Childhood Program served 39, and the Sara Holbrook Center Elementary After School Program served 63.
- The Volunteer Income Tax Assistance (VITA) program served 733 Burlington residents, providing tax preparation and other income tax related assistance.
- CEDO provided job training assistance to 5 low to moderate income individuals. CDBG-funded partner, ReSource of Burlington provided job training assistance for 7 low-income Burlington residents.

A suitable living environment is the City’s third priority. Highlights include:

- CDBG-funded agency Steps, provided emergency shelter and services to over 454 homeless residents
- Development work, including site work and construction, continued at the Moran FRAME project
- Construction was completed to rehabilitate the O.N.E. Community Center and the site was able to serve 35,530 residents.

4. Summary of Citizen Participation Process and consultation process

The Community & Economic Development Office is the lead agency responsible for overseeing the development of the Action Plan and for administering the CDBG and HOME programs. The Citizen Participation Plan was followed for the development of this Plan. A Public hearing was held on May 9th 2022 at a City Council meeting. The hearing was published in a local paper. Organizations were consulted, including the Continuum of Care.

The most meaningful way in which Burlington residents participate in the Action Plan process is their involvement in the nuts and bolts of spending decisions. Each of the City’s eight wards (Neighborhood Planning Assemblies) elects a representative to the CDBG Advisory Board; and collectively, those residents have a majority voice in making recommendations to the Mayor about how to spend the City’s CDBG funding each year. The NPAs are grassroots associations, created by City Charter, which exist in each of the City’s wards and which meet monthly as organized, democratic forums where neighbors can learn about public issues that affect them

and advise city government of their concerns and needs. The Board's recommendations have traditionally been adopted without change by the Mayor and City Council.

The City engaged in alternative public involvement techniques during the development of this Plan. The Plan was posted on the City's website and citizens were invited to comment via social media and email lists.

The public comment period will begin on April 15th, 2022 and end on May 15th, 2022.

5. Summary of public comments

The City did not receive public comments on the 2022 Action Plan.

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

The City did not receive public comments on the 2022 Action Plan.

7. Summary

To summarize, the following document represents the housing, community and economic development needs and priorities as well as the chosen projects and activities to implement for the City of Burlington's 2022 Action Plan.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	Burlington, VT	Community & Economic Development Office
HOME Administrator	Burlington, VT	Community & Economic Development Office

Table 1 – Responsible Agencies

Narrative (optional)

The Community & Economic Development Office (CEDO) is a department of the City of Burlington. The department engages our community to build an equitable, healthy, safe, and vibrant city with opportunities for all. CEDO staff members and programs seek to foster economic vitality; preserve and enhance neighborhoods, quality of life, and the environment; and promote equity and opportunity for all residents of Burlington. In support of its mission, CEDO works in partnership with citizens, the public and private sector, and other City departments to: strengthen the quality of life in Burlington's neighborhoods; preserve and develop decent, safe and affordable housing opportunities; maintain and improve the vitality of Downtown, the Pine Street area and neighborhood business districts; encourage a thriving business sector; foster job growth and employment opportunities; increase civic engagement and citizen participation; support the delivery of human services; and revitalize Burlington's waterfront.

CEDO is funded through various grant and municipal sources, including Federal and State grants, the Housing Trust Fund and a portion of General Fund dollars. CEDO divisions include: Grants and Finance, Community Works, Initiative to End Homelessness, Opportunities and Engagement, and the Community Justice Center. In addition, CEDO has administrative/fiscal staff.

Consolidated Plan Public Contact Information

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

1. Introduction

Since 1983, the City has dedicated much of its housing and community development resources to supporting a network of nonprofit organizations to act as partners in producing & preserving affordable housing and protecting the City's most vulnerable residents. This nonprofit infrastructure functions as the principal housing & social services delivery system to help the City move towards its housing goals and alleviating poverty.

Collaboration begins with a focus on assembling the right people or agencies at the table, clearly defining roles and responsibilities, sharing a common mission and developing good communication. This basic collective impact model has been effective for current collaborations.

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

The City of Burlington consults with numerous organizations in the development of the 5 Year Consolidated Plan, the Assessment of Fair Housing, and the Action Plan. The process includes formal and informal meetings, surveys, discussions and focus groups. The process of developing the Assessment of Fair Housing began in 2017 with a housing and neighborhood survey; the City received over 700 responses. The City also met with over 23 agencies, all of the Neighborhood Planning Assemblies, service beneficiaries, and residents in Burlington Housing Authority units. Over 2,400 postcards, in 3 different languages, were mailed to all residents of Burlington Housing Authority. This extensive outreach informed the strategic goals of both the Assessment of Fair Housing and the current 5-year Con Plan (2018-2023). It continued with a Public Hearing in September 2021 to hear community views on housing and community development needs, as well as comment on prior program year performance.

Between Dec. 2016 and July 2017, CEDO consulted with a number of groups, organizations and citizens, sharing or asking for data & for input on needs, priorities and other issues. Those groups & organizations included representatives of public and private agencies who serve children, seniors and people with disabilities, people living with HIV/AIDS, homeless and low-income residents. In addition, multiple housing agencies, health/mental health service agencies, regional & state government were consulted. In addition, a strong collaboration with United Way was developed regarding the application process.

The Chittenden County Homeless Alliance continues to develop a common agenda and embrace several best practices including using a common assessment tool for permanent supportive housing, prioritizing those units for the most vulnerable, implementing a community wait list and using a shared information management system with the Balance of State.

The Opioid Alliance represents a coordinated effort to include the Burlington Police Department, United Way of Northwest Vermont, Agency of Human Services, UVM Medical Center, Howard Center, the City and Dept. of Health along with other agencies. This collaboration relies on a collective impact approach, sharing data and coordinating between agencies.

Collaboration between the City and Burlington's non-profit and government partners, already robust, expanded significantly in response to the COVID-19 pandemic and that collaboration continues into 2022. The City set up the Resource and Recovery Center (RRC) which continues to collect community resources to help Burlington citizens and businesses through these uncertain times. The RRC provides referrals and direct assistance to Burlington residents on unemployment insurance claims, food security, small business, housing, property tax assistance and with access to many other essential services. Burlington's Homeless providers continue to meet weekly with stakeholders including Champlain Housing Trust, Agency of Human Services, CHCB, Howard, Steps, Spectrum, and Veterans organizations to coordinate housing and supports for homeless in other low-income residents. The City established a Senior Providers Pandemic Response Working Group, meeting weekly to provide information resources, pandemic updates, access to information on PPE supplies, testing and later, vaccination. The group provides a space for peer learning and support at a time of real emergency and stress for providers of services to seniors. The meeting simultaneously gave access to leadership at both City and State levels on all aspects of COVID response.

Members of the City government (multiple departments) and representatives of the University of Vermont, Champlain College, and University of Vermont Medical Center routinely meet with constituents, nonprofit representatives and land owners to address shared housing and community development challenges.

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

Chittenden County Homeless Alliance consists of a consortium of nonprofit organizations, local businesses, and local/state/federal agencies in the greater Burlington metropolitan area, with the City of Burlington's Community & Economic Development Office (CEDO) serving as the Collaborative Applicant. The Alliance meets quarterly with the Steering Committee meeting monthly. The Alliance coordinates services for families, youth and single adults who are homeless; coordination between the agencies is enhanced with member participation on both the steering committee and sub-committee levels.

The CoC coordinates the implementation of a housing and service system from outreach to housing to services that meet the needs of homeless individuals and families. Street outreach, Vermont 211, daytime shelter and meals all serve to reach the homeless and identify services/needs, including housing placement. Housing providers work to rapidly re-house or provide housing as quickly as possible & stabilize, while supportive service agencies provide case management and connect with additional services. Providers serve the chronically homeless, families with children, veterans, unaccompanied youth & those at risk of homelessness.

Member agencies work together to meet the needs of chronically homeless, and recent efforts include an improved system of outreach, prioritization of resources, coordinated entry along with increased permanent supportive housing options for chronic homeless & support services. An emphasis includes housing retention (with services and case management) due to a low vacancy rate in this jurisdiction. Agencies work with local landlords to reduce the barriers of renting to chronically homeless.

The CoC providers work to identify, move into stable housing, & provide essential services for households with children who are homeless. Each CoC program that serves children has children's advocates or specially trained staff to ensure that the children's need for safety, nurturing, education, and stability are met.

The CoC partners with local, state, and federal organizations to combat homelessness among veterans. Outreach has increased to local veterans at the local shelters. Previously un-identified veterans were enrolled in VA care & many are now housed through VA housing programs.

A continuum partner provides emergency services to youth ages 16-22 who have run away, are homeless, or at risk of homelessness. Supported housing includes emergency shelter and transitional housing for youth who have left foster care and are homeless. Youth are provided with individual/family counseling, mental health/substance abuse assessment and treatment, case management, medical services, educational planning, employment support, life skills, jobs training, and mentoring. Another local program provides job and life skills training to at-risk youth while helping them complete their high school education.

CDBG funds have been targeted to address emerging needs identified through the CoC. Public Service funds were used to fund housing navigation for permanent supportive housing programs.

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

ESG funding allocations are made by the State of Vermont. Several state offices, including the Office of Economic Opportunity which administers ESG participate actively in the CoC and its numerous committees, including strategic planning and coordinated entry. VT's Emergency Solutions Grant funds are blended with state funds and administered under the Housing Opportunity Grant Program. Funding decisions are based on thorough knowledge of this Continuum's operations and priorities, with an emphasis on how best to realize value for investment. The State solicits specific feedback from the CoCs and stakeholders through presentations, discussions, and surveys regarding priorities and how to allocate ESG funds to eligible activities as well provide an annual review of funding priorities and performance.

The Chittenden Homeless Alliance has developed a single HMIS with the Vermont Balance of State including joint governance, policies and procedures. One of our CoC-funded projects supports the HMIS lead of the Institute of Community Alliances. The Alliance is working to expand the number of agencies using HMIS, coordinated entry and a community wait list. The Alliance members use ServicePoint HMIS and the CoC will utilize reports and information for strategic planning.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CHAMPLAIN VALLEY OFFICE OF ECONOMIC OPPORTUNITY
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services-Education Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Anti-poverty Strategy Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This Agency was consulted on needs, progress, and upcoming goals.
2	Agency/Group/Organization	COMMITTEE ON TEMPORARY SHELTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted on needs, progress, and upcoming goals.
3	Agency/Group/Organization	CHAMPLAIN HOUSING TRUST

	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted on needs, progress, and upcoming goals.
4	Agency/Group/Organization	Vermont Agency of Human Services
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Homelessness Strategy coordination of funds and services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was involved in the review of potential CDBG projects and consulted on upcoming goals and strategies.
5	Agency/Group/Organization	Continuum of Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Members of the Continuum were consulted to update homeless progress, strategies, and goals. They were also consulted to review and comment on the Plan.

6	Agency/Group/Organization	BURLINGTON HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted for the needs assessment, market analysis, and status of public housing programs.

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

There were no agencies not consulted in our process.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	CEDO	The goals to prevent homelessness, rapidly re-house the homeless, provide for basic needs, increase permanent housing overlap with our Strategic Plan goals to preserve affordable housing units, increase permanent supportive housing beds, protect the vulnerable through public services to the homeless and anti-poverty strategies.
planBTV	City of Burlington- Planning Department	The goals of economic development and increasing housing options overlap with planBTV's goals and recommendations for the City of Burlington and the downtown/waterfront areas.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
ECOS	Chittenden Regional Planning Commission	There is a coordination with regional transportation and CEDS (Comprehensive Economic Development Strategy) for the City and then the County as a whole.
Housing Action Plan	CEDO	The goals of the Housing Action Plan are incorporated in the strategic plans for affordable housing and addressing the barriers to housing across the economic spectrum.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Continuum partners include agencies representing health which include the University of Vermont Medical Center and Community Health Centers of Burlington; agencies representing mental health and youth facilities (Howard Center and Spectrum); economic services, temporary assistance and food stamps (AHS – Economic Services). Other divisions within City Government include victim services, lead program, and housing services. Additionally, the private sector enhances the City's community development and housing efforts. Architects, engineers and attorneys assist nonprofit developers by providing skills and services to implement housing projects. Burlington's banks have responded to a changing market and changing obligations under the federal Community Reinvestment Act by finding a number of innovative ways of support new housing models, housing organizations, and approaches to affordable housing production. Local lenders also support neighborhood revitalization and small business development, financial education, and free tax preparation services for low-income taxpayers. The Burlington business community has been actively represented on most community advisory committees. They have provided resources and opportunities for residents to improve their quality of life.

AP-12 Participation – 91.105, 91.200(c)

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

A public hearing was held in September 2021 to review the achievements published in the Consolidated Annual Performance and Evaluation Report (CAPER) and also hear any citizen input on housing and community development needs for the City. A notice about the availability of funds was published online and in Seven Days in the beginning of December of 2021 and a direct email notice provided to over 100 nonprofits, City departments and residents about the funding. An informational workshop was held for applicants. All applications are published online on the City of Burlington's website. The CDBG Advisory Board held three meetings in February 2022 – March 2022 to review all applications; the Board is comprised of representatives from the local Neighborhood Planning Assemblies, Mayoral selections, representatives of state agencies and local grant making agencies. These citizens make the recommendations on how to spend CDBG funds locally, and these recommendations are conveyed to the Mayor and City Council. These recommendations are the foundation for the Action Plan. The recommendations of the Advisory Board are published online along with the draft Action Plan. An advertised public hearing was held on May 9th, 2022 on housing and community development needs in the City, the Advisory Board recommendations, and the draft 2022 Action Plan. The Plan was available for public comment for 30 days with outreach on social media (Facebook and Twitter) and the City of Burlington's website. These numerous efforts were made to broaden citizen participation in the City.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	In September 2021, the City held a Public Hearing before the CDNR committee (a sub-committee of City Council) in regards to the use of CDBG funds and the accomplishments. Committee members, City Staff and members of the public were present.	One written comment received regarding the negative impact that college students have on rental and owner-occupied units in Burlington.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	Notice of funding availability for the 2022 CDBG Action Plan was advertised on December 1, 2021 in the Seven Days paper to the general public.			
3	Public Meeting	Nonprofits & potential sub-grantees	One workshop was held for potential sub-grantees on December 15, 2021 to offer technical assistance. Approximately 10 people attended from a variety of nonprofits.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community	The applications for CDBG funding were placed on the CEDO/City of Burlington website. The applications remain available for view online.			https://www.burlingtonvt.gov/CEDO
5	Newspaper Ad	Non-targeted/broad community	An ad was placed in Seven Days newspaper on April 13 th , 2022 as a legal notice for the public hearing on May 9 th , 2022 for the public comment period for the 2022 Action Plan.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
6	Internet Outreach	Non-targeted/broad community	The 2022 Action Plan was published online on the CEDO/City of Burlington website during the public comment period. Over 100 individuals and nonprofits, in addition to the CoC, received an email link to the Plan.			https://www.burlingtonvt.gov/CEDO

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
7	Public Hearing	Non-targeted/broad community	A public hearing was held on May 9 th , 2022. Attendance included members of the City Council and City Staff as well as members of the public.	The City did not receive public comments on the 2022 Action Plan.	The City did not receive public comments on the 2022 Action Plan.	http://go.boarddocs.com/vt/burlingtonvt/Board.nsf/goto?open&id=CE4NPF60D98E

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

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	\$733,713	\$30,000	\$640,000	\$1,403,713	\$0	The City expects to leverage significant federal, state, local and private resources over the course of the Consolidated Plan.

HOME	Public-federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$460,912	\$0	\$425,691	\$886,603	\$0	The City expects to leverage significant federal, state, local and private resources over the course of the Consolidated Plan.
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Table 5 - Expected Resources – Priority Table

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

The City anticipates \$23 million in housing resources for Section 8 and Housing Choice Vouchers, and approximately \$1.2 million (\$6 million over 5 years) in McKinney-Vento Homeless Assistance Act will be available to address needs and objectives identified in the Plan. The City has also committed \$3 million in ARPA funds for housing activities. While these are not resources that the City receives or controls, they provide a critical contribution to reaching the City’s Action Plan goals. Furthermore, the City is implementing a \$3.6 million Healthy Homes Lead Grant covering the period of January 2021 through July 2024.

Overall, the City expects to leverage over \$30 million in state, local, private and other federal resources for its CDBG- and HOME-funded activities. These are funds that the City and its subgrantees expect to raise for their budgeted activities as well as funds that the City expects outside entities to invest in development activities.

The City will meet or exceed the requirement that “contributions must total not less than 25% of funds drawn from the jurisdiction’s HOME Investment Trust Fund Treasury account in that fiscal year,” excluding funds drawn for administrative and planning costs pursuant to 24 CFR 92.207. Sources of matching funds include, but are not limited to, the Vermont Housing & Conservation Trust

Fund, the Burlington Housing Trust Fund, waiver of impact fees, and private debt financing secured by property owners and nonprofit organizations.

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

There is no City owned land or property that is appropriate to be used to address the needs identified in the Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	DH 1.1 Protect the Vulnerable - New Perm Supp Hous	2018	2023	Affordable Housing Homeless	City-Wide	AFH - Increase Affordable Housing Opportunities	CDBG: \$0 HOME: \$0	Housing for Homeless added: 0 Household Housing Unit
2	DH1.2 Protect the Vulnerable New Special Need Hsng	2018	2023	Affordable Housing Non-Homeless Special Needs	City-Wide	AFH - Increase Affordable Housing Opportunities	CDBG: \$0 HOME: \$0	Rental units constructed: 0 Household Housing Unit
3	DH 2.1 Acquire/Rehab - Rental or Owner Units	2018	2023	Affordable Housing	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	AFH - Maintain or Preserve Affordable Housing	CDBG: \$167,883 HOME: \$0	Homeowner Housing Rehabilitated: 6 Household Housing Unit
4	DH 1.3 Create New Affordable Housing	2018	2023	Affordable Housing	City-Wide	AFH - Increase Affordable Housing Opportunities	CDBG: \$232,960 HOME: \$840,512	Rental units constructed: 8 Household Housing Unit Rental units rehabilitated: 108
5	DH 1.4 Promote new homeownership buyer assist	2018	2023	Affordable Housing	City-Wide	AFH -Housing Resources to LMI residents, homeowner	CDBG: \$0 HOME: \$0	Direct Financial Assistance to Homebuyers: 0 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	DH 2.2 Protect the Vulnerable - Lead Hazard	2018	2023	Affordable Housing	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	AFH - Maintain or Preserve Affordable Housing AFH -Housing Resources to LMI residents, homeowner	CDBG: \$0 HOME: \$0	Rental units rehabilitated: 0 Household Housing Unit Homeowner Housing Rehabilitated: 0 Household Housing Unit
7	DH 3.1 Protect the Vulnerable Hsng Retention Svcs	2018	2023	Affordable Housing Homeless Non-Homeless Special Needs	City-Wide	AFH - Maintain or Preserve Affordable Housing AFH -Housing Resources to LMI residents, homeowner	CDBG: \$0 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted
8	EO 1.1 Support Microenterprises	2018	2023	Non-Housing Community Development	City-Wide	AFH - Increase Employment/Economic Opportunities	CDBG: \$222,000 HOME: \$0	Businesses assisted: 173 Businesses Assisted
9	EO 1.2 Retain/Create Jobs	2018	2023	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	AFH - Increase Employment/Economic Opportunities	CDBG: \$0 HOME: \$0	Jobs created/retained: 0 Jobs
10	EO 1.3 Reduce Economic Barriers - Early Childhood	2018	2023	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	Reduce Barriers to Economic Opportunities	CDBG: \$55,127 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 105 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	EO 1.4 Reduce Economic Barriers - Access Resources	2018	2023	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA	Reduce Barriers to Economic Opportunities	CDBG: \$45,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 606 Persons Assisted
12	SL 1.1 Provide Public Services Homeless	2018	2023	Homeless	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	AFH -Housing Resources to LMI residents, homeowner Provide Public Services to At Risk Population Protect the Vulnerable	CDBG: \$0 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 0 Households Assisted Homeless Person Overnight Shelter: 0 Persons Assisted
13	SL 1.2 Provide Public Services	2018	2023	Non-Housing Community Development	City-Wide	Provide Public Services to At Risk Population Protect the Vulnerable	CDBG: \$0 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
14	SL 1.3 Improve Public Facilities & Infrastructure	2018	2023	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	Improve Public Facilities or Infrastructure	CDBG: \$528,000 HOME: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 35,530 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
15	SL 1.4 Remediation of Brownfields	2018	2023	Affordable Housing Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide	Clean-up of Contaminated Sites	CDBG: \$0 HOME: \$0	Brownfield acres remediated: 0 Acre
16	Planning and Administration	2018	2023	Planning, Administration, Fair Housing		Planning and Administration	CDBG: \$152,743 HOME: \$46,091	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	DH 1.1 Protect the Vulnerable - New Perm Supp Hous
	Goal Description	During this Action Plan, no new awards were made.
2	Goal Name	DH1.2 Protect the Vulnerable New Special Need Hsng
	Goal Description	During this Action Plan, no new awards were made.
3	Goal Name	DH 2.1 Acquire/Rehab - Rental or Owner Units
	Goal Description	During this Action Plan CDBG funds will be used for CHT's Housing Improvement Program (HIP) assisting 6 homeowners.

4	Goal Name	DH 1.3 Create New Affordable Housing
	Goal Description	During this Action Plan Cathedral Square will facilitate the rehabilitation of 108 housing units using CDBG funds. HOME funds will be used for the rehabilitation and/or construction of 8 new affordable housing units.
5	Goal Name	DH 1.4 Promote new homeownership buyer assist
	Goal Description	During this Action Plan, no new awards were made.
6	Goal Name	DH 2.2 Protect the Vulnerable - Lead Hazard
	Goal Description	Although no CDBG funds will be allocated during this Action Plan, 58 homeowner and rental units will receive lead hazard reduction services through the 2021 Lead-Based Paint Hazard Control grant.
7	Goal Name	DH 3.1 Protect the Vulnerable Hsng Retention Svcs
	Goal Description	During this Action Plan, no new awards were made.
8	Goal Name	EO 1.1 Support Microenterprises
	Goal Description	During this Action Plan the City will allocate CDBG funds to two microenterprise programs, CVOEO-Financial Futures: Micro Business Development and Mercy Connections-Small Business Equity Program, with a focus on women, and other micro businesses. The City of Burlington will also deliver grants and technical assistance to micro enterprises.
9	Goal Name	EO 1.2 Retain/Create Jobs
	Goal Description	During this Action Plan, no new awards were made.
10	Goal Name	EO 1.3 Reduce Economic Barriers - Early Childhood
	Goal Description	During this Action Plan the City will allocate CDBG funds to two Early Childhood programs, ECHO-Early Learning and Lund-Early Childhood Education Program with a focus on supporting vulnerable children and families.

11	Goal Name	EO 1.4 Reduce Economic Barriers - Access Resources
	Goal Description	During this Action Plan CDBG funds have been allocated to a workforce development program, ReSOURCE-YouthBuild and CVOEO-Volunteer Income Tax Assistance program to reduce barriers to economic resources and opportunities.
12	Goal Name	SL 1.1 Provide Public Services Homeless
	Goal Description	2022 Public Service projects were allocated through the Amended 2019 Action Plan.
13	Goal Name	SL 1.2 Provide Public Services
	Goal Description	2022 Public Service projects were allocated through the Amended 2019 Action Plan.
14	Goal Name	SL 1.3 Improve Public Facilities & Infrastructure
	Goal Description	During this Action Plan CDBG funds have been allocated to improve the Moran infrastructure including improvements at Burlington’s waterfront public access spaces and to redevelop the VFW center to better serve low-income Burlington veterans.
15	Goal Name	SL 1.4 Remediation of Brownfields
	Goal Description	During this Action Plan, no new awards were made.
16	Goal Name	Planning and Administration
	Goal Description	To support the capacity of the nonprofit institutional delivery structure in the City; pursue state and federal resources in support of City initiatives; implement City planning efforts; administer community and economic development programs; and support fair housing efforts in the City.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

It is estimated that at initial occupancy approximately 16 persons shall receive affordable housing through 8 HOME-assisted and HOME-ARP assisted units as a result of the 2022 HOME and HOME-ARP allocation to the City of Burlington. However, it is important to note that these funds will continue to benefit many new households during the HOME Affordability Period and the HOME-ARP Compliance Period.

Projects

AP-35 Projects – 91.220(d)

Introduction

This part of the Action Plan provides a summary of the eligible projects and activities that will take place during the program year to address the priority needs and specific objectives outlined in the Strategic Plan. The eligible projects are associated with at least one priority need and at least one or more goals.

Projects

#	Project Name
1	Affordable Housing
2	Public Facilities & Infrastructure
3	Microenterprise/Economic Development
4	Public Service
5	Admin and Planning

Table 7 - Project Information

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

The all-volunteer CDBG Advisory Board followed both the City's Anti-Poverty Strategy and Consolidated Plan priorities in their review of project applications. More focus will be placed on impact and moving people out of poverty and not numbers served. In addition, emphasis will be placed on projects that demonstrate efficiencies or collaboration, or a project proposal seeking to implement such efficiencies.

The biggest obstacle to addressing underserved needs continues to be insufficient resources. The City will continue to pursue additional federal, state and private resources but does not expect to overcome the obstacle of shrinking public resources. While the federal COVID response packages, and the American Recovery Plan Act (ARPA) provide significant and needed assistance to Burlington, these aid packages do not cover the full extent of need and economic losses due to the pandemic. The City will also continue to work with partners to leverage funds, prioritize resources for those in greatest need and engage in collective impact initiatives.

Other obstacles to meeting underserved needs include:

- Ensuring a just and equitable recovery to rebuild after the economic losses incurred due to the pandemic;
- Limited land available in the city for housing and commercial development;
- Community tension between the need for development and the desire to preserve the status quo, between the need to rehabilitate and maintain the housing stock and the desire for architectural and historic preservation;
- The requirements around criminal, eviction and credit histories in rental housing placement and hoarding / housekeeping issues, as well as no cause eviction, in rental housing stability;
- The lack of availability of transportation, especially for residents with special needs and for second shift and weekend work, acerbated by a regional mismatch in the balance of job growth and housing development;
- Benefits “cliffs” which, together with a lack of understanding among residents, businesses and service providers about the asset and earnings limits that often vary between different income support programs, are a disincentive to increased earnings;
- Lack of small-scale risk capital financing;
- Non-accessible, and therefore non-functional, space in vacant upper stories of existing buildings; and
- A regional imbalance between the growth of regional employment and tax revenues and the budgetary burdens associated with its high concentrations of low-income residents, magnified by the high proportion of tax-exempt property within the City.

AP-38 Project Summary

Project Summary Information

1	Project Name	Affordable Housing
	Target Area	City-Wide
	Goals Supported	DH 2.1 Acquire/Rehab Rental or Owner Units DH 1.3 Create New Affordable Housing
	Needs Addressed	AFH - Maintain or Preserve Affordable Housing AFH - Increase Affordable Housing Opportunities
	Funding	CDBG: \$400,843 HOME: \$840,512
	Description	To provide Housing Improvement Program (HIP) for homeowners and to create new affordable housing units through rehab and/or construction.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	122 low-moderate income households: CHT HIP – 6 Cathedral Square Senior Living – 108 HOME projects - 8
	Location Description	Scattered sites – City-Wide
	Planned Activities	\$167,883 CHT – Housing Improvement Program (HIP) \$232,960 Cathedral Square – Senior Living \$840,512 HOME projects
2	Project Name	Public Facilities & Infrastructure
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA
	Goals Supported	SL 1.3 Improve Public Facilities & Infrastructure
	Needs Addressed	Improve Public Facilities or Infrastructure
	Funding	CDBG: \$528,000
	Description	To improve the Moran infrastructure including improvements at Burlington’s waterfront public access spaces and to redevelop the VFW center to better serve low-income Burlington veterans.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	City-wide benefit, 59.75% low-moderate income
	Location Description	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide
	Planned Activities	\$300,000 CEDO – Moran \$228,000 CHT – VFW service center
3	Project Name	Microenterprise/Economic Development
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide
	Goals Supported	EO 1.1 Support Microenterprises
	Needs Addressed	AFH - Increase Employment/Economic Opportunities
	Funding	CDBG: \$222,000
	Description	To fund two microenterprise programs, CVOEO-Financial Futures: Micro Business Development and Mercy Connections-Small Business Equity Program, with a focus on women, and other micro businesses. The City of Burlington will also deliver grants and technical assistance to micro enterprises.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	173 low-moderate income individuals: Micro-enterprise technical assistance and grants - 20 CVOEO – 80 Mercy - 73
	Location Description	Services will be provided to persons City-Wide with a focus on businesses located in the NRSA.

	Planned Activities	\$50,000 CEDO-Technical Assistance \$50,000 CEDO- Micro-business Grants \$65,000 Mercy Connections-Small Business Equity Project \$57,000 CVOEO-Micro. Business Development Program
4	Project Name	Public Service
	Target Area	City-Wide and NRSA
	Goals Supported	EO 1.3 Reduce Economic Barriers-Early Childhood EO 1.4 Reduce Economic Barriers-Access Resources
	Needs Addressed	Reduce Barriers to Economic Opportunities
	Funding	CDBG: \$100,127
	Description	To provide funds for two Early Childhood programs, ECHO-Early Learning and Lund-Early Childhood Education Program with a focus on supporting vulnerable children and families. To a workforce development program, ReSOURCE-YouthBuild and CVOEO-Volunteer Income Tax Assistance program to reduce barriers to economic resources and opportunities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	711 low-moderate income individuals: ECHO – 90 CVOEO – 600 Lund – 15 ReSOURCE – 6
	Location Description	City-Wide and NRSA
Planned Activities	\$28,127 ECHO-Early Learning Program \$15,000 CVOEO-Volunteer Income Tax Assistance (VITA) \$27,000 Lund-Early Childhood Education Program \$30,000 ReSOURCE-YouthBuild	
5	Project Name	CDBG and HOME Administration
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide
	Goals Supported	Planning and Administration

Needs Addressed	Planning and Administration
Funding	CDBG: \$152,743 HOME: \$46,091
Description	Administration funding for CDBG and HOME grants.
Target Date	6/30/2023
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	NEIGHBORHOOD REVITALIZATION STRATEGY AREA City-Wide
Planned Activities	To support the capacity of the nonprofit institutional delivery structure in the City; pursue State and Federal resources in support of City initiatives; implement City planning efforts; administer community and economic development programs; and support fair housing efforts in the City.

AP-50 Geographic Distribution – 91.220(f)

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

Approximately 62.5% of the City's CDBG resources are directed to activities that target the City's Neighborhood Revitalization Strategy Area.

The City of Burlington's Neighborhood Revitalization Strategy Area was approved in January 2006 and reapproved with the 2013 Consolidated Plan. The NRSA covers census tracts 3, 4, 5, 6 and 10. As of the 2010 Census, there were 15,927 residents in the Target Area. The Area as a whole is primarily residential, though within the designated census tracts are also several commercial corridors, the Central Business District and the Intervale (several hundred agricultural acres). As of the 2010 Census the Target Area contains a composite low/mod percentage of low- and moderate-income residents of 68.5%, down from 71% during the 2000 census. However, the poverty level data for the target area, using the 2012-16 American Community Survey shows that of the total population in the target area, 33.8% are living below poverty level. For children under 18, 21% are living below poverty level. For the adult category ages 18-64, 36.5% are living below poverty level. For the category of seniors over the age of 65, 18.9% of the population is living below poverty level. The highest concentration of households living below poverty level exists in census tract 5 where more than half the population is living below poverty level.

Geographic Distribution

Target Area	Percentage of Funds
NEIGHBORHOOD REVITALIZATION STRATEGY AREA	62.5
City-Wide	37.5

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The rationale for allocating investments into the NRSA is based on the levels of distress and high incidence of households living below poverty level in those census tracts. According to the Needs Assessment in the Consolidated Plan, there is a disproportionate need existing among several minority groups, and specific census tracts housed more minorities than others. Special needs housing resources appear concentrated in the New North End as a "Naturally Occurring Retirement Community." However, CDBG and HOME resources may be directed outside of the target areas based on individual household needs and on the City's desire to continue to have

affordable housing, economic opportunity and a suitable living environment available to low- and moderate-income residents throughout the City.

Discussion

As of the end of March 2022, the HUD GIS system was not updated with the new 2020 Census/ACS data. This section will be updated with new data in next year's Consolidated Plan.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Housing is the essence of Burlington's neighborhoods. Support for affordable housing allows elders to remain in the homes and neighborhoods they know. Homebuyer purchase and rehabilitation programs allow the next generation of residents to own and modernize older homes.

Affordable housing is a balance to economic development. In boom times, affordable housing ensures that there is housing for workers and that rising prices do not displace residents. In a troubled economy, affordable housing development is an economic engine and its subsidies ensure that low-income residents are not made homeless. Finally, the use of affordable housing to redevelop distressed neighborhoods prevents the loss of value of the surrounding properties and encourages long-term investment by other property owners.

This section of the Action Plan specifies the goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year.

One Year Goals for the Number of Households to be Supported	
Homeless	
Non-Homeless	92
Special-Needs	
Total	92

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	
The Production of New Units	32
Rehab of Existing Units	60
Acquisition of Existing Units	
Total	92

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

Discussion

AP-60 Public Housing – 91.220(h)

Introduction

The Burlington Housing Authority completed the conversion of its public housing units to the Section 8 Project-Based Voucher Program through the HUD Rental Assistance Demonstration (RAD) program. Our jurisdiction no longer has any public housing units.

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

Our jurisdiction no longer has any public housing units.

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

BHA has formed a Resident Advisory Board (RAB) with representatives from the Section 8 program. The RAB meets periodically to provide input on BHA's Plans and Policies. BHA will provide continuing financial and staff support to any active resident association in its properties. One BHA program participant serves on the BHA Board of Commissioners.

BHA supports the Section 8 Homeownership Program.

BHA endeavors to provide a good living environment in its affordable housing developments through effective screening and strict lease enforcement. In addition to the Family Self-Sufficiency program, the Burlington Housing Authority supports programs such as the DREAM mentoring program and the Summer Lunch program. BHA has also initiated a Housing Retention program to work with residents who are at risk of losing their housing.

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

The Burlington Housing Authority is not designated as troubled.

Discussion

The City will work with BHA to increase funding for resident service programs for its program participants, including the Family Self-Sufficiency Program, youth mentoring, homeownership, homelessness prevention, independent living and service-enriched housing.

BHA operates a very successful Section 8 Housing Choice Voucher Homeownership Option Program. Section 8 program participants are eligible and are encouraged to participate in this program. BHA's Section 8 Mortgage Assistance Program has been in operation since 1999 with over 100 households successfully transitioning from renting to homeownership. The City supports the implementation and continued availability of BHA's Section 8 Homeownership Option Program.

The Burlington Housing Authority's Family Self-Sufficiency Program moves families toward economic self-sufficiency through access to career counseling, job training, child care and other

services, and through escrow accounts with funds made available to participants at the end of the enrollment period.

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

Introduction

In this section of the Plan, the City addresses the one-year goals and specific activities planned this program year to carry out the homeless strategy outlined in the Strategic Plan for the City's Five-Year Consolidated Plan. Activities that will address outreach, emergency shelter, transitional housing, homeless prevention, housing placement, supportive housing and independent living are listed below and under the project section. This section will be subject to change as the impact of the COVID-19 pandemic, associated recovery funds, and changes to emergency housing provision become evident in Spring of 2022.

The Continuum of Care coordinates the implementation of a housing and service system, from outreach to housing to services, to meet the goal of keeping homelessness rare and brief in our community. Street Outreach Teams and outreach caseworkers serve to reach the chronically homeless, identify services and housing needed. Vermont 211, daytime shelter and meals served at both the Community Resource Center, Chittenden Emergency Food Shelf and the Salvation Army provide points of contact for the homeless and referrals to services. Housing providers work to rapidly re-house and stabilize, especially using the Housing First model, for the chronically homeless. Supportive service providers add case management and assess needs for services. The Continuum as a whole has implemented a coordinated entry system and standardized assessment to enhance the current service delivery system.

The CoC leads the coordination of response to the pandemic for the community of people experiencing homelessness in Chittenden County. Regular coordination meetings occur, supporting consultation with State and local bodies for effective pandemic response to the large increase in our homeless population.

The City serves as the Collaborative Applicant for the Chittenden County Homeless Alliance (CoC) and supports its applications for HUD and other funding to address both chronic and non-chronic homelessness. The CoC implements the Coordinated Entry System. Chittenden saw a dramatic, almost threefold, increase in the number of people experiencing homelessness in the 2021 PIT count, as a result of the pandemic. The CCHA and the City of Burlington are collaborating to strengthen systems to identify solutions through coordinated entry to impact and reduce chronic homelessness to functional zero. The City of Burlington has committed recovery funds to support the Coordinated Entry system.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness

including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Chittenden County Homeless Alliance (CCHA) serves the homeless in the Greater Burlington metropolitan area and direct services are delivered through a consortium of nonprofit organizations, faith-based organizations, housing developers, government agencies, and the Burlington Housing Authority.

CCHA utilizes several outreach procedures to engage homeless individuals and families. These include services and outreach from the local food shelf, daytime drop-in shelter, and Salvation Army, supplemented this year by a daytime warming center. A SAMHSA funded PATH grant funds outreach work in our community for two outreach positions to find and connect with the homeless who are mentally ill and difficult to engage, offering persons who are experiencing homelessness community-based services. A street outreach team, funded by our Police Department, Church Street Marketplace, City and local businesses, provides outreach to individuals, families with children, and youth sleeping on the streets in our downtown area. Street Outreach is also provided by Champlain Valley Office of Economic Opportunity. The Burlington Police Department has implemented a team of Community Support Liaisons that include outreach in their responsibilities. An Adult Local Interagency Team helps to identify unsheltered persons and provide consultation and expertise to help resolve difficult situations involving chronically homeless persons with multiple physical or emotional issues in securing and utilizing services. These teams identify individuals and families who are homeless and connect them with our Coordinated Entry System. The system was developed to assess and match homeless households for eligible services based on vulnerability, sustainability, and length of homelessness through a standardized, scored assessment. Each eligible household will be assigned a housing case manager and added to a master list of homeless households which is reviewed on a weekly basis by coordinated entry partners for appropriate housing opportunities

Some of the goals for outreach this year include the following which are funded by a myriad of resources:

Continue to provide outreach to the more than 450 adults and children currently housed in hotels under the Emergency Housing Initiative.

With CDBG funding from 2021, supportive housing services will continue to assist 96 chronically

homeless individuals in the area with Pathways Vermont and ANEW Place and 899 women and children experiencing domestic violence with Steps to End Domestic Violence

The SAMSHA funded outreach will also use the joint HMIS for input and tracking and refer clients to the Coordinated Entry System.

ANEW Place will continue to operate the new year-round Warming Shelter and with ESG/HOP funds maintain a coordination to work with homeless (unsheltered) clients year-round to ensure on-going case management and connection to services and housing. The City of Burlington is working to establish additional emergency shelter beds, to meet need.

The Consolidated Plan supports outreach and homeless shelter services. New housing programs and applications for new housing are built on a Housing First model.

Addressing the emergency shelter and transitional housing needs of homeless persons

There are two emergency shelters serving single adults including veterans: COTS Waystation and ANEW Place. COTS operates the Firehouse and Main Street Family Shelters for households with children. COTS Daystation is a drop-in center for homeless adults and families. The confidential shelter operated by STEPS to End Domestic Violence serves homeless women and children fleeing domestic violence was expanded in this year, in response to pandemic related needs. Spectrum Youth and Family Services operates a shelter for homeless youth. Pandemic related de-concentration has been reversed to the extent possible with ongoing COVID-19 infections. Each shelter and hotel space offer case management and housing search assistance to help participants move out of shelter into transitional or permanent housing, with necessary follow-up support for maintaining housing. It remains a goal of the Jurisdiction and the Continuum to increase the actual number of permanent housing and permanent supportive housing options, so that participants will have opportunities to quickly transition out of the emergency shelters.

With 2021 CDBG funding, the following goal will be achieved: over 560 households, including adults and children fleeing domestic violence, will receive shelter and services through STEPS in the next year.

With local, state and other federal funding, two emergency family shelters will house up to 60 individuals through COTS, pandemic recovery permitting. Spectrum will house up to 8 youth in their emergency shelter and 8 in their Pearl Street SRO transitional housing. Single adults will have access to 56 emergency housing beds at Waystation and Anew Place and 11 individuals or

family members will have access to emergency housing at COTS' Smith House. ANEW Place will continue to operate the new year-round, non-congregate, low barrier facility at the Champlain Inn. The City is working to open additional low barrier Emergency Shelter, to respond to need.

ESG funding is used for emergency shelter operations and case management, Rapid Re-housing Rental Assistance, and HMIS.

In addition to these programs, the State of Vermont continues to serve those experiencing homelessness who qualify with an Emergency Services Motel Voucher program with cold weather exemptions available to those in need when temperatures drop below freezing. This program was expanded for COVID response and currently provides outreach services and emergency accommodation to more than 500 individuals in Chittenden County. This program will return to pre-pandemic eligibility in July 2021 and a Transitional Housing program in hotels, utilizing ERAP funds, is expected to replace many of the General Assistance bed nights.

With ARPA funding the City of Burlington in partnership with CVOEO created a Community Resource Center for Winter 2021/2022, this will become a permanent year-round facility in 2022, to provide space and access to essential services.

Transitional Housing is also provided by several member agencies of the Continuum. COTS provides transitional housing to homeless individuals and families. The Howard Center's Transitional Housing Program provides housing for 6 homeless persons with mental illnesses. Spectrum provides transitional housing for youth in the community. STEPS delivers transitional housing options for victims of domestic violence. Transitional housing is available for women exiting corrections. Veterans have transitional housing opportunities in nearby Winooski.

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 City of Burlington is committed to the retention of affordable housing units with expiring tax credits and commits local, state, and federal resources to this goal. Keeping the inventory of affordable units as well as increasing the number of affordable housing units are key to helping our most vulnerable residents remain housed.

The Continuum and its partners are committed to transitioning homeless persons into permanent housing and have implemented the coordinated entry system and a standard assessment tool to facilitate this goal. Additionally, the Homeless Management Information System (HMIS) is used to create a Community Master List of persons experiencing homelessness prioritized by vulnerability. The CES and CoC-funded PSH projects and agencies utilize the Housing First model and rapidly re-house chronic homeless with a high success in clients who maintain their housing. The CoC saw a dramatic pandemic related increase in the number of chronic homeless and is re-engaging with Built for Zero to end chronic homelessness over three years. The statewide response is providing emergency shelter in hotels under the Emergency Housing Initiative, along with outreach and coordinated entry to support transition into permanent housing. Significant development of permanent housing for those experiencing homelessness is underway, supported by recovery funds.

Burlington agencies utilize a range of housing retention programs to assist at risk households in maintaining their housing. These services include wrap-around support services, a hoarding task force, landlord advocacy, and a Risk Guarantee Fund used to mitigate risks on the hardest to house persons. Our local Continuum continues to advocate for increased state resources such as the Rental Subsidy Program and the Mental Health Subsidy Program that can be used to help keep at-risk families housed. The State provides COVID response support in the form of two significant emergency rental assistance programs.

Community-based organizations provide job training and placement, substance abuse counseling and referrals for treatment, medical and dental care, legal advocacy and representation, mental health counseling and residential treatment programs, child care, housing search assistance and security deposit assistance to help homeless families transition to permanent housing and independent living.

The CoC partners with local, state, and federal organizations and landlords to combat homelessness among veterans. Previously unidentified veterans were enrolled in VA care and many are housed through VA housing programs. The VA maintains a state-wide by name list and reviews cases on a monthly basis.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs.

Several agencies administer prevention services including home heating fuel aid, transportation, housing navigation, tenants' rights advocacy, and legal assistance. The Housing Opportunity Program (funded by the State of Vermont and administered at local agencies), also provides case management, short term rental subsidies, and back rent, along with case management for low income individuals and families at risk of losing their housing.

Youth exiting foster care in Vermont have two primary supports that protect them from being discharged into homelessness as they exit legal custody at age 18: the Youth Development Program funded with federal Chafee Foster Care Independence Program and state funds & Act 74 Youth in Transition Extended Care Program. These programs are in addition to the programming run directly by the VT AHS-Dept. of Children & Families Services. In this program, a number of youths formerly in foster care are supported with case management and connected to long-term rental assistance with local Housing Authorities, including a VT State Housing Authority Sect. 8 HCV waitlist preference for youth aging out of foster care as part of the HUD Family Unification/Youth-in-Transition Programs. Some live on campus at area colleges to pursue education. The College of St. Joseph in Vermont specifically helps foster youth transition to college by providing year-round housing and support services, and the Adult Living Program provides a stipend for households willing to host an 18 to 22-year-old leaving foster care.

Hospital patients are routinely discharged to their previous residence, a nursing home, or medical respite beds. McKinney Vento funded programs are used as needed and include emergency shelters and some transitional/permanent housing programs when appropriate.

Persons discharged from a mental health treatment or community bed receive state-funded assistance through the Vermont Department of Mental Health (VT DMH) Subsidy & Care Program, VT DMH Housing Contingency Fund and the VT DMH Housing Recovery Fund. In addition, state agencies collaborate with the Burlington Housing Authority, and other affordable housing agencies to utilize Section 8 Housing Choice Voucher Programs for tenant-based and project-based rental assistance units funded by the Low-Income Housing Tax Credit Program. Patients are routinely discharged to Howard Center transitional or step-down programs such as Second Spring, Meadowview, Next Door Program, and 72 North Winooski group home which are not McKinney Vento funded programs. Some persons leaving corrections can go to their previous residence, a transitional housing program for offenders, or to live with family.

Discussion

Veterans and their families have both transitional and permanent housing options and services available to them along with specialized outreach, assessment and additional services to meet their unique needs. The National Hotline refers calls directly to the area case manager; VASH vouchers are administered locally and through new grant programs, and a Housing First model will be implemented for any chronically homeless veterans.

Unaccompanied youth have emergency shelter, transitional and permanent housing options available to them along with specialized outreach and services to assist them in learning to live independently, set goals and complete their education.

Frail elderly and those with special needs are served through Cathedral Square and Ethan Allen Residence where 72 Burlington seniors will receive Level Three care. Through the HomeShare program and with the help of the City's Housing Trust Funds, over 50 elderly and/or disabled will be able to remain safe in their homes.

Service-enriched housing needs for the population with severe mental illness range from affordable, independent apartments with support services provided by visiting mental health workers to 24-hour supervised "group home" settings. There is a need for additional supportive housing at all levels for those living with severe mental illness.

According to a national Survey on Drug Use and Health prepared by the U.S. Substance Abuse and Mental Health Services Administration (SAMSHA) 2012-14, an estimated 2.95% of the Champlain Valley's population, ages 12 and older need treatment for an illicit substance abuse problem. Residents would also require affordable, appropriate, alcohol-free and drug-free housing with a range of management and supportive services, from a high level of on-site management (for treatment and early recovery) to self-management in housing such as Oxford Houses to self-management in an at-home setting.

All these projects and activities will be undertaken during this next year to address the housing and supportive services needs for persons with special needs.

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

Introduction:

The City has addressed the barriers to affordable housing under the Market Analysis and Strategic Plan sections of the Consolidated Plan. There is a limited supply of housing units at all levels of the market and a low vacancy rate exacerbates the issue. In addition, our extensive student population creates a significant impact on Burlington's housing market. Over the years, many traditional single-family homes have been converted to student housing to accommodate the market, creating both an impact on the cost of housing and the change in neighborhoods. Burlington has a significantly higher percentage of renters and the cost of rent is increasing at a higher rate. Not only is the cost of housing high and the availability low, but the condition of the City's housing is noted as the 7th oldest housing stock in the nation. Public policies that are controlled at the local level which impact the cost of housing include policies on historic preservation and lead-based paint safety practices. These homes need energy efficient upgrades, lead-based paint hazard reduction, and other rehabilitation to make them safe, affordable and sustainable over the long term. The cost of housing is also impacted by accessibility and fire safety public policies. In conjunction with planBTV and the Housing Action Plan, these concerns will be examined in order to facilitate infill development and diversified housing options in the City and especially in the downtown area.

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

In the Mayor's and City Council's Housing Action Plan, 22 initiatives were outlined to decrease the cost of housing, increase the supply of housing and ensure Burlington is more affordable, inclusive, livable, walkable, sustainable, and vibrant for all its residents. The first section of the Plan focused on addressing some of the regulatory barriers that have limited Burlington's ability to create new subsidized and non-subsidized housing options over the last 15 years. In the second section, the Housing Action Plan focused on using existing municipal tools strategically and expanding public resources to develop perpetually affordable low-income housing, promote the value of inclusion described in the City's inclusionary zoning ordinance, and better support those not eligible for subsidy but unable to compete within Burlington's housing market. The final three categories of the Plan, while related to the fundamental challenge in

Burlington – a lack of housing stock – focused on continuing community challenges that extend beyond questions of supply and demand.

Discussion:

On Feb 18, 2020, the Burlington City Council adopted changes to the Zoning ordinance related to **Accessory Dwelling Units. Zoning amendment 20-03** encouraged the creation of accessory dwelling units (ADU's) throughout the city to support homeowners as they age in place, provide flexible options to help owners afford and better utilize available space within their homes, and to provide additional affordable housing options within existing neighborhoods. This amendment modifies applicable ADU and other citywide general standards, including enabling ADU's as a permitted use in all zoning districts, creating an alternative maximum unit size and lot coverage waiver process, and eliminating the parking requirement.

In September 2020, the City reformed its parking minimum requirements for building new parking in residential developments in the downtown and along key transportation corridors in order to reduce a major cost driver of housing, give people more choices when it comes to the cost of car ownership and take a step toward aligning the City's land use policies with its climate goals. Since the adoption of this policy reform, two significant projects have applied for permits to create housing that would benefit from this policy change, for a combined 490 new homes.

The City will continue to work with the Vermont Legislature to ensure fair property tax policy for deed-restricted, perpetually-affordable owner-occupied homes. There are over 200 such homes in Burlington and the City will continue to advocate for taxation based on the restricted value of the subjected homes.

AP-85 Other Actions – 91.220(k)

Introduction:

Burlington aims to spend over 95% of CDBG expenditures assisting low-and moderate-income residents. The City will continue its commitment to the preservation of affordable housing units and actions that will foster and maintain affordable housing in Burlington. In addition, the City, through the Community & Economic Development Office, will diligently work to reduce lead-based paint hazards in the homes of local residents.

The activities listed in this Action Plan work to reduce the number of households in poverty; and with enhanced coordination with nonprofit partners, services will have a greater impact on this goal.

Actions planned to address obstacles to meeting underserved needs

As identified in the Consolidated Plan, the principal obstacle to meeting underserved needs is insufficient resources. Given the significant disruptions to economic and social activity over the past year due to the pandemic, available resources must still be used strategically as the need exceeds the available funding. Fortunately, the federal COVID response packages, such as American Recovery Plan Act (ARPA) provided significant and needed assistance to Burlington to help respond to the pandemic and begin recovery efforts, these aid packages form part of a patch work of private and public resources, including funds such as CDBG and HOME, to meet the most critical unmet needs.

In addition to recovering from the economic losses sustained over the pandemic, the City needs to also look forward to the future to foster continued growth to foster economic opportunities. The City will continue to grow the grand list, pursue additional federal, state and private resources, but does not expect to overcome the obstacle of shrinking public resources. The City will also continue to work with partners to examine obstacles such as benefits cliffs and to advocate for appropriate policy changes. In addition, the City will encourage local agencies to explore ways to deliver services in a more cost-effective and efficient manner, prioritize resources to serve the most in need, as well as cooperate between agencies.

For more than a decade, the network of community-based services that support the social, educational, physical, mental and financial well-being of families and individuals in Vermont has been under financial pressure. Again, while the funding available over the past year expanded significantly with ARPA funds, the unmet needs to be addressed were greater than seen previously. The number of families and individuals needing services increased significantly over

the past year, and in many cases, their needs have become more acute and complex. In response to these conditions, service providers increased their efforts to find economies of scale, evaluated the effectiveness and appropriateness of the services they provide, experimented with innovation, and adjusted the frequency and intensity of services. A key challenge moving forward will be fostering a just and equitable recovery that rebuilds economic opportunity for all, while ensuring that gaps in social services continue to be met, especially as surplus funding for expanded services diminishes into late 2022 and 2023. The City's efforts over the next year will be monitoring the recovery across sectors and populations to ensure the recovery is comprehensive and equitable. Should existing needs and gaps intensify or new needs emerge, the City proposes to work with partners to meet the dynamic and evolving needs through the recovery process.

Actions planned to foster and maintain affordable housing

The City has launched a comprehensive strategy to effectively end chronic homelessness and promote affordable housing. This work includes the relaunch of the Built for Zero partnership in Burlington. This comprehensive plan leverages, State, local and federal resources, including CDBG and HOME funds as well as surplus ARPA funding. The key goals of the City's strategy are summarized in the ten points below:

1. Invest at least \$5 million of ARPA funds, with at least \$1 million designated for initiatives to better serve the chronically homeless and \$4 million to build new permanently affordable housing.
2. Create a Special Assistant to End Homelessness position within the City's Community and Economic Development Office (CEDO) to provide a single point of accountability for expanded community effort.
3. Strengthen through new investment Chittenden County's "Coordinated Entry" command center team that drives weekly progress towards functional zero with a comprehensive, real-time, by-name data effort.
4. Support the creation of 78 new homes for formerly homeless residents (25 percent of the goal for new, permanently affordable housing) by partnering with affordable housing developers.
5. Invest in approximately 30 shelter pods and related infrastructure to create a new low-barrier facility for 2022.
6. Set a goal to support the creation of 1,250 total homes, including 312 permanently affordable homes, by the end of 2026 (25 percent of the total Building Homes Together 2.0 goal).
7. Fully fund the Housing Trust Fund to voter-approved levels in fiscal year 2023.

8. Open new housing opportunities through the creation of a mixed-use Enterprise Innovation District in a portion of the South End.
9. Open new on-campus University of Vermont (UVM) student housing opportunities by rezoning the former Trinity Campus to reduce UVM's pressure on the housing market.
10. Open new housing opportunities City-wide through "missing middle" zoning reforms, which will expand opportunities for new homes to be created in every neighborhood in ways that reflect the character of these parts of the City.

Actions planned to reduce lead-based paint hazards

In January 2021, the City of Burlington received a \$3,093,922.00 Lead-Based Paint Hazard Control grant from the Department of Housing and Urban Development and a \$530,000.00 Healthy Homes grant to complete work on 110 housing units by July, 2024. These funds are administered through the Community and Economic Development Office by the Burlington Lead Program to reduce lead-based paint hazards and healthy homes hazards in eligible units to eliminate childhood lead poisoning and make homes healthier to live in. From July 1, 2022 – June 30, 2023, the Burlington Lead Program plans to evaluate 58 units for lead-based paint and other health hazards, reduce lead-based paint hazards in at least 41 housing units and reduce other health hazards in 35 housing units, conduct 12 community outreach and education events, and provide lead-safety training to at least 120 individuals.

Actions planned to reduce the number of poverty-level families

All of the activities funded through the City's CDBG and HOME programs are ultimately directed at reducing the number of people living in poverty, providing for basic needs, or preventing individual/family poverty in Burlington. Specific details of the proposed initiatives are described in the project section of this Action Plan.

Actions planned to develop institutional structure

A definite challenge for the Community & Economic Development Office will be to effectively adapt its institutional structure to meet the changing needs of a challenging fiscal environment and in pandemic response. In a time of significant budget changes and program and funding expansion, to respond to the economic difficulties brought about by the pandemic, CEDO will need to find ways to implement, oversee, and monitor programming efficiently and effectively to meet increasing demands for services and funding with changing resources.

The Collective Impact, a multi-stakeholder group initially organized by the United Way,

continues to build institutional structure around results-based accountability and collaborative problem solving including a funding collaborative partnership.

The Chittenden County Homeless Alliance, through its governance reorganization and common agenda plans to use administrative backbone support to increase institutional capacity within their collaborative structure. The CCHA will continue to perform a vital expanded role in coordination and pandemic response, to provide needed supports to the more than doubled population of individuals and families experiencing homelessness.

The City will continue to operate the Burlington COVID-19 Resource and Recovery Center (RRC) to offer quick frontline assistance and support on a wide range of issues to all Burlington residents in need of help during the COVID-19 pandemic. The RRC has focused on ensuring Burlington residents access to critical resources like health guidance, food, and shelter. Additionally, the RRC has been helping Burlington residents with recovery efforts like connecting people experiencing homelessness with temporary shelter that meets social distancing safety measures, assisting laid-off workers with unemployment insurance applications, working with local small businesses to help them navigate insurance claims for federal and state resources, coordinating the dissemination of health and other resource guidance in multiple languages to reach as many members of our community as possible, and many others.

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

In order to enhance coordination between public and private housing and social service agencies, several community-wide initiatives are utilizing collective impact principles. These initiatives are deciding on a common agenda to keep all the various organizations moving toward the same goal. Agencies agree on common progress measures and use a data-driven approach to review outcomes. Rather than working in silos or duplicating activities, the organizations leverage mutually reinforcing activities to move toward the progress envisioned. With clear and frequent communication and one specific organization taking on the role to manage the collaboration, these initiatives are enhancing coordination and cooperation. One specific example of this is the work of the Chittenden County Homeless Alliance (CCHA). The Community & Economic Development Office coordinates with the Chittenden County Homeless Alliance and Continuum of Care to address homelessness (including for-profit and nonprofit housing entities and service providers). CCHA has a common agenda and performance

measures. Coordinated entry for permanent housing meets and refers clients for housing and services. The current Housing Resource Team continues to work collaboratively through public, private housing and social service agencies. In another example, a group of agencies including United Way of Northwest Vermont and the City of Burlington via the Burlington Police Department, the Agency of Human Services, University of Vermont Medical Center, Vermont Department of Health, and others are part of a collective impact project regarding the burgeoning opioid addiction crisis impacting our area.

Program Specific Requirements

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

Introduction:

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	\$30,000
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.	\$585,000
5. The amount of income from float-funded activities	0
Total Program Income	\$615,000

Other CDBG Requirements

1. The amount of urgent need activities	0
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HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

All HOME funds are invested in a manner consistent with 24 CFR 92.205(b)(1). Specifically, HOME funds are invested in interest-bearing and non-interest-bearing amortizing loans and in deferred loans and grants.

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:

For homebuyer projects where the Program provides HOME funds for low-interest loans for eligible homebuyers to assist with down payment and closing costs on eligible two to four-unit owner-occupied properties, the Program uses “recapture” provisions per 92.254(a)(5)(ii). These loans are secured by subordinate mortgages. When properties assisted with HOME funds for this purpose are sold, transferred, or if the primary residency is violated, then the full amount of the loan plus any accrued interest is to be repaid to the Program. Only the direct subsidy (down payment assistance, closing costs, or other HOME assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and the reduced sales price attributable to HOME development assistance) is subject to recapture. However, the recapture amount shall not exceed the amount available from net proceeds. The net proceeds are the sales price minus loan repayment(s) (other than HOME funds) and closing costs. If this repayment occurs during the Home Affordability Period (HAP), then the funds are not considered to be program income. If this repayment occurs after the HAP, then the funds are considered to be program income. The written agreements shall include language that makes it clear that recaptured funds after the HAP shall be considered program income.

When a property owner assisted with HOME funds for this purpose refinances their principal mortgage, the Program shall consider executing a subordination agreement upon receiving a written request with sufficient documentation on current fair market value and proposed refinancing amount. When considering such requests to subordinate its HOME mortgage, the Program shall require that the loan-to-value ratio be no greater than 100%.

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:

Resale Policy for HOME Subsidy on Owner-Occupied Homes: For homebuyer projects which are developed by nonprofits and which have perpetual affordability, the City uses “resale” provisions per 92.254(a)(5)(i) when HOME funds are used. During the HAP, the property must be sold to a low-income homebuyer. The original buyer of the HOME unit shall receive fair return on investment. The Burlington HOME program defines "fair return" by the following formula: Fair Return = Sale Price - Outstanding Mortgage Debt - 75% of the market appreciation (if any) + the capital improvement credit. The Program defines capital improvements as any investment in the house that is not considered maintenance. Items

like appliances, flooring, painting, roof, heating systems, electrical or plumbing are considered maintenance and not eligible. Most common capital improvements are finishing basements, adding decks, garages, sheds, square footage, baths, or upgrades in flooring or kitchens. This definition of “Fair Return” will typically return to the seller their original equity investment if the original purchase price is less than or equal to the sale price to the new buyer. In the event that a HOME “resale” unit sells for less than the original purchase price, then the difference comes from a reduction in the seller’s equity (from their down payment and/or reduction of loan principal). This is the equity sharing formula used by both the Champlain Housing Trust and Green Mountain Habitat for Humanity. The Burlington HOME program defines "affordable to a reasonable range of buyers" as a home where the sum of the annual loan principal, interest, taxes, and insurance is less than 33% of the household's annual gross income.

The Program shall not allow the resale of a HOME-assisted unit to a subsequent homebuyer who is not low-income. When a HOME-assisted homeownership unit that is encumbered (through the requirements of another funding source such as the Vermont Housing & Conservation Board (“VHCB”)) with covenants ensuring perpetual affordability for households below 80% of area median income is sold, resale provisions ensure compliance with the HOME affordability requirements during the HOME Affordability Period. HOME funds which go into homebuyer units are typically, but not always, grants. The Program does not recapture the HOME funds unless the VHCB covenants are extinguished and the affordability is no longer ensured. The only scenario where the Program can envision requiring repayment of the above funds is if a) the HAP had expired and b) the statewide funder, the VHCB (which requires permanent (99 Year) affordability), for whatever reason chose to extinguish their covenants and the project effectively was leaving the permanently affordable housing stock.

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:

Multi-family projects developed by locally-based housing organizations that receive HOME funds for rehabilitation may utilize HOME funds to refinance existing debt, consistent with 24 CFR 92.206(b)(2), if they meet the following guidelines:

- Refinancing is necessary to permit or to continue affordability under 24 CFR 92.252;
- Rehabilitation is the primary eligible activity. A minimum of \$7,500 of rehabilitation per unit

is required;

- The grantee must demonstrate management capacity and practices that ensure that the long-term needs of the project can be met, and the targeted population can be served over an extended affordability period;
- The grantee must demonstrate that the new investment is being made to maintain current affordable units, to create greater affordability in current affordable units, or to create additional affordable units;
- The minimum HOME affordability period shall be 15 years, and all HOME-assisted projects developed by locally-based housing organizations are required to be perpetually affordable;
- Refinancing will be limited to projects that have previously received an investment of public funds;
- HOME funds may be used for refinancing anywhere in the City of Burlington;
- HOME funds cannot be used to refinance multi-family loans made or insured by any Federal program, including CDBG.

Discussion:

It is the policy of the City of Burlington HOME Program to provide information and otherwise attract eligible persons in the housing market area to available housing constructed or rehabilitated under the HOME Program without regard to race, color, national origin, sex, religion, sexual orientation, familial status, receipt of public assistance, or disability. The City of Burlington HOME Program incorporates the Equal Housing Opportunity logo in its letterhead, press releases and advertisements. For projects where five or more units are being assisted with HOME funds, grantees receiving HOME funds are required to contact one or more of the following agencies before filling vacancies during the HOME affordability period as stated in the HOME Program Loan/Grant agreement: local or State Housing Authority, Community Action agencies, area Mental Health and Developmental Disability agencies, area Office on Aging agencies, area homeless shelters, the Department of Social Welfare, Committee on Temporary Shelter, Vermont Center for Independent Living or any statewide handicapped accessibility clearinghouse, area AIDS service organizations, medical centers, schools, municipalities and any other social service agencies. Any advertisement of vacant rental or ownership units during the HOME Affordability Period must include the equal housing opportunity logo or statement. Advertising media may include newspapers, radio, television, brochures, leaflets, or simply a sign in a window. Housing borrowers, grantees or property management agents must display the fair housing poster in areas that are accessible to the public. Property owners or their management agents must maintain a file containing a record of all marketing efforts (e.g.,

copies of newspaper ads, copies of letters). The City's HOME Program monitors compliance as part of its ongoing monitoring process. Where noncompliance is discovered, the HOME Program will provide technical assistance to secure voluntary compliance. If this proves unsuccessful, the HOME Program will refer aggrieved parties to appropriate entities to seek redress.

The City's HOME program uses the HOME affordable homeownership limits provided by HUD for homebuyer assistance and for rehabilitation of owner-occupied single-family housing. When using HOME funds with non-profit projects, the City accepts applications on a rolling basis and distributes funds as available to eligible and viable projects. Detailed information on applicant eligibility and how to apply can be found on the CEDO's website. The City does not limit or give preference to HOME applicants or beneficiaries.

A notice about the availability of funds was published online and in Seven Days in the beginning of December of 2021 and a direct email notice provided to over 100 nonprofits, City departments and residents about the funding. An informational workshop was held for applicants. All applications are published online on the City of Burlington's website www.burlingtonvt.gov/CEDO. The CDBG Advisory Board held three meetings in February 2022 – March 2022 to review all applications; the Board is comprised of representatives from the local Neighborhood Planning Assemblies, Mayoral selections, representatives of state agencies and local grant making agencies. These citizens make the recommendations on how to spend CDBG funds locally, and these recommendations are conveyed to the Mayor and City Council. These recommendations are the foundation for the Action Plan.

AP-05 Executive Summary Attachment

Entitlement Year: 2022
HOME Funds Breakdown
4/11/2022*

		Round up/down	Rounded numbers	Total Estimate for Action Plan
Total	\$460,912.00	N/A	\$460,912.00	\$886,603.00
15% CHDO Set-Aside	\$69,136.80	(round up)	\$69,137.00	\$69,137.00
5% CHDO Operating	\$23,045.60	(round down)	\$23,045.00	\$23,045.00
10% Admin	\$46,091.20	(round down)	\$46,091.00	\$46,091.00
Entitlement to be allocated to eligible projects	\$322,638.40	(round up)	\$322,639.00	\$748,330.00

Actual/Final
\$460,912

HOME Entitlement (EN) funds* carried over from previous years (for projects)	(round down)	\$425,691.00
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*as of the date above, not committed for projects

ENT22 Project Category	Subtotal	Item	Amount
Affordable Housing	\$840,512	Affordable Housing Projects	\$748,330
		15% CHDO Set-Aside	\$69,137
		5% CHDO Operating	\$23,045
Admin and Planning	\$46,091	HOME Administration	\$46,091

CDBG ENT22 Project Category	Organization(s)	Program Name	Award Amount
Public Service	ECHO	ECHO Early Learning	\$28,127
	CVOEO	Volunteer Income Tax Assistance (VITA)	\$15,000
	Lund	Early Childhood Education Program	\$27,000
	ReSOURCE	YouthBuild	\$30,000
PS Activity Total:			\$100,127