# Chapter 4

# Five-Year Strategic Plan

The FY 2005 - FY 2010 Garden Grove Consolidated Plan outlines the City's community development strategy for creating livable, vibrant, and safe communities. The five-year Housing and Community Development Strategic Plan is the centerpiece of the Consolidated Plan that sets forth the City's specific plan of action to address the goals, objectives, and measurement benchmarks necessary to address the needs identified in the needs assessment.

The Consolidated Plan encourages collaboration and community empowerment in four primary areas:

- 1. Development of decent and affordable housing;
- 2. Provision of community and supportive services;
- 3. Improvement of public facilities and infrastructure; and
- 4. Expansion of economic opportunities and anti-poverty activities.

In addition, the Strategic Plan discusses the institutional structure that exists and areas for improvement in delivering housing and community development services to the community.

# 4.1 Resources for Housing and Community Development Activities

The City of Garden Grove has access to a number of funding sources to address its housing and community development needs. Often, layering of multiple funding sources is required to adequately address community needs.

### 4.1.1 Resources Available

The Strategic Plan of this Consolidated Plan focuses on activities to be funded with the four entitlement grants (CDBG, HOME, ESG and ADDI¹) from HUD Office of Community Planning and Development (CPD). HUD allocates CDBG, HOME, ESG, and ADDI funding to eligible jurisdictions on a formula basis, using factors such as population, income distribution, and poverty rate. For Fiscal Year 2005/06, Garden Grove's estimated funding allocations are \$2,987,261 for CDBG, \$115,571 for ESG, \$1,124,909 for HOME, and \$30,097 for ADDI. For the five-year period covering July 1, 2005 through June 30, 2010, the City has planned for the following funding allocations:

CDBG: \$14,936,305
 HOME: \$5,624,545
 ESG: \$577,855
 ADDI: \$150,485

These funding levels are predicated on a steady stream of funding from the federal government. However, the future of some of these programs is uncertain as of the writing of this Consolidated Plan. Should funding for these programs be cut in the future, the City's ability to achieve the programs and objectives included in this Plan may be significantly compromised.

# Leveraging of Other Resources

Various funds are available to leverage the HUD funds. The following are two of the key funding sources that have been used to leverage HUD resources.

### Garden Grove Housing Authority

The Garden Grove Housing Authority operates under federal grants received from HUD to provide rental subsidies to low income (50 percent MFI) families. The program currently assists over 2,300 Garden Grove households. In addition, the Garden Grove Housing Authority works with approximately 235 very low income households through the Family Self-Sufficiency (FSS) Program. This program assists households to find full-time, skilled, or higher-pay employment. The funding level is determined annually by Congress. Currently funding is approximately \$23 million per year.

#### Garden Grove Redevelopment Agency

The Redevelopment Agency places 20 percent of their tax increment funds into a Housing Set-Aside Fund to be used for the development or rehabilitation of affordable housing. This amount is dependent on the amount of tax increment the Agency receives annually. Approximately \$3 million in annual revenue is estimated from this source. Programs currently supported by redevelopment set-aside funds include the construction of new affordable ownership and rental housing, residential rehabilitation loans, downpayment assistance, acquisition of covenant restrictions, and neighborhood improvement. Other

ADDI (American Dream Downpayment Initiative) is a new program authorized in 2003.

eligible activities include replacement housing, relocation, project management and program administration.

The other 80 percent of the tax increment revenue is used for public improvements and economic development activities to foster growth and remove blighting conditions in the project area.

# **ESG and HOME Match Requirements**

Federal match requirements apply to the City's HOME and ESG funds. The HOME program requires that for every HOME dollar spent, the City must provide a 25-percent match with non-federal dollars. HUD allows the City to use various resources to meet this match requirement. The HOME match obligation may be met with any of the following eligible sources:

- Cash or cash equivalents from a non-federal source;
- Value of donated land or real property;
- A percentage of the proceeds of single- or multi-family housing bonds issued by state, state instrumentality or local government;
- Value of donated materials, equipment, labor and professional services;
- Sweat equity

According to HOME program guidelines, no more than 25 percent of the City's match liability for any one year can be met through loans to housing projects, but amounts in excess of that may be banked as match credit for future years.

The ESG program requires that for each dollar of the City's ESG grant in any given year, the City must provide a 100 percent match with non-federal dollars. Garden Grove will continue to require its ESG partners to leverage non-federal funds and report their successes with each quarterly performance report. They may count the following as matching resources:

- Grants from other sources
- Salary paid to staff (not included in the award) to carry out the project of the recipient
- Time contributed by volunteers, valued at the rate of \$5 per hour
- The value of any donated material or building, or of any lease, calculated using a reasonable method to establish a fair market value.

Table 4-1 provides a summary of the major sources of funding available to the City for implementing housing and community development activities.

Table 4-1 Resources Available for Housing and Community Development Activities

Program Name	Description	Eligible Activities
Community Development Block Grant (CDBG)	Grants awarded to the City on a formula basis for housing and community development activities.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>Home Buyer Assistance</li> <li>Economic Development</li> <li>Homeless Assistance</li> <li>Public Services</li> <li>Public Improvements</li> <li>Rent Subsidies</li> </ul>
HOME Investment Partnerships Act (HOME)	A flexible grant program awarded to the City on a formula basis for expanding affordable housing opportunities.	<ul> <li>New Construction</li> <li>Acquisition</li> <li>Rehabilitation</li> <li>Home Buyer Assistance</li> <li>Rental Assistance</li> </ul>
American Dream Downpayment Initiative (ADDI)	Grants awarded to the City on a formula basis for expanding affordable homeownership opportunities for lower income households. The program is intended to increase the overall homeownership rate, especially among minority groups who have lower rates of homeownership compared to the national average.	<ul><li>Downpayment assistance</li><li>Closing costs</li></ul>
Emergency Shelter Grants (ESG)	Formula grants to provide homeless persons with basic shelter and essential supportive services.	<ul> <li>Rehabilitation or remodeling of a building uses as a shelter</li> <li>Shelter Operation and Maintenance</li> <li>Essential Supportive Services</li> <li>Homeless Prevention</li> </ul>
Garden Grove Redevelopment Agency	20 percent of the tax increment funds are set aside for affordable housing activities. The other 80 percent of the tax increment funds can be used for public and infrastructure improvements, as well as economic development activities to eliminate blighting conditions in the project area.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>New Construction</li> <li>Rental and Homeownership Assistance</li> <li>Housing services</li> <li>Economic Development</li> <li>Public/Infrastructure Improvements</li> </ul>
Section 8 Rental Assistance (Garden Grove Housing Authority)	Rental Assistance payments to owners of private market rate units on behalf of low income tenants.	Rental Assistance
Mortgage Credit Certificate (MCC)	Provides income tax credits to eligible first-time homebuyers for the purchase of new or existing housing. Local agencies (County) make certificates available.	Homebuyer assistance
Section 202	Grants to non-profit developers of supportive housing for the elderly.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>New Construction</li> <li>Rental Assistance</li> <li>Support Services</li> </ul>

Table 4-1 Resources Available for Housing and Community Development Activities

Program Name	Description	Eligible Activities
Section 811	Grants to non-profit developers of supportive housing for persons with disabilities, including group homes, independent living facilities and intermediate care facilities.	<ul> <li>Acquisition</li> <li>Rehabilitation</li> <li>New Construction</li> <li>Rental Assistance</li> </ul>
California Housing Finance Agency (CHFA) Multiple Rental Housing Programs.	Below market rate financing offered to builders and developers of multiple-family and elderly rental housing. Tax exempt bonds provide below-market mortgage money.	<ul> <li>New Construction</li> <li>Rehabilitation</li> <li>Acquisition of Properties from 20 to 150 units</li> </ul>
California Housing Finance Agency Home Mortgage Purchase Program	CHFA sells tax-exempt bonds to make below market loans to first time homebuyers. Program operates through participating lenders who originate loans for CHFA purchase.	Home Buyer Assistance
Low Income Housing Tax Credit (LIHTC)	Tax credits available to individuals and corporations that invest in low income rental housing. Tax credits sold to corporations and people with high tax liability, and proceeds are used to create housing.	<ul><li>New Construction</li><li>Rehabilitation</li><li>Acquisition</li></ul>
California Housing Rehabilitation Program - Owner Component (CHRP-O)	Low interest loans for the rehabilitation of substandard homes owned and occupied by lower-income households. City and non-profits sponsor housing rehabilitation projects.	<ul> <li>Rehabilitation</li> <li>Repair of Code Violations,         Accessibility Improvements,         Room Additions, General         Property Improvements     </li> </ul>
Federal National Mortgage Association (Fannie Mae)	<ul> <li>Loan applicants apply to participating lenders for the following programs:</li> <li>Fixed rate mortgages issued by private mortgage insurers.</li> <li>Mortgages which fund the purchase and rehabilitation of a home.</li> <li>Low Down-Payment Mortgages for Single-Family Homes in underserved low-income and minority communities.</li> </ul>	<ul> <li>Home Buyer Assistance</li> <li>Home Buyer Assistance</li> <li>Rehabilitation</li> <li>Home Buyer Assistance</li> </ul>

# 4.2 Priority Ranking

A priority ranking has been assigned to each category of housing and community development for purposes of using HUD Community Planning and Development (CPD) funds, based on the following HUD criteria:

- **High Priority:** Activities to address this need are expected to be funded with CPD funds during the five-year period.
- **Medium Priority:** If CPD funds are available, activities to address this need may be funded during the five-year period.
- Low Priority: The City will not directly fund activities using CPD funds to address this need during the five-year period. However, the City may support applications for public assistance by other entities if such assistance is found to be consistent with this Plan.
- No Such Need: The City finds there is no need for such activities or the need is already substantially addressed. The City will not support applications for public assistance by other entities for activities where no such need has been identified.

In establishing the five-year priorities, the City of Garden Grove has considered the following:

- 1) Community input;
- 2) Needs analysis by various public and service agencies;
- 3) Housing and community development needs assessment conducted as part of this Consolidated Plan;
- 4) Categories of low and moderate income households most in need of housing and community development assistance;
- 5) Activities that will best meet the needs of those identified households;
- 6) Limited availability of funding; and
- 7) Availability of non-CPD funds to address the needs.

# 4.3 Housing Priority Goals and Objectives

### Statement of Need

The City of Garden Grove is committed to affordable housing, investing in both housing development and rehabilitation and services to create and maintain affordable housing. However, there remains a large need for additional housing. Low and moderate income households continue to pay a large proportion of their income for housing. Specifically, compared to other income groups, a larger proportion of low and moderate income renter-households tend to experience housing cost burden (paying more than 30 percent of income) and other housing problems such as overcrowding and inadequate housing conditions. As presented in Chapter 3 of this Consolidated Plan, Housing and Community Needs Assessment, approximately 80 percent of all extremely low and low income households in the City experienced housing problems.

# 4.3.1 Housing Programs

The City of Garden Grove provides a number of housing programs that are administered with CDBG, ADDI and HOME funds. These programs are organized under the following five goals:

- 1) Increase and preserve the supply of affordable housing through acquisition and/or rehabilitation of residences
- 2) Increase the opportunities for low and moderate income households to participate in home ownership programs
- 3) Promote new construction of affordable housing
- 4) Provide rental assistance to extremely low and very low income renters to alleviate rental cost burden
- 5) Evaluate and reduce lead-based paint hazards

# Goal 1: Increase and Preserve the Supply of Affordable Housing through Acquisition and/or Rehabilitation of Residences

### High Priority

# 1A) Affordable Housing Acquisition

The City has traditionally been extremely active in increasing and preserving the supply of affordable housing through the acquisition and rehabilitation of properties. The City typically provides HOME funds for developers to acquire and/or rehabilitate multi-family rental properties. Redevelopment Set-Aside funds are typically used to rehabilitate single-family residences and can be used to leverage multi-family rehabilitation projects. In exchange, the developer will commit a portion of the units to be affordable to low or moderate income households for a minimum of 15 years (HOME funds) and up to 55 years (redevelopment set-aside funds). The City enters into these partnerships not only to preserve the supply of

affordable housing in the community, but also to stimulate high quality property management and neighborhood improvement.

Since FY 2000/01, the City has acquired and rehabilitated 213 rental units. Unfortunately per unit costs are rising rapidly throughout the region, and it has become increasingly difficult to meet HUD's per unit ceiling for HOME assistance.

Funding Source: Home and Redevelopment Set-Aside Funds

**Five-Year Quantified Objectives:** The City will utilize HOME and Redevelopment Set-Aside funds to acquire and rehabilitate 200 multi-family rental units (40 units per year).

**Income Levels:** 75 units will be affordable to extremely low income households, 100 will be affordable to low income households while 25 will be affordable to moderate income households.

# High Priority

# 1B) Housing Rehabilitation Assistance

Since the majority of the Garden Grove's housing stock was built during the 1950s, there remains an ongoing need for housing rehabilitation activities and assistance.

The City offers several housing rehabilitation programs including the Single Family Home Loan Rehabilitation Program and the Mobile Home Improvement Grant Program funded with Redevelopment Set-Aside funds and the CDBG-funded Senior Home Improvement Grant Program. This program provides grants of up to \$3,500 to senior home owners for accessibility improvements and minor home repairs.

Funding Source: CDBG funds

Five-Year Quantified Objectives: Provide 150 (30 per year) home improvement grants to senior home owners.

**Income Levels:** 75 low income seniors and 75 moderate income seniors.

# High Priority

# 1C) Maintain Housing Quality - Code Enforcement/Substandard Housing Abatement

In order to ensure that the housing stock is maintained and that all residents have access to decent and safe housing, the City has an active Substandard Building Code Abatement Team. The Team identifies hazards and responds to complaints, inspects units, identifies and communicates needed changes, makes referrals to the City's rehabilitation programs and other potential resources, and when necessary, works with the City Attorney to enforce housing codes in order to ensure healthy and safe housing conditions.

Utilizing CDBG funds, the Substandard Housing Code Abatement Team will target low and moderate income neighborhoods to improve housing safety and overall neighborhood property management in those areas.

# Funding Source: CDBG funds

Five-Year Quantified Objectives: The City will utilize CDBG funds to initiate abatement enforcements in at least 500 units (100 per year) and achieve abatement in at least 300 units (60 per year) within low and moderate income neighborhoods. The inspectors will also continue to recruit property owners for the City's various rehabilitation grant and loan programs to explore financing assistance to improve low and moderate income housing.

# Goal 2: Increase the Opportunities for Low and Moderate Income Households to Participate in Home Ownership Programs

### High Priority

# 2A) First Time Homebuyer Program

As the City and the region become increasingly built-out, land availability has decreased and the cost of land has risen significantly over the past few years. This trend has severely impacted housing affordability within Orange County. According to the California Association of Realtors, the median home price in Garden Grove in 2004 was \$440,000. At this price, housing is out of reach for virtually all low and moderate income Garden Grove residents.

Reflecting the City's extremely competitive and expensive housing market, providing homebuyer assistance has been challenging for the City. Garden Grove currently assists households through the *Coming Home to Garden Grove* program which provides a silent second mortgage of up to \$10,000. This program is supported with Redevelopment Set-Aside funds.

For HUD-funded homebuyer assistance, the City anticipates using American Dream Downpayment Initiative (ADDI) funds to encourage homeownership. Following income guidelines for the ADDI, the City will attempt to layer ADDI grants with the *Coming Home to* 

Garden Grove Program, in the hopes that deeper assistance will allow low income prospective homebuyers to be successful in finding a home and qualifying for the mortgage.

The City will first promote first time homebuyer assistance to residents and tenants of low income housing, including public and manufactured housing. The City will cooperate with the Housing Authority's Family Self-Sufficiency Program (FSS) to invite applications from low income candidates who have been saving for a goal of homeownership.

Funding Source: ADDI and Redevelopment Set-Aside funds

**Five-Year Quantified Objectives:** The City anticipates assisting 25 households (5 per year) using ADDI and Set-Aside Funds

Income Levels: 12 low income residents and 13 moderate income residents

# Goal 3: Promote New Construction of Affordable Housing

High Priority

# 3A) Affordable Housing Construction

To help address to shortage of new affordable housing in the community, the City will promote and facilitate new construction of affordable housing. This will primarily be achieved through the investment of Redevelopment Set-Aside funds and redevelopment inclusionary housing requirements. Anticipated projects include Sycamore Walk, Brookhurst Triangle, the Taft Triangle and the Garden Grove Senior development.<sup>2</sup> A description and status of these projects as of March 2005 are provided below:

- Sycamore Walk: The second phase for the *Sycamore Walk* project is currently in the pipeline; however, the site is contaminated. The City is currently working with the Olson Company to clean up the site. It is estimated that the clean-up will take approximately three to four years. It is estimated that 5 low and moderate income ownership units will be created with this project.
- **Brookhurst Triangle:** Brookhurst Triangle is a 16-acre, mixed-use project that would be made up of approximately 80,000 square feet of retail and approximately 510 ownership units, at least 15 percent of those (76) would be affordable to low and moderate income households. This project should be constructed within the next five years.
- Taft Triangle: The Taft Triangle is another mixed use project that will include approximately 200 new ownership units. It is estimated that the 30 units will be affordable to low and moderate income households.

Kim Huy, Neighborhood Improvement Manager, March 2005.

• Garden Grove Senior Community: META Housing has proposed a tax credit project - the Garden Grove Senior Community. This proposed project is a 85-unit senior housing apartment project; all 85 units would be restricted for rent to low income households (below 60 percent MFI). This project is anticipated to be built within the next five years.

To alleviate the housing shortage, the City has also introduced several measures to remove barriers to affordable housing. In mid-2003, the City Council approved a code amendment to allow "granny flat" (second units) construction on single-family lots. Homeowners who meet City standards will no longer have to go through a public hearing with the Planning Commission and secure City Council approval. In addition, the City provides a density bonus pursuant to State law for developers as an incentive to create additional affordable housing.

Funding Source: Redevelopment Set-Aside funds and Tax Credit financing

Five-Year Quantified Objectives: Since many of the proposed projects discussed earlier are at the preliminary stages and can change to unforeseen variables, the City conservatively estimates in assisting in the production 125 new housing units affordable to moderate and lower income households.

- Sycamore Walk (5 units)
- Brookhurst Triangle (76 units)
- Taft Triangle (30 units)
- Garden Grove Senior. Community, LP (85 units)

# Goal 4: Provide Rental Assistance to Extremely Low and Low Income Renters to Alleviate Rental Cost Burden

# High Priority

# 4A) Section 8 Voucher Program

The provision of rental assistance is extremely important because many low income (up to 50 percent MFI) families with a housing cost burden are threatened with homelessness. In an effort to meet the strong demand for rental assistance within Garden Grove, the Housing Authority has made a strong effort to apply for any and all available funding.

In 2004, the Garden Grove Housing Authority provided Section 8 rental assistance to 2,338 households, including 2,234 households that received Housing Choice Vouchers and 104 households assisted through the Moderate Rehabilitation Program. The Authority maintains 100 percent lease up of vouchers to maximize access, anticipating turnover so that new vouchers can be issued promptly to those on its Section 8 waiting list. As of March 2005, there were 5,045 households on the waiting list. Approximately 64 percent of these were family households with children and 25 percent were elderly households.

The Garden Grove Housing Authority has also implemented a Family Self-Sufficiency program designed to assist families in reducing their dependence on HUD's rental assistance programs and other government subsidies such as welfare.

Funding Source: HUD Section 8 Voucher Funds

Five-Year Quantified Objectives: The Housing Authority will continue to market the Section 8 program to eligible households and provide 2,338 low and extremely low income households with Section 8 Rental Assistance. The Housing Authority will also pursue opportunities to increase the number of Section 8 subsides and other resources within the city.

Income Levels: Extremely low and low income households

### Goal 5: Evaluate and Reduce Lead-Based Paint Hazards

Citywide, an estimated 6,038 units occupied by low and moderate income households (0-80 percent MFI) may contain lead-based paint (LBP). Specifically, approximately 599 units were occupied by extremely low income households, 1,137 units were occupied by low income households, and 4,302 units were occupied by moderate income households may contain LBP. The hazard of lead-poisoning is real; between 1999 and 2003, the Orange County Health Care Agency reported over 1,300 incidences of high blood lead levels and 191 official cased of elevated blood lead levels among children under the age of 16. Of these cases, 12 occurred in Garden Grove.

### High Priority

# 5A) Lead Based Paint Abatement Program

The City has an aggressive policy to identify and address lead-based paint hazards in all HUD-funded housing rehabilitation projects. Although HUD does not require such measures unless there are young children present, the City requires lead paint testing for all proposed HUD-funded housing rehabilitation projects in Garden Grove where broken and dusty paint surfaces are observed, or where the proposed work will disturb painted surfaces. In 2004, 57 properties were tested for lead based paint as part of the City's *Senior Home Improvement Program*. Of these properties, 20 homes were detected to have some form of lead-based paint hazards.

Unfortunately, the costs of containing lead dust during rehabilitation activities, if lead based-paint is found, can be prohibitively expensive for low income households because special contracting licenses and interim control procedures are required. For that reason, the City recently added CDBG funds to the annual budget to assist with the cost of lead-based paint testing and interim controls if lead paint is found.

Funding Source: CDBG funds

Five-Year Quantified Objectives: Continue to test for and control lead-based paint hazards in all rehabilitation projects that will disturb paint. It is estimated that 150 (30 per year) homes will be tested for lead based paint as part of the Senior Home Improvement Grant program.

**Income Levels:** 75 low income households and 75 moderate income households

Table 4-2
Five-Year Housing Needs and Priorities Funded with CDBG, ADDI, HOME Funded Programs

Priority Housing Needs		Income	Priority Need Level	Unmet Need	Goals
		0-30%	High	1,705	18
	Small Related	31-50%	High	1,740	25
		51-80%	High	1,424	6
		0-30%	High	1,180	19
	Large Related	31-50%	High	1,390	25
Renter		51-80%	High	1,379	6
Keillei		0-30%	High	664	19
	Elderly	31-50%	High	360	25
		51-80%	High	144	7
		0-30%	High	420	19
	All Other	31-50%	High	348	25
		51-80%	High	354	6
Owner		0-30%	High	1,355	0
		31-50%	High	1,674	87
		51-80%	High	3,230	88
Special Populations					75
Total Goals					375
Section 215 Renter Goals					200
Section 215 Owner Goals					175

#### Notes:

- 1. Unmet needs are based on 2003 HUD CHAS data for households with housing problems by household income and type.
- 2. A small related household is defined by HUD as a household of 2 to 4 persons, which includes at least one person related to the householder by birth, marriage, or adoption. A large related household is a household of 5 or more persons, which includes at least one person, related to the householder by blood, marriage or adoption.
- 3. Housing goals include anticipated accomplishments under the following programs: homeownership assistance programs; owner-occupied rehabilitation programs; renter-occupied rehabilitation programs.
- 4. Section 215 Goals are affordable housing that fulfill the criteria of Section 215 of the National Affordable Housing Act. For rental housing, a Section 215 unit occupied by a low income household and bears a rent that is less than the Fair Market Rent or 30% of the adjusted gross income of a household whose income does not exceed 65% of the AMI. For an owner unit assisted with homebuyer assistance, the purchase value cannot exceed HUD limit. For an ownership unit assisted with rehabilitation, the mortgage amount cannot exceed HUD limit.

# 4.3.2 Programs to Meet Homeless Needs

# Goal 6: Address the Needs of Homeless Individuals and those At-risk of Homelessness

# High Priority

# 6A) Continuum of Care for the Homeless

Since 1998, the County of Orange has implemented a community-based system of care that is consistent with HUD's belief that the best approach to alleviating homelessness is through a local-based comprehensive and coordinated approach; this comprehensive and coordinated housing and service delivery system is known as a Continuum of Care (CoC).

The CoC system serves the needs of the homeless through a mix of diverse housing/service providers that include nonprofit organizations (faith-based and community-based), federal, state, and local governmental agencies, public housing authorities, local businesses, schools and universities, law enforcement, private donors, and homeless/formerly homeless persons. Through these partnerships Orange County is able to garner the resources and fill gaps in the system of care for the region's homeless and those at risk of homelessness. The County of Orange Housing and Community Services (HCS) Department is the lead agency for the Orange County Continuum of Care.

The 2004 Orange County Continuum of Care application to HUD for supportive housing funds estimated 35,000 homeless people in Orange County. Specifically, seven percent of these homeless persons are families with children. Chronically homeless persons make up 22 percent of the homeless population, 20 percent are victims of domestic violence, 18 percent are chronic substance abusers, six percent are mentally ill, another six percent are living with HIV/AIDS, and two percent are either veterans or emancipated youths.

On January 27, 2005, the Orange County HCS coordinated a countywide count of the homeless. The City of Garden Grove Police Department participated in this effort and estimated about 400 homeless persons in the City, including 350 sheltered homeless in trailers. Those in trailers are mostly families with children, while those identified at street locations and public parks are primarily the chronically homeless and mostly men.

Based on the homeless profile developed by the County of Orange and the capacity of facilities/services offered, the unmet need was determined. The Continuum of Care gap analysis was presented as Table 3-20 in Chapter 3, Housing and Community Development Needs, of this Consolidated Plan.

The City of Garden Grove recognizes that homelessness is a regional problem and will continue to address homeless needs through its ESG funds. For many years the City has supported several homeless service providers in the community that provide homeless prevention, supportive services, and emergency and transitional shelter. These agencies include

the Dayle McIntosh Center for the Disabled, the Women's Transitional Living Center (WTLC), and the Thomas House Temporary Shelter.

The City also mobilizes its Section 8 Housing Choice Voucher program, to the extent possible, to address the needs of homeless individuals and families. During 2003-04, the Garden Grove Housing Authority executed Memorandums of Understanding with Thomas House, Dayle McIntosh, and Shelter for the Homeless. The Authority agreed to give homeless families referred by these social service and emergency/transitional shelter programs preference for Section 8 vouchers to assist in transition to stable and permanent housing. Homeless persons/families with AIDS are referred by the Orange County AIDS Coordinator to Dayle McIntosh, which in turn reserves priority for these persons/households for rental assistance through the Garden Grove Housing Authority.

The City will continue to participate in the Orange County Continuum of Care Council. The City provides data for the Council's surveys, attends meetings, and relies heavily upon the Continuum's research and discussions to identify and address critical gaps in local continuum of care for the homeless.

Funding Source: ESG funds and HUD Section 8 Voucher Funds

Five-Year Quantified Objectives: Provide emergency/transitional housing or homeless prevention services to 1,250 individuals (250 per year). Of these 1,250 individuals, approximately 150 will be persons with disabilities. Each year providers and programs may change due to the Request for Proposals process.

The Garden Grove Housing Authority will also continue provide rental assistance through its Section 8 Voucher Program to extremely low and low individuals/households (see *Program 4A*).

**Income Levels:** 1,250 extremely income homeless or at-risk clients (250 per year).

# 4.3.3 Fair Housing Strategy

# Goal 7: Continue to Implement Fair Housing Laws by Providing Funding to Further Fair Housing

The City enforces the State and federal fair housing laws within its jurisdiction. To achieve fair housing goals, the City has contracted with the Fair Housing Council of Orange County (FHCOC) to provide fair housing services. Founded in 1965, FHCOC works with tenants, landlord, and community groups to provide community education, individual counseling, mediation, and advocacy to eliminate housing discrimination.

The City of Garden Grove collaborated with other Orange County municipalities, the County of Orange, and the FHCOC to develop and complete a comprehensive Regional Analysis of Impediments to Fair Housing Choice (AI) in 2000. The regional AI describes a range of potential regional impediments to fair housing, including:

- Discriminatory lending practices;
- A lack of fair housing education for employees who may cause fair housing concerns (e.g. apartment managers, public agency staff);
- A lack of adequate information regarding housing rights for recent immigrants; and
- A discrepancy among local entitlement jurisdictions that have independent policies affecting housing development.

# High Priority

# 7A) Fair Housing Services

Currently, the Fair Housing Council of Orange County provides a full menu of fair housing services including fair housing education, counseling, enforcement, and landlord/tenant dispute resolution to Garden Grove residents. The City will continue to contract with a fair housing service provider to provide fair housing services to residents.

Funding Sources: CDBG funds

Five-Year Objectives: Serve 3,500 (700 persons per year) with general housing issues and/or fair housing issues.

# 4.4 Community Development Goals and Objectives

### Statement of Need

Based on community input, interviews with staff and service providers, and the needs assessment presented in Chapter 3, Housing and Community Development Needs, the City has established the five-year priorities for expending CDBG and ESG funds on community development programs and activities. These priorities are presented in Table 4-3. The estimated funding presented in Table 4-3 are general estimates only. By no means would the City guarantee funding according to this table.

Table 4-3
Five-Year Community Development Needs and Priorities

Priority Community Development Needs	Priority Needs Level	Goals	Estimated CP Dollars to Address
Public Facility Needs			
ADA/Architectural Barrier Removal	Medium		
Senior Centers	Medium		
Handicapped Centers	Low		
Homeless Facilities	Medium		
Youth Centers	Medium		
Child Care Centers	Medium		
Health Facilities	Low		
Neighborhood Facilities/Libraries	Medium		
Parks and/or Recreation Facilities	Medium		
Parking Facilities	Low		
Non-Residential Historic Preservation	Low		
Other Public Facility Needs	Medium		
Infrastructure Needs			
Water/Sewer Improvements	High	Multiple projects	
Street Improvements	High	Ongoing Improvements	
Sidewalks	High	Ongoing Improvements	\$1,493,600 CDBG funds
Solid Waste Disposals Improvements	Medium		
Flood Drain Improvements	Medium		
Other Infrastructure Needs	Low		

Table 4-3 Five-Year Community Development Needs and Priorities

Division is D. I. and I.	Priority	6.1	Estimated CP
Priority Community Development Needs  Public Service Needs	Needs Level	Goals	Dollars to Address
Senior Services	High	1,000 seniors	
Handicapped Services	High	150 disabled individuals served through homeless services	
Youth Services	Medium		
Child Care Services	Medium		
Transportation Services	Medium		\$2,240,400 CDBG
Substance Abuse Services	Medium		funds
Homeless Services	High	1,250 homeless or at risk individuals	\$549,000 ESG funds
Employment Training	Medium		
Health Services	Low		
Lead-Hazard Screening	High	150 units	
Crime Awareness	High	2,000 people	
Other Public Service Needs	Medium		
Fair Housing	High	3,500 persons	
Graffiti Removal	High	800 properties	
Code Enforcement	High	500 housing units	\$1,045,000 CDBG funds
Economic Development			
ED Assistance to For Profit	Medium		
ED Technical Assistance	Medium		
Micro-Enterprise Assistance	Medium	250 marriala	Section 108 loan
Rehab; Public/Privately-Owned Com'l/Industrial	High	250 new jobs	Section 108 Ioan
CI Infrastructure Development	Medium		
Other Commercial/Industrial Improvements	Medium		
Planning and Administration	High	N/A	\$3,600,500 in ESG, CDBG, ADDI and HOME funds

# Goal 8: Preserve and Improve Existing Public Services for Special Needs Populations

Public assistance is typically required to deliver community and supportive services for low and moderate income households and persons with special needs. These populations tend to have less income at their disposal, may be unaware of services responding to their special circumstances, and may have difficulty with enrollment or eligibility procedures.

The City will continue to use ESG, CDBG, ADDI, HOME, and Section 8 funds to address housing and service needs for special needs households. The City will continue to assist disabled/senior residents through the *Senior Home Improvement Grant Program* (see objectives for *Program 1B*).

In addition, Garden Grove Housing Authority will continue to make a special effort to help the disabled and seniors to obtain and maintain Section 8 voucher assistance (see objectives for *Program 4A*).

# High Priority

### 8A) Senior Services

Providing housing and supportive services for senior households is an important need within Garden Grove. According to the Census, the proportion of senior residents is increasing in the City. In 2000, approximately ten percent of all residents were 65 years and older, an increase from eight percent in 1990. In addition, the proportion of "baby boom" adults aged 45 to 64 accounted for almost 20 percent of all residents in 2000, suggesting that the share of seniors in the community will continue to increase over the next decade.

The City funds and operates the H. Lake Senior Center, which provides a range of supportive services and activities. Garden Grove will continue to support the needs of senior residents by continuing to provide services to senior residents, either by supporting programs operated by the H. Lake Senior Center or other independent agencies that serve the needs of senior and disabled residents, such as transportation services or meals delivery program.

Funding Source: CDBG Funds

Five-Year Quantified Objectives: Assist approximately 1,000 senior residents (200 per year).

**Income Levels**: 1,000 low and moderate income residents.

# Medium Priority

# 8B) Youth and Family Services

The City of Garden Grove recognizes the importance of providing activities and services for youth and families in the community. Potential youth services include diversion, education, and outreach activities to divert gang activities and improve educational opportunities for low income residents. Family services can include low cost child care, education, and recreational opportunities.

Youth and family service centers in Garden Grove include the City-operated Buena-Clinton Family Resource Center. The Center provides after school tutoring, youth leadership programs, parenting classes, recreational activities and health fairs. An additional resource in the community is the federally-funded Youth Café which provides resources for leadership and job search skills.

Funding Source: CDBG Funds

Five-Year Quantified Objectives: As funding levels permit, the City will support family service programs provided by local agencies or community centers such as childcare, educational, and recreational programs.

**Income Levels**: Low and moderate income residents.

# High Priority

# 8C) Graffiti Abatement

Graffiti removal and crime reduction in low and moderate income areas are high priority needs in Garden Grove. Approximately 2,500 graffiti occurrences are abated every year within the City, including 160 incidences on private properties within income-eligible areas. The City's Graffiti Abatement Team works to remove graffiti within a short time and any significant activity is also reported to the Gang Suppression Unit. The Graffiti Abatement Team holds several volunteer "paint outs" every month and has collaborated with other agencies such as the Buena-Clinton Family Resource Center to hold graffiti "paint-outs" with youth volunteers.

Funding Source: CDBG Funds

Five-Year Quantified Objectives: Within five years, the City will conduct 800 CDBG-funded graffiti clean-ups (160 per year) on private properties within low and moderate income areas.

Income Levels: Low and moderate income residents.

## High Priority

# 8D) Neighborhood Safety - Gang and Crime Suppression

Reducing crime and enhancing neighborhood safety are ongoing community goals. In the past, Garden Grove has provided CDBG funds to support gang and crime suppression efforts as well and improve student and pedestrian safety.

The Police Special Investigation Gang Suppression Unit aims to improve neighborhoods by enhancing safety and security. Partially supported with CDBG funds, the Gang Suppression Unit improves safety in low and moderate income areas through a combination of school truancy reduction, gang intervention, outreach, and education activities, as well as arrests and probation checks on released gang offenders.

Funding Source: CDBG Funds

Five-Year Quantified Objectives: The Police Special Investigation Gang Suppression Unit will conduct gang violence prevention, gang probation checks, counseling referrals, and youth truancy intervention. These activities will enhance the safety of 10,000 people (2,000 per year)in low and moderate income neighborhoods.

**Income Levels**: Low and moderate income residents.

# Goal 9: Improve Neighborhoods through Public Facility and Infrastructure Improvements

Infrastructure improvements are CDBG-eligible activities within income-eligible areas. As an older community, much of Garden Grove's roads and sewer and water infrastructure were originally constructed during the 1960s and 1970s. Due to its age, much of this infrastructure is in need of replacement or reconstruction. As shown in Figure 3-7, a large portion of the community is within income eligible low/moderate income areas.

# High Priority

# 9A) Infrastructure Improvements

Much of the Garden Grove's existing sewer system is over 30 years old and was not designed to meet the demands of the City's current population. The City has identified the upgrading and improvement of the existing sewer system as an important need. Other infrastructure needs include storm drain and streetscape improvements and repairs.

Funding Source: CDBG Funds

**Five-Year Quantified Objectives:** Within five years, the City will provide upgrades and improvements to the City's sewer system in income-eligible areas.

**Income Levels**: Low and moderate income residents.

### Medium Priority

# 9B) Neighborhood Park and Playground Improvements

As funding is available, the City will provide funds to support improvements to parks and playgrounds in low and moderate income areas. Improvements will include trash clean-up, safety improvements, visual enhancements, and the improvement of playground amenities and landscaping features.

Funding Source: CDBG Funds

**Five-Year Quantified Objectives:** If funding permits, the City will provide park and playground improvements within income eligible areas.

Income Levels: Low and moderate income residents.

# High Priority

# 9C) Safe Routes to School Program

The City will continue to support the Safe Routes to School Project. This program increases students' and other pedestrians' safety along walking routes to 12 Garden Grove schools. Funds are primarily used to provide pedestrian-activated signals at intersections near elementary, intermediate and high schools within low and moderate income areas.

**Funding Source:** CDBG Funds

Five-Year Quantified Objectives: The City will continue with providing pedestrian safety improvements near Garden Grove schools. (Information on the total number of people served through this program is pending and will be included in the final draft).

Income Levels: Low and moderate income residents and youth

# Goal 10: Promote Economic Development and Promote Greater Employment Opportunities

Economic development support is a key area of City activity. For several years, the City has focused economic development efforts within the Harbor Boulevard corridor. The area has suffered from high crime rates, declining tax revenues, diminished retailer interest and elevated vacancy rates. A number of key retail spaces have been unoccupied for years, spawning a decline in surrounding businesses.

### High Priority

# 10A) Economic Development

In August of 1993, the City participated in a Regional/Urban Design Assistance Team design and planning study. The study provided a long-range plan to develop Harbor Boulevard into a resort district to capitalize on opportunities stemming from the nearby Disney Resort and Anaheim Convention Center expansions.

In 1996, the City secured a \$13.5 million loan through HUD's Section 108 program to facilitate the development of the second phase of the Harbor Corridor Resort Project. The loan, to be repaid annually through a portion of the City's annual CDBG entitlement grants, helped the City leverage other funds for land acquisition to develop three hotels and three restaurants, which collectively have created an estimated 1,200 jobs.

The City will continue to access the approved loan for the acquisition of properties along Harbor Boulevard to foster economic and employment opportunities for low and moderate income residents.

Funding Source: Section 108 loan

**Five-Year Quantified Objectives:** Facilitate economic development projects that will generate a net increase of at least 250 full-time equivalent jobs (50 jobs per year).

**Income Levels**: Low and moderate income residents.

# Goal 11: Provide for Necessary Planning and Administration Activities to Address Housing and Community Development Needs in the City

High Priority

# 11A) Planning and Administration

Up to 20 percent of the CDBG and 10 percent of the HOME/ADDI, and 5 percent of ESG funds can be used to support the general administration of these programs. To ensure effective use of limited federal funds, the City needs to better understand its housing and community development needs. Preparation of the annual updates allows the City to address the community's changing needs. Continued outreach to low and moderate income households should be conducted as part of the citizen participation process for the CDBG, HOME, ADDI, and ESG programs. City staff should keep abreast of current program requirements and future program development through attending training and meetings with related agencies.

Funding Source: CDBG, HOME, ADDI, and ESG Funds

**Five-Year Quantified Objectives:** Continue to implement the housing and community development programs and comply with and planning and reporting requirements of CDBG, HOME, ADDI, and ESG regulations.

Review the implementation of the Consolidated Plan programs and objectives and update the Action Plan annually.

# 4.5 Summary of Five-Year Objectives

Table 4-4 and 4-5 summarizes the quantified five-year objectives the City intends to pursue to benefit the homeless and special needs populations. Table 4-6 summarizes the City's quantified five-year housing and community development objectives.

Current and past funding levels for services and facility improvements, as well as funding needs identified by the City are used as gross estimates for the funding needed for the next five years. The unit of assistance, depending on the nature of the program, may represent a household, a housing unit, a person, an organization, or an agency. The assistance objectives are based on the assumption that consistent levels of funding will be available. Should

funding levels be reduced in the future, the ability of the City to meet these objectives may be compromised.

Table 4-4 Unmet Needs and Goals for Special Needs Populations

Special Needs Subpopulations	Priority Need Level High, Medium, Low, No Such Need	Unmet Need	Dollars To Address Unmet Need	Goals
Elderly/Frail Elderly <sup>4</sup>	High	2,622²	\$1,200,000 CDBG (\$525,000 through Senior Home Improvement Program and approximately \$700,000 through senior services)	Assist 1,150 senior households
Severe Mental Illness	Low		\$260,000 -CDBG	Assist 75
Developmentally Disabled	Low		(\$260,000 through Senior Home Improvement Program)	disabled households and 150 homeless/ at-risk disabled individuals
Physically Disabled	High	33,162 <sup>3</sup>	A portion of \$520,000 ESG funds will support disabled and homeless individuals	
Persons w/ Alcohol/Other Drug Addictions	Low	17,353	_	_
Persons w/HIV/AIDS	Low	178	_	_
Homeless	High	400¹	\$520,000 ESG	Supportive Services for 1,250 homeless and at-risk individuals

<sup>1)</sup> Notes: Estimate provided by Garden Grove Police Department.

<sup>2)</sup> Number of seniors with housing problems according to CHAS data by HUD.

<sup>3)</sup> A person can have multiple disabilities. The Census indicates approximately 33,162 persons with disabilities in the City of Garden Grove.

<sup>4)</sup> At-risk homeless individuals and senior households will also be assisted Section 8 Administrative Funds. (Section 8 Security Deposit Assistance Program).

Table 4-5 Summary of Specific Homeless/Special Needs Objectives

Obj #	Specific Objectives	Performance Measure	Expected Units	Quantified Outcomes
Program	Homeless Objectives			
6A	Provide funding for non-profit agencies that provide emergency/transitional housing assistance and supportive services	persons	1,250 homeless/at-risk persons received services or shelter	Prevent 1,250 persons from becoming homeless
	Provide funding for non-profit agencies that provide emergency/transitional housing assistance and supportive services for disabled residents.	persons	250 homeless/at- risk persons received shelter or services	Prevent 250 disabled persons from becoming homeless
Special Ne	eds Objectives			
Program 1B	Elderly: Provide assistance through the Senior Home Improvement Grant Program	Housing units	150 housing units (approximately 30 per year)	Assist 4 percent of the 3,263 extremely low, low and
	Physically Disabled: Provide assistance through the Senior Home Improvement Grant Program.	Housing units		moderate income Garden Grove senior owner- households

Table 4-6 Summary of Specific Housing/Community Development Objectives

Obj #	Specific Objectives	Performance Measure	Expected Units	Quantified Outcomes		
	Rental Housing Objectives					
Program 1A	Provide rehabilitation through the acquisition/rehabilitation of rental properties	Housing Units	200	Rehabilitate 200 older units, representing 1.3 percent of the 15,000 older rental units in the City		
	Owner Housing Objectives					
Program 1B	Provide home improvement grants to 150 seniors	Households	150	Rehabilitate 150 older units, representing 6 percent of the 2,344 low and moderate income senior homeowners		
Program 2A	Provide first time homebuyer assistance to 25 low and moderate income households	Households	25	Assist 25 first time homebuyers, representing 0.3 percent of the 6,837 low and moderate income family renterhouseholds in the City		
Program 5A	Provide lead based paint information and testing to all applicants seeking rehabilitation assistance through the Senior Home Improvement Grant Program	Housing Units	150	Decrease the number of the estimated 6,038 housing units with lead-based paint by 2 percent		
	Infrastructure and Public Facilities Objective	es				
Program 9A	Provide sewer improvements within income eligible areas.	Projects	Various Projects			
Program 9C	Provide pedestrian safety improvements near Garden Grove schools	Projects	Various Projects	Reduce accident rates at intersections		
	Public Services Objectives					
Program 7A	Provide funding to a fair housing service provider to provide fair housing education, counseling, enforcement, and landlord/tenant dispute resolution for Garden Grove residents.	Persons	3,500	Resolution of 85 percent of landlord/tenant service requests		

Table 4-6 Summary of Specific Housing/Community Development Objectives

Obj #	Specific Objectives	Performance Measure	Expected Units	Quantified Outcomes	
Program 8A	Provide supportive services for senior residents.	Persons	1,000	Assist 1,000 seniors, representing 6 percent of the 15,765 senior residents in Garden Grove	
Program 8C	Provide 800 graffiti clean ups on private property within low and moderate income areas.	800 private property sites	800 clean-ups	-	
Program 8D	Reduce gang, drug, and illegal activity at within low and moderate income areas.	Persons	2,000	Enhance safety of 2,000 residents	
	Economic Development Objectives				
Program 10A	Facilitate economic development projects that will provide new jobs for low and moderate income residents.	Jobs	250 jobs	Create 250 new jobs	
	Other				
Program 1C	Provide code enforcement activities within low and moderate income neighborhoods.	Housing units	500	Achieve abatement in 60 percent (300 units) of the 500 units	

# 4.6 Anti-Poverty Strategy

Poverty is defined by the Social Security Administration as the minimum income an individual must have to survive at a particular point in time. Although there are many causes of poverty, some of the more pronounced causes of poverty include the following:

- Low income-earning capability
- Low educational attainments and job skills
- Discrimination
- Personal limitations (e.g. developmental and physical disabilities, mental illness, drug/alcohol dependency, etc.)

Although many consider Orange County to be a very affluent area, there are also many families living in poverty. Persons living below the poverty level are facing tremendous challenges in high-income areas such as Orange County, where housing costs are significantly high than the national and regional average. According to the 2000 Census, approximately 10 percent of all Garden Grove families (3,858 families) were living below the poverty level.

Garden Grove continues to look for ways to expand economic activities to include all people and provide programs to those people who are less fortunate. The City has focused on the creation of jobs for low and moderate income persons through the economic development in the Harbor Boulevard area. This program will create and retain permanent jobs that are available to and/or filled by low and moderate income people. In addition, other essential elements of the City's anti-poverty strategy include:

- Section 8 Rental Assistance
- Section 8 Family Self-Sufficiency Program
- Economic Development programs
- Family Resource Centers
- Anti-Crime programs
- Housing Rehabilitation programs
- Creation of Affordable Housing
- Transitional housing and homeless service programs

Through these programs the City is working to reduce the number of families living below the poverty line.

# 4.7 Institutional Structure and Coordination

Although the City's HUD-funded activities and strategies have very successfully addressed the City's housing, homelessness, neighborhood improvement, and public service priority needs, the City's grant administration, compliance, and monitoring have needed improvement in recent years. Insufficient staff capacity has been a significant constraint. Vacancies in the Community Development Department had impacted the City's ability to implement the Consolidated Plan at full charge.

Recently, the City made changes to its staff assignments in order to address the administrative, planning, and reporting needs of these CPD funds. Project management improvements include strengthened project eligibility review and regulatory compliance staff training and procedures. The City also amended the Citizen Participation Plan to make it more readable and to officially designate the City Council as the public hearing body, and worked closely with the Neighborhood Improvement and Conservation Commission to deepen their understanding of these HUD programs.

For 2005-2010, the City's goals include strengthening project designs through negotiating stronger and more specific performance goals for project contracts. This includes ongoing education and technical assistance for program stakeholders including fellow City Departments implementing HUD-funded programs, outside contractors, the Neighborhood Improvement and Conservation Commission, the City Council, and the public in general regarding the overall objectives and eligible and ineligible uses of each of our HUD funds.

Ongoing capacity-building is another priority for 2005-2010. In addition to in-house training and development of improved management systems, the City will continue to participate in all HUD training offered locally. To gather more information, build staff knowledge, and seek regional solutions to regional problems, the City recently renewed involvement in the Orange County Lead-Based Paint Collaborative and Orange County Continuum of Care for the Homeless Council.

The Neighborhood Improvement and Conservation Commission (NICC) helps articulate community priorities through a needs hearing held each year and to assess HUD funding allocations through the annual Action Plan review. The NICC is building its capacity to help guide these programs through better knowledge of programs. As part of the needs hearing leading to this 2005-2010 Consolidated Plan update, the NICC was invited to a community workshop held on February 16, 2005.

# 4.8 Monitoring

To ensure that HUD funds are used effectively and appropriately, the City will continue to conduct an intensive monitoring program of all funded projects, be they performed by fellow City Departments or by outside contractors. Monitoring will include both meticulous review of funding applications, careful design of performance goals and contracts, analysis of quarterly or semiannual performance reports or audits, and a two-stage approval process for reimbursement requests.

The purpose of the City's monitoring procedures is to consistently evaluate the following areas:

- **Performance Management:** Ensure that grantees and recipients are conducting their program in accordance with a agreed upon performance goals in the contract, utilizing funds only for eligible activities, and establishing that the clients are eligible for the applicable HUD-funded program (i.e., they meet income guidelines).
- Financial Management: Ensure that grantees and recipients are appropriately following financial management requirements. The City's contract manager will carefully review requests for reimbursement to make sure that costs are eligible, properly classified, and procured according to procedures and spending limits established by federal regulation and the contract budget. In addition, the City will evaluate contractor's annual audits to ensure compliance with applicable federal Office of Management and Budget standards.
- Other Administrative Management: Ensure that work is implemented in compliance
  with federal environmental and labor regulations as well as policies regarding conflict
  of interest and prohibitions on political activity.

Full site monitoring is extremely time-intensive. In the past, the City has worked with an outside consulting firm to help the City complete a particularly comprehensive round of HOME project monitoring. In 2003-04 the City completed full site monitoring of all outside ESG and CDBG subcontracts, as well as program performance monitoring and technical assistance for almost all fellow City Departments conducting CDBG-funded programs.

In 2004/05 the decision was made to move to a biannual monitoring cycle based on particular projects and several risk factors. They include the size and complexity of the project, the amount of HUD and other City funding invested, whether the City intends to fund the contractor again (for example, to continue services), whether the contractor is still under obligation for contract requirements (for example, to fulfill housing affordability covenants over a 15-year or longer period), and HUD guidelines (for example, on the required minimum frequency for monitoring of HOME projects based upon the number of units in the project).