



**Community Development Block Grant (CDBG) &  
HOME Investment Partnerships Program**

**DRAFT**

**ANNUAL ACTION PLAN**

**PROGRAM YEAR 2022-2023**

(July 1, 2022 through June 30, 2023)

*Public Review Period*

*March 21, 2022 – April 21, 2022*

**Community Development Department  
Housing & Neighborhood Development**

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# Executive Summary

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

### 1. Introduction

The Fiscal Year (FY) 2022/23 Annual Action Plan (AAP) represents the third year of the City's Consolidated Plan for the Fiscal Years 2020 - 2025 (Con Plan) as adopted by the City Council and approved by HUD. The AAP is the City of Norwalk's application for United States Department of Housing and Urban Development (HUD) entitlement grants and identifies the proposed programs and projects to be funded during the City's FY 2022/23. There are two HUD entitlement grants that are covered in the AAP:

- Community Development Block Grant (CDBG): The primary objective of the CDBG program is the development of viable urban communities through the provision of improved living environments, expansion of economic opportunity and decent housing. Funds are intended to serve low- and moderate-income residents and areas.
- HOME Investment Partnerships Program (HOME): The HOME program is dedicated to increasing the availability as well as the access to affordable housing for low-income households.

The AAP identifies how the City of Norwalk, proposes to utilize these funds in the upcoming fiscal year to address its community development, housing and public services goals and priorities as described in the Con Plan. The AAP also describes other projects and programs that leverage those funded by CDBG and HOME and further support the City's efforts to address its goals and priorities as identified in the Con Plan.

It is important to note that the Con Plan sets goals and strategies to be achieved over the FY 2020 – 2025 period and identifies a list of funding priorities. The five Con Plan goals represent high priority needs for the City of Norwalk and serve as the basis for FY 2022/23 programs and activities identified in the AAP. The Con Plan goals are listed below in no particular order:

- Provide decent affordable housing
- Maintain and promote neighborhood preservation
- Support special needs programs and services
- Construct or upgrade public facilities and infrastructure

### 2. Summarize the objectives and outcomes identified in the Plan

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

For details regarding the objectives and outcomes targeted in the Con Plan and this AAP in relation to each of the five goals listed above, please refer to sections AP-15 (Annual Goals and Objectives) and AP-35 (Projects).

### **3. Evaluation of past performance**

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

The FY 2020/21 AAP was successfully implemented. Examples of implementation progress are listed below:

- CDBG and HOME funds facilitated the rehabilitation of 17 housing units
- The Lead-Based Paint Testing and Abatement program tested 14 homes which exceeded the annual objective of 10 homes.
- The Fair Housing Foundation assisted 108 persons which exceeded the annual goal of 100 persons.
- Public services assisted 697 persons which exceeded the annual goal of 60.
- Emergency Assistance Program served 100 persons.

The City's AAPs and Consolidated Annual Performance and Evaluation Reports (CAPERs) have provided many details about the activities completed by the City in the past (documents may be viewed and/or downloaded from the City's website).

The City recognizes that the evaluation of past performance is critical to ensuring that the City and its sub-recipients are implementing activities effectively and that those activities align with the City's overall strategies and goals. The performance of programs and systems are evaluated on a regular basis.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

City staff developed a detailed participation plan that is part of the 2020-2025 Con Plan and provided a basis for the 2022 AAP's citizen participation and consultation process. As required by HUD, nonprofits and community residents were provided adequate opportunity to review and comment on the Annual Action Plan.

Citizens were engaged through two public meetings, one public hearing concerning the initial AAP followed by a final public hearing for the adoption of the AAP. Citizens who participated in the process received extensive information about the AAP, the citizen participation process, the HUD requirements for an entitlement City, the amount of funding that the City anticipates receiving and how those funds

can be used by the City. Residents were given the opportunity to provide City staff with their input on the prioritization of community needs.

Two public meetings were conducted in the development of the AAP on Thursday, February 3, 2022 at 6:30 p.m. at the Social Services Center located at 11929 Alondra Boulevard and March 1, 2022 at 6:00 p.m. at Norwalk City Hall. The first public hearing was held on March 15, 2022 at 6:00 p.m. at Norwalk City Hall, and a final public meeting was held on Tuesday, June 7, 2022 at 6:00 p.m. at Norwalk City Hall. At the public meetings and public hearing, information was provided about proposed projects for funding during FY 2022/23, the importance of the AAP, the process that will be undertaken to develop the plan, and a request for input from members of the public to identify community needs and priorities before drafting of the AAP.

The City also consulted with internal departments, external agencies, as well as social service and non-profit organizations to understand the community's needs and available resources. Department staff provided input on how CDBG and HOME resources could be used and leveraged to provide services.

The draft AAP was available for public review and comment for 30 days starting on March 21, 2022 through April 21, 2022. Copy of the AAP was available to the public on the City's website.

The final public hearing was held at City Hall in Council Chambers on June 7, 2022.

## **5. Summary of public comments**

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

February 3, 2022 Social Services Commission Meeting, Commissioner Legaspi made a comment regarding funding recommendations of the public services agencies. Commissioner Legaspi suggested staff reconsider Community Family Guidance Center for funding and reduce the recommended funding amounts for the other agencies. Commissioner Nuñez was in support of the review committee's funding recommendations for each agency. She stated that she trusted City staff's evaluations of the agencies applications.

Comment from Commissioner Legaspi and Commissioner Nuñez were noted by staff and will advise City Council.

March 1, 2022 City Council Study Session, Councilmember Ayala requested staff reach out to the Children's Dental Clinic and inquire about partnering for a referral service through the school district for 2023/24 program year. He also commented on the First Time Homebuyer program's maximum allowable purchase price limit being too low for our local market making the program challenging for potential applicants. Councilmember Rios spoke in favor of the First Time Homebuyer program and wanted to see City staff administer it during the program year. She also requested to reduce funding

from LA CADA and The Whole Child in the amount of \$2,500 each and allocate it to the Norwalk La Mirada Adult School for a total of \$20,000. Mayor Ramirez passed a motion to approve this change.

City staff made the changes requested by City Council and are reflected in the AAP.

March 15, 2022 City Council Public Hearing Meeting, Bill Sinko, Executive Director of Community Family Guidance Center presented to Council and the public the agencies accomplishments in assisting Norwalk youth residents with mental health services, services provided by the agency, plans to open a Norwalk office, build a relationship with the City's Social Services department and his disappointment for not being selected as a sub-recipient of the CDBG public services funds for FY 2022/23. Councilmember Perez requested previous quarter spending of all currently funded agencies. Mayor Rios requested that agencies requesting funding present their services before funding recommendations are made by the review committee and Social Services Commission and also asked for suggestions/recommendations for funding Community Family Guidance Center. The City Manager, Jesus M. Gomez, stated there were other sources available to fund agencies such as the general fund and ARPA. Councilmember Perez noted a subrecipient may be added if another agency recommended for funding is either removed or funding is reduced for the other selected agencies/subrecipients; Commissioners are well versed on the process for funding recommendations by the review committee; look at agencies that provide services to the community and were not recommended for funding, possibly fund them through other resources such as APRA. Councilmember Rios requested staff to provide more information on the agency selection and presentation of services by the agencies. Councilmember Ayala open to fund other agencies through ARPA or general funds if not approved for CDBG public services funds. Councilmember Valencia commented if agencies are funded through other resources what would be the duration of the funding.

No additional comments were received.

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

No additional comments were received.

## **7. Summary**

The Citizen Participation Plan sets forth the City's policies and procedures for public involvement in Norwalk's AAP Planning Process. It encourages participation by low and moderate-income persons, particularly those living in high poverty areas and in areas where CDBG funds are proposed. The Community Development Department, acting as the lead agency for the AAP, is responsible for the citizen participation process and for making available the Citizen Participation Plan and other CDBG documents.

**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	NORWALK		Community Development
HOME Administrator	NORWALK		Community Development

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Norwalk Community Development Department is the lead agency for overseeing the development of the Con Plan. This Department is also responsible for the preparation of the AAP, Consolidated Annual Performance and Evaluation Report (CAPER) and CDBG program administration. The Department also administers the City’s Housing Authority.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Under Norwalk City Council-Manager form of government, the City Council appoints and provides policy direction to the City Manager, who is responsible for administering the City’s daily operations. As the elected legislative body of the City of Norwalk, the City Council has overall responsibility for the scope, direction, and financing of City services. In setting policy, the City Council works closely with citizen advisory commissions and committees, considers staff information and recommendations, and receives comments from the general public during open forums.

In the preparation of the AAP, the City consulted with public and private agencies and social service and non-profit organizations to understand the community’s needs and available resources. The City met with several department representatives to provide information about the AAP and its processes. Department staff provided input on how CDBG and HOME resources could be used and leveraged to provide services.

During the consultation process, the City provided detailed information about the AAP process, the City’s distribution of funds and current projects using the CDBG and HOME funds.

### **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(I))**

The principal provider of community development and economic development programs, housing projects, and financial support will be the City of Norwalk. The Norwalk Housing Authority administers the Housing Choice (Section 8) Voucher program, Emergency Voucher Program, and Mainstream Vouchers. Activities to be undertaken by the Housing Authority are identified in the Public Housing Agency (PHA) 5-Year and One-Year Action Plans. The residents are invited each year to contribute to the drafting of the Housing Authority’s Plan. The City works closely with the Norwalk Housing Authority to qualify Norwalk residents for Section 8 Housing Choice Vouchers. The City provides information on the availability of Section 8 assistance to qualified residents, and for the Emergency Housing Voucher program through referrals from LAHSA’s CES and Mainstream vouchers through referrals from Kingdom Causes Bellflower and HOPE, LLC.

Other key health, mental health, and service agencies that the City works closely with are listed in Table 2. Each was consulted during the City's AAP process.



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

The City coordinates with the Los Angeles Homeless Services Authority (LAHSA). For over 20 years, LAHSA has been the primary applicant to HUD on behalf of the Los Angeles Continuum of Care (CoC). LAHSA provides grants to homeless organizations serving Norwalk. The programs provide service enriched housing for the formerly homeless, mentally ill, and permanent supportive housing for individuals with HIV/AIDS.

The City is also participating in the County of Los Angeles' initiative to combat homelessness and is working to identify ways the City can contribute to the County's strategies identified in a Los Angeles County Homeless Initiative report dated February 2016. In addition, the City has been providing funds to Kingdom Causes Bellflower for Homeless Prevention and Rapid Rehousing services.

The City of Norwalk is a member of the Gateway Cities Council of Governments (COG), which is leading an effort to address homelessness within our region. By action of the Board of Directors, policy direction was given to seek funding and collaboration in developing a plan to advance individuals from homelessness to a stabilized and productive life. The Gateway Cities COG partnered with the County of Los Angeles in making the homeless initiative a reality.

The City of Norwalk Social Services Department is the lead department in the City in coordinating with the LAHSA and Gateway Cities and implementing homeless count efforts. CDBG funding is provided to the Social Services Department for an Emergency Assistance Program, which provides assistance with utility and rent arrears and temporary motel vouchers. The program is open to any low-income Norwalk resident in need of emergency assistance, but principally benefits families with children. The City collaborates with Kingdom Causes to provide security deposit assistance to homeless individuals and families seeking permanent housing in Norwalk. This program is funded through the City's HOME funds and administered by the Housing Authority. The Housing Authority makes an ongoing effort to engage in partnerships with all Service Planning Area (SPA) 7 CoC partners to ensure that the most vulnerable Norwalk homeless and homeless veterans would benefit from the 7 homeless referrals made annually through Kingdom Causes Bellflower.

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

The City does not receive ESG funding. However, the City works closely with the continuum of care homeless system to create funding policies and procedures. The City supports the network of homeless service providers existing in and outside of Norwalk.

**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	<b>Agency/Group/Organization</b>	La Mirada School District
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
2	<b>Agency/Group/Organization</b>	PATH (People Assisting the Homeless)
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
3	<b>Agency/Group/Organization</b>	San Antonio Gardens
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
4	<b>Agency/Group/Organization</b>	Center Pointe Villas
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
5	<b>Agency/Group/Organization</b>	KINGDOM CAUSES BELLFLOWER
	<b>Agency/Group/Organization Type</b>	Services-homeless

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
6	<b>Agency/Group/Organization</b>	Southern California Resource Services for Independent Living
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
7	<b>Agency/Group/Organization</b>	Su Casa - Ending Domestic Violence
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Con Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
8	<b>Agency/Group/Organization</b>	Fair Housing Foundation
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
9	<b>Agency/Group/Organization</b>	The Whole Child
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
10	<b>Agency/Group/Organization</b>	LOS ANGELES CENTERS FOR ALCOHOL & DRUG ABUSE
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
11	<b>Agency/Group/Organization</b>	Homes for Life
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
12	<b>Agency/Group/Organization</b>	HOME OWNERSHIP FOR PERSONAL EMPOWERMENT (HOPE)
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
13	<b>Agency/Group/Organization</b>	Partnership Housing Inc.
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.
14	<b>Agency/Group/Organization</b>	Norwalk Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.

15	<b>Agency/Group/Organization</b>	JOVENES, INC.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency was invited to participate in public hearings and 30-day review of the Plan. The anticipated outcome of the consultation is improved data and planning within the selected sections above.

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

Not applicable.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	LAHSA	The County of Los Angeles is a Continuum of Care applicant and conducts homeless counts, surveys of the homeless population, and strategic planning to end homelessness. Consistent with the goals of the CoC, the City of Norwalk's Strategic Plan will provide support to nonprofits that meet the social service needs of residents with an emphasis on homeless prevention and rapid rehousing.
Housing Element	City of Norwalk	Based on the Regional Housing Needs Allocation (RHNA) set forth by the State of California, the Housing Element is the City's chief policy document for the development of affordable and market rate housing. Consistent with this policy document, the City will maintain and enhance the quality of existing residential neighborhoods and promote and encourage fair housing opportunities for all economic segments of the community, regardless of age, sex, ethnic background, physical condition, or family size.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Homelessness Plan	City of Norwalk	On April 10, 2018, the City Council adopted a Plan to Prevent and Combat Homelessness. The City's strategic plan includes utilization of CDBG public services for homeless and residents at risk of homelessness.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**



**AP-12 Participation – 91.105, 91.200(c)**

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

City staff developed a detailed participation plan that is part of the Five Year Consolidated Plan 2020-25. As required by HUD, nonprofits and community residents were provided adequate opportunity to review and comment on the original Citizen Participation Plan and on substantial amendments to the plan, if necessary.

This year during the development of the AAP, citizens had the opportunity to attend two public meetings and one initial public hearing followed by a final public hearing for the adoption of the AAP. Those who participated in the process received information about the AAP, the HUD requirements for an entitlement City, the amount of funding that the City anticipates receiving and how those funds can be used by the City. Residents were given the opportunity to provide City staff with their input on the prioritization of community needs at public meetings, the first public hearing, during the 30-day AAP review period, and again at a second public hearing. Each of these efforts, including review of HUD Data and relevant policy documents, assisted the city in its goal setting efforts particularly related to activities related to non-housing services.

**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 Meeting	Non-targeted/broad community	17	See attached.	Not applicable.	
2	Public Meeting	Non-targeted/broad community	7	See attached.	Not applicable.	

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)
3	Public Hearing	Non-targeted/broad community	10	See attached.	Not applicable.	
4	Newspaper Ad	Non-targeted/broad community	General circulation	Not applicable.	Not applicable.	
5	Newspaper Ad	Non-targeted/broad community	General circulation	Not applicable.	Not applicable.	
6	Newspaper Ad	Non-targeted/broad community	General Circulation	Not applicable.	Not applicable.	
7	Public Hearing	Non-targeted/broad community	Scheduled for June 7, 2022	Not applicable.	Not applicable.	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The figures shown in the Anticipated Resources table reflect HUD’S 2022 allocations. The City will receive CDBG Entitlement of \$1,117,591 and HOME Entitlement of \$358,412. The figure for “Expected Amount Available for Remainder of Con Plan” anticipates level funding using the current year allocations and projecting those allocations over the remaining years covered by the Consolidated Plan. If there are further cuts to the City’s allocation over the coming years, the City will adjust this figure accordingly and prepare the Annual Action Plan reflective of the funding reality. Estimated Program Income and Carryover for CDBG and HOME will be adjusted at the end of the current program year. Program Income and carryover will be allocated to Housing Rehabilitation, Affordable Housing, and/or Capital Improvement Projects.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,117,591	100,000	400,000	1,617,591	1,873,496	In Year 3, the City will receive \$1,117,591 in CDBG Entitlement funds. Any unencumbered funds from prior year(s) resources will be allocated to capital improvement projects or housing rehabilitation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA  HOME –ARP Administrative Relief	358,412	300,000	430,734	1,089,146	-254,985	In Year 3, the City will receive \$358,412 in HOME Entitlement Funds. Any unencumbered funds from prior year(s) resources will be allocated to an affordable housing project.

**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 will attempt to leverage grants and other funding when appropriate to meet AAP objectives as follows:

Housing Bond Funds: The City will allocate funds from the former Redevelopment Agency Housing Set Aside for Homeless Prevention and Rapid Rehousing. In the future, HOME matching requirements may be satisfied through the use of the City's housing bond funds or through private developers or City owned land to develop affordable housing

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

The City does not have any land at this time that could be used for activities identified in the plan. If the City acquires some land for purposes that include an activity identified in the Annual Action or

Consolidated Plan, the City will report this acquisition to HUD through the CAPER process.

### **Discussion**

The resources identified above are estimates. When the final CDBG and HOME Program Income and carryover are known funding for individual projects will be funded/adjusted as stated in the introduction.

The City has received \$61,597 from HUD as an initial installment to prepare the HOME-ARP Allocation Plan. These funds will cover all costs associated with the preparation of this 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	Increase affordable housing opportunities	2020	2025	Affordable Housing	City Wide	Provide decent affordable housing	HOME: \$225,000	Direct Financial Assistance to Homebuyers: 2 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted
2	Preserve, rehabilitate, and enhance neighborhoods	2020	2025	Affordable Housing	City Wide	Maintain and promote neighborhood preservation	CDBG: \$546,435	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
3	Provide vital support services	2020	2025	Public Service	City Wide	Support special needs programs and services	CDBG: \$167,638	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
4	Enhance economic development opportunities	2020	2025	Non-Housing Community Development	Qualified Census Tracts	Construct or upgrade public facilities and infrastructure	CDBG: \$180,000	Businesses assisted: 4 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Planning and grant administration	2020	2025	Planning	City Wide	Provide decent affordable housing Maintain and promote neighborhood preservation Support special needs programs and services Create public awareness of fair housing	CDBG: \$247,443 HOME: \$35,841 HOME ARP: \$61,597	Other: 1 Other CDBG Grant Management HOME Grant Management Fair Housing Foundation Benefit 100 households

**Table 6 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Increase affordable housing opportunities
	<b>Goal Description</b>	Addresses the need to provide decent affordable housing. Norwalk seeks to increase the affordable housing stock by supporting: the planning, design, and construction of new housing units; homeownership through new or existing home buyer and rental assistance programs; new multifamily rental unit construction; the building or converting existing buildings for homeless housing; housing construction vocational and skills training programs, CHDO agencies and project work, security deposit assistance and tenant-based rental assistance, and education and community outreach.
2	<b>Goal Name</b>	Preserve, rehabilitate, and enhance neighborhoods
	<b>Goal Description</b>	Addresses need to maintain and promote Neighborhood Revitalization. Norwalk supports enhancing existing housing stock by improving housing conditions, decreasing vacancy, and creating decent and livable homes, which will ultimately increase housing opportunities for low- and moderate-income and homeless families through the following types of activities: housing acquisition and/or rehabilitation; and homebuyer and rental assistance programs.
3	<b>Goal Name</b>	Provide vital support services
	<b>Goal Description</b>	Addresses the need to support special needs programs and services. Norwalk will continue to support innovative services that address outstanding needs that provide a benefit to wide sectors of the community.



4	<b>Goal Name</b>	Enhance economic development opportunities
	<b>Goal Description</b>	Construct or upgrade public facilities and infrastructure. Norwalk shall establish a stable, healthy, and balanced economic base, which is compatible with the community's needs. Norwalk shall promote businesses that provide a variety of goods and services and employment opportunities by assisting commercial property owners with business operations and expansion loan programs, façade improvement grant and loan programs, and workforce training and development programs.
5	<b>Goal Name</b>	Planning and grant administration
	<b>Goal Description</b>	Planning and Administration. Norwalk will continue to provide planning and administration services required to manage and operate the City's CDBG and HOME programs. Such funds will assist in managing community development, housing, and economic development programs. Funds will also be used for other planning initiatives such as strategies to further fair housing and infrastructure planning.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City of Norwalk plans to undertake the following projects in Program Year 2022/23. The City plans to allocate 15% or \$167,638 of its 2022 CDBG allocation to public service activities. Unencumbered funds from prior year(s) resources and program income will be allocated to capital improvement or housing rehabilitation projects.

#### Projects

#	Project Name
1	Program Administration - CDBG
2	Program Administration - HOME
3	Fair Housing Services
4	Emergency Services Social Services Center
5	Norwalk La Mirada Adult School Job Training
6	Su Casa Ending Domestic Violence
7	Los Angeles Centers for Alcohol and Drug Abuse
8	Community Legal Aid
9	Helpline Youth Counseling
10	The Whole Child
11	Residential Rehabilitation - CDBG
12	Capital Improvement Project
13	Business Incentive Loan Program
14	CHDO Set-Aside
15	TBRA Security Deposit Assistance
16	First Time Homebuyer Program
17	HOME-ARP – Allocation Plan

Table 7 - Project Information

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

The projects will address the priority needs described in the Con Plan and enhance services to the homeless or residents at risk of homelessness.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Program Administration - CDBG
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Planning and grant administration
	<b>Needs Addressed</b>	Provide decent affordable housing Maintain and promote neighborhood preservation Support special needs programs and services
	<b>Funding</b>	CDBG: \$210,518
	<b>Description</b>	Norwalk will continue to provide planning and administration services required to manage and operate the City's CDBG program. Such funds will assist in managing community development, housing, and economic development programs. Funds will also be used for other planning initiatives such as strategies for affordable housing and infrastructure planning.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other
	<b>Location Description</b>	CDBG Program Administration is located at Norwalk City Hall, 12700 Norwalk Boulevard, Room 12, Norwalk CA 90650
	<b>Planned Activities</b>	Program administrative costs of CDBG and Fair Housing operations.
2	<b>Project Name</b>	Program Administration - HOME
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Planning and grant administration
	<b>Needs Addressed</b>	Provide decent affordable housing
	<b>Funding</b>	HOME: \$35,841
	<b>Description</b>	Norwalk will continue to provide planning and administration services required to manage and operate the City's HOME program. Such funds will assist in managing housing initiatives, rehabilitation, and new affordable housing development.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other
	<b>Location Description</b>	HOME Program Administration is located at Norwalk City Hall, 12700 Norwalk Boulevard, Room 12, Norwalk, CA 90650
	<b>Planned Activities</b>	Program administrative costs for HOME operations. Fair housing program is listed separately but is funded out of CDBG program administration.
<b>3</b>	<b>Project Name</b>	Fair Housing Services
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Planning and grant administration
	<b>Needs Addressed</b>	Create public awareness of fair housing
	<b>Funding</b>	CDBG: \$13,000
	<b>Description</b>	Funding for Fair Housing Services
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 100 residents
	<b>Location Description</b>	The Fair Housing Foundation is located at 3605 Long Beach Blvd., #302, Long Beach, CA provides Norwalk with fair housing services.
<b>Planned Activities</b>	Fund the Fair Housing Foundation services for City of Norwalk to provide training, outreach, and legal services to ensure that all housing is available without discrimination.	
<b>4</b>	<b>Project Name</b>	Emergency Services Social Services Center
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	CDBG: \$67,500

	<b>Description</b>	Provide rental assistance for homeless individuals and families to prevent eviction, for utility assistance, and for temporary lodging vouchers.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 low-to-moderate income households will be assisted.
	<b>Location Description</b>	Program will be located at the Social Services Center, 11929 Alondra Blvd. in Norwalk.
	<b>Planned Activities</b>	Provide homeless prevention services, such as utility assistance, emergency rental assistance and motel vouchers, for low-to- moderate income residents.
5	<b>Project Name</b>	Norwalk La Mirada Adult School Job Training
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Enhance economic development opportunities
	<b>Needs Addressed</b>	Create job generating businesses and job training
	<b>Funding</b>	CDBG: \$18,000
	<b>Description</b>	Provide job training to assist residents with obtaining skills necessary to obtain jobs in fields that are in demand.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 12 low-to-moderate income residents.
	<b>Location Description</b>	Training will be provided by the Norwalk-La Mirada Adult School at three campuses located at 12940 East Foster Road in Norwalk, 15920 Barbata Rd., in La Mirada or 13520 Adelfa Dr. in La Mirada.
	<b>Planned Activities</b>	Provide scholarships to low- and moderate- income residents participating in certificated occupational training through the Norwalk-La Mirada Adult School.
6	<b>Project Name</b>	Su Casa Ending Domestic Violence
	<b>Target Area</b>	City Wide

	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	CDBG: \$18,000
	<b>Description</b>	Su Casa will provide permanent housing placement with supportive services for domestic violence survivors.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 domestic violence survivors will be assisted.
	<b>Location Description</b>	Su Casa walk-in center is located at 3750 E. Anaheim St. Suite 100, in Long Beach, CA. Counseling is also offered via telehealth. Shelter locations are confidential
	<b>Planned Activities</b>	Provide financial assistance to Su Casa to place domestic violence survivors in permanent housing with services.
7	<b>Project Name</b>	Los Angeles Centers for Alcohol and Drug Abuse
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	CDBG: \$15,750
	<b>Description</b>	Drug and alcohol addiction treatment.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 low-to-moderate income individuals
	<b>Location Description</b>	Los Angeles Centers for Alcohol and Drug Abuse (LA-CADA) is located at 11015 Bloomfield Ave. in Santa Fe Springs.
	<b>Planned Activities</b>	Provide funding for outreach to Norwalk residents, coordination with homeless service providers, dedicated counselors to accept direct referrals, and provide residential substance abuse treatment.
	<b>Project Name</b>	Community Legal Aid

8	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	CDBG: \$18,000
	<b>Description</b>	Funds services and operations in connection with Legal counseling & services to victims of domestic abuse and evictions of tenants.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 low to moderate income individuals
	<b>Location Description</b>	Legal aid office location 12440 E. Firestone Blvd. Suite 309, Norwalk 90650
	<b>Planned Activities</b>	Provide legal counseling at the Social Services Center and financial assistance to DV victims; tenant rights and debt collection legal assistance.
9	<b>Project Name</b>	Helpline Youth Counseling
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	CDBG: \$18,000
	<b>Description</b>	Funds services and operations in connection with mental and behavioral health services for youth (18 to 24years old).
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	30 youth
	<b>Location Description</b>	Helpline Youth Counseling Norwalk office location is 12440 Firestone Blvd, Suite 316 in Norwalk



	<b>Planned Activities</b>	Provide financial assistance to Helpline Youth Counseling. to provide behavioral health, individual, group and family counseling services for youth and families.
<b>10</b>	<b>Project Name</b>	The Whole Child
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Provide vital support services
	<b>Needs Addressed</b>	Support special needs programs and services
	<b>Funding</b>	\$12,388
	<b>Description</b>	Provide rapid-rehousing and wrap around services for households at risk of homelessness or homeless.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15
	<b>Location Description</b>	Family Solutions Access Center location 8630 Florence Ave., Downey 90240
<b>Planned Activities</b>	Provide in person services at the City’s Social Services Center and enhance the level of intervention for homeless families who are assessed as having high vulnerability.	
<b>11</b>	<b>Project Name</b>	Residential Rehabilitation - CDBG
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Preserve, rehabilitate and enhance neighborhoods
	<b>Needs Addressed</b>	Maintain and promote neighborhood preservation
	<b>Funding</b>	CDBG: \$546,435
	<b>Description</b>	Provide grants and loans to homeowners of single-family homes, condominiums/townhomes, mobile homes, and rental homes for low to moderate income residents to make home improvements.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10: LMI homeowners and 1 low-income renter will benefit.
	<b>Location Description</b>	City wide
	<b>Planned Activities</b>	The City will provide grants and loans to low-and moderate-income homeowners and 1-4 unit rental properties to make home improvements. Lead testing and abatement will be carried out under this project.
<b>12</b>	<b>Project Name</b>	Capital Improvement Project
	<b>Target Area</b>	C.T. 5526
	<b>Goals Supported</b>	To preserve, rehabilitate and enhance existing public infrastructure
	<b>Needs Addressed</b>	Construct or upgrade public facilities and infrastructure
	<b>Funding</b>	CDBG: \$500,000
	<b>Description</b>	Undertake street rehabilitation and improvements to sidewalks, curbs, gutters, and ramps in CDBG eligible census tract 5526.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2,625 low to moderate income residents will benefit.
	<b>Location Description</b>	Residential streets South of Excelsior, North of Alondra, West of Pioneer and East of Norwalk Blvd.
	<b>Planned Activities</b>	Street rehabilitation and improvements to curbs, gutters, sidewalks and ramps.
<b>13</b>	<b>Project Name</b>	Business Incentive Loan Program
	<b>Target Area</b>	Qualified Census Tracts
	<b>Goals Supported</b>	Enhance economic development opportunities
	<b>Needs Addressed</b>	Create job generating businesses and job training
	<b>Funding</b>	CDBG: \$180,000

	<b>Description</b>	Provide financial assistance to local businesses for expansion, building improvements, new employee salaries and or equipment creating more sustainable neighborhoods.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One business to be assisted for building improvement and equipment.
	<b>Location Description</b>	Commercial areas within the City of Norwalk CDBG eligible census tracts.
	<b>Planned Activities</b>	Provide assistance to commercial property owners to make building improvements. The City may defer use of these funds in 22/23 in order to add future CDBG funds to complete a more substantial project.
<b>14</b>	<b>Project Name</b>	CHDO Set-Aside
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Increase affordable housing opportunities
	<b>Needs Addressed</b>	Provide decent affordable housing
	<b>Funding</b>	HOME: \$53,761
	<b>Description</b>	Assistance to Community Housing Development Organization (CHDO) to provide affordable housing.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To be determined
	<b>Location Description</b>	To be determined
	<b>Planned Activities</b>	Provide assistance to a CHDO to provide affordable housing. The City may defer use of these funds in FY2022/23 in order to add future HOME funds to complete a more substantial project.
<b>15</b>	<b>Project Name</b>	TBRA Security Deposit Assistance
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Increase affordable housing opportunities

	<b>Needs Addressed</b>	Provide decent affordable housing
	<b>Funding</b>	HOME: \$25,000
	<b>Description</b>	Provide one-time grant to Section 8 voucher holders and the homeless to assist with security deposits.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	12 very low-income households
	<b>Location Description</b>	Administrative services will be provided at the Housing Authority, 12700 Norwalk Blvd., Room 12, Norwalk, CA.
	<b>Planned Activities</b>	Provide grants for security deposits to new Section 8 voucher holders and homeless individuals.
16	<b>Project Name</b>	First Time Homebuyer Program
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Increase affordable housing opportunities
	<b>Needs Addressed</b>	Provide decent affordable housing
	<b>Funding</b>	HOME: \$200,000
	<b>Description</b>	In a loan to grant format, the City intends to assist eligible LMI income home buyers for down payment and closing cost assistance.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 LMI families
	<b>Location Description</b>	Locations to be determined
	<b>Planned Activities</b>	Provide grant assistance to eligible LMI families for the purchase of a home.
17	<b>Project Name</b>	Program Administration – HOME ARP Allocation Plan
	<b>Target Area</b>	City Wide
	<b>Goals Supported</b>	Planning and grant administration

<b>Needs Addressed</b>	Provide decent affordable housing
<b>Funding</b>	HOME: \$61,597
<b>Description</b>	Prepare the plan and studies and identify projects for the HOME ARP funds
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	n/a
<b>Location Description</b>	HOME Program Administration is located at Norwalk City Hall, 12700 Norwalk Boulevard, Room 12, Norwalk, CA 90650
<b>Planned Activities</b>	Program administrative costs for preparation of the HOME-ARP Allocation Plan.

## **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**

Any of the CDBG activities funded in FY 2022/23 are offered City wide to low- and moderate-income households. However, for certain CDBG programs, such capital improvements and commercial improvements, investment is directed to neighborhoods that qualify for CDBG funds on an "area benefit" basis. An area benefit activity is one that is available to benefit all the residents of an area, which is: Primarily residential and where 51% of the population is low- and moderate-income. Activities to enhance commercial improvements will be offered City wide to commercial properties containing businesses located within CDBG eligible areas.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City Wide	100
Qualified Census Tracts	

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Norwalk is prioritizing their efforts Citywide. All social services, economic development and job training efforts, residential rehabilitation, as well as homeless prevention efforts will be undertaken as citywide initiatives.

In the future, qualified census tracts (low- and moderate-income areas) may receive infrastructure, roads, and sidewalk improvements when there are sufficient funds to support these projects.

### **Discussion**

See sections above.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The AAP must specify goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing within the program year. The AAP must also indicate the number of affordable housing units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units. For the purpose of this section, the term “affordable housing” is defined in the HOME regulations at 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	15
Non-Homeless	59
Special-Needs	0
Total	74

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	37
The Production of New Units	0
Rehab of Existing Units	16
Acquisition of Existing Units	0
Total	53

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

### Discussion

There is a lack of decent affordable units across the board in the City of Norwalk, resulting in much of the housing stock being out of the affordable range. For low-income renters, access to decent affordable units is even more daunting. According to 2017 ACS data, 60% of renters were cost burdened or paying more than 30% of their income on housing. In 2018, Fair Market rents were considerably higher than HOME Rents.

Of the residents living below the poverty level, 63.1% are renters (CityData.com-2016). This data coupled with the City’s 2017 rental vacancy rate of (3.5%) points to the difficulty of accessing quality affordable units for lower income residents.

The lack of affordable housing in Norwalk’s housing market will be addressed in FY 2022/23 with several City initiatives including: Security Deposit Assistance Program, Residential Rehabilitation, First Time

Homebuyers Program, Emergency Services Program, and through job training efforts to increase household incomes. TBRA, operated by the Authority, will provide \$25,000 in HOME funding to assist Section 8 voucher holders and the homeless with security deposit. The City also plans to continue a First Time Home Buyer Program to reduce down payment and closing costs.

The City of Norwalk uses HOME funds for homebuyer assistance of owner-occupied single-family properties. The City must use the HOME affordable homeownership limits provided by HUD when setting price limits for affordable home sales. Also, the use of funds for HOME assisted activities requires that the value of the property after rehabilitation must not exceed 95 percent of the median purchase price for the area.

Further discussion can be found in Program Specific Requirements for HOME section and attachment C, Grantee Unique Appendices.



## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Authority administers the Housing Choice Voucher Program, Mainstream Vouchers, Emergency Housing Vouchers and the FSS Program. The Authority allocates 705 Section 8 vouchers, 15 Mainstream Vouchers, 46 Emergency Housing Vouchers, and 13 FSS slots. The Authority does not have any public housing units. The Authority's goals are to maximize voucher utilization, maintain "high performer" status, promote economic self-sufficiency, apply for new rental vouchers, if available, and undertake affirmative measures to provide a suitable living environment for families living in assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.

Like many cities in the county, homelessness continues to be a prominent issue for the city of Norwalk. According to the Los Angeles Homeless Services Authority (LAHSA), 66,436 individuals were experiencing homelessness in Los Angeles County in 2020: a 13% increase from 2019. According to LAHSA there were approximately 168 homeless individuals in the city of Norwalk in 2020 (due to COVID-19, LAHSA was unable to conduct their most recent count in 2021). While this represents a decline from prior years, homelessness and the attendant problems of mental illness and substance abuse are prominent issues across the city. Norwalk is also home to two facilities that are part of a State, County and LAHSA collaborative effort to minimize the spread of COVID-19 by providing housing to vulnerable people experiencing homelessness. Project Room Key is a 210-room former hotel and Project Home Key is a former 53-room motel in the city of Norwalk. Individuals housed in these two locations are free to move about the city of Norwalk during the day as long as they return to the facility at night.

Los Angeles County resources to assist the homeless, including treatment for mental illness and addiction, as well as food, clothing and other day-to-day needs are stretched thin. Crime, unhealthy accommodations, panhandling, and other problems are constants. These are dealt with by Norwalk's Department of Public Safety (DPS) and Department of Social Services (DSS), the Los Angeles County Sheriff's Department (LASD), and the Los Angeles County Department of Mental Health (LADMH). In addition, non-profit organizations assist with services and outreach (e.g., the National Alliance on Mental Illness or NAMI).

Norwalk has bifurcated its approach to overall safety by contracting with the Los Angeles County Sheriff's Department (LASD) and by establishing a civilian-based Department of Public Safety. LASD responds to calls for service through its Norwalk Station. LASD responds to calls for service that involve potential felony-related activity (disturbances, shootings, etc.), traffic, or special assignments (narcotics and vice).

Norwalk's DPS is responsible for quality-of-life issues, enforcing municipal codes, assisting at traffic accidents, enforcing parking restrictions, administering to the homeless, overseeing emergency management concerns, and other public safety matters.

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

The Authority does not have public housing. However, due to the limited supply of rental housing in

Norwalk, the HOME program will be providing security deposit assistance to new Section 8 voucher holders to help voucher holders be more successful in securing rental housing.

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

The Authority does not own or maintain public housing at this time. However, the Authority encourages homeownership among its voucher program recipients through its Family Self-Sufficiency Program.

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

The Authority is not designated as troubled. The Authority has received a standard performance designation by HUD.

**Discussion**

See above.

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

### **Introduction**

This section describes the City’s one-year goals and the specific action steps it will undertake in the program year to carry out the homeless strategy outlined in SP-60 Homelessness Strategy. It will also describe the jurisdiction’s one-year goals and specify the activities it will undertake to serve the housing and supportive service needs of non-homeless populations who require supportive housing.

### **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 City Council adopted a plan to prevent and combat homelessness. The plan identifies 5 goals:

1. Better understand the population and impacts, and educate the community
2. Improve coordination of housing and services among City and key stakeholders
3. Explore the creation of immediate short-term solutions
4. Develop new strategies to increase income through employment and public benefits attainment
5. Create new supportive and affordable housing opportunities

During the Program Year, the City plans to coordinate outreach with LAHSA, Los Angeles Drug and Alcohol, People Assisting the Homeless (PATH), Jovenes, and The Whole Child. Coordination with such entities promotes communication about where homeless encampments are forming and progress the teams have made in assessing homeless individuals. The City uses the Los Angeles County Homeless Portal to refer homeless residents to the LAHSA outreach team.

The City will continue to support programs and strategies, which addresses the Priority Needs of Homeless Persons and Families in the following ways:

Provide CDBG funding to support programs and services for the homeless and those in need of housing assistance through its CDBG Public Service Funding, including the Emergency Assistance Program

Use HOME funds to assist homeless individuals and families with security deposits.

Provide other funds to support homeless prevention and rapid rehousing services offered by The Whole

Child and Kingdom Causes Bellflower.

The Housing Authority has a contract with Kingdom Cause Bellflower to house 7 families experiencing homelessness through its Housing Choice Voucher program.

The City will support the Homeless Operation Prevention and Engagement (HOPE) team. The HOPE team consists of a lieutenant, one Public Safety Officer (PSO), two maintenance workers, and a code compliance inspector that works with the team. The HOPE team works Monday through Friday from 5:00 AM to 2:00 PM. HOPE conducts outreach, educates the homeless on available services, addresses resident and business concerns, conducts clean-ups of encampments and assists in enforcement of violations such as trespassing and public intoxication. LASD communicates with the HOPE team regarding those who are involved in felony-related activity or those whom LASD encounters outside of HOPE's hours of operation. HOPE uses this approach to identify key areas of need and provide useful information to social services regarding homeless individuals in Norwalk.

The Housing Authority has a contract with the County of Los Angeles to receive Homeless Incentive Program (HIP) funds through Measure H. These funds help individuals experiencing homelessness who have received an HCV voucher through the Authority with security deposits, utility deposits and furniture.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City will continue to support the following emergency shelter and transitional housing needs of homeless persons through The City of Norwalk Social Services Department (SSD) and agencies funded under Public Services:

The SSD offers public assistance programs and services designed to assist homeless and low-income Norwalk residents and those in need of transitional services, emergency shelter or food. The SSD provides motel vouchers for up to three (3) nights, depending on the circumstance, for emergency lodging for persons in need of temporary shelter. Client must be working homeless provider agency or plan in place.

Los Angeles Centers for Alcohol and Drug Abuse (LA-CADA) provides residential treatment and transitional housing with services for homeless residents with substance abuse and behavioral health needs. CDBG funds will be used to increase substance abuse treatment outreach and coordination with the homeless outreach team.

Su Casa provides emergency and transitional housing for domestic violence survivors. CDBG funds will be used to support domestic violence counseling and placement in permanent housing with services.

Additionally, the City will support the County's CoC funding application which includes transitional

shelter programs and permanent supportive housing.

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

The HOPE team works with Norwalk's Social Services Department to help the homeless population obtain specialized assistance. PSOs assist Social Services with their general understanding of the homelessness problem in Norwalk as well as maintaining information about clients. For example, HOPE maintains a working list of homelessness hot spots in the city based on census tracts.

Homeless Prevention and Rapid Rehousing Program;

Security Deposit Assistance Program;

Section 8 Housing Choice Voucher Limited Homeless Preference;

Emergency Assistance Program;

The Social Services Department (SSD) is the lead department in the City in coordination with the LAHSA and Gateway Cities and implementing homeless count efforts. CDBG funding is provided to SSD for an Emergency Assistance Program, which aids with utilities and temporary housing. The program is open to any low-income Norwalk resident in need of emergency assistance, but principally benefits families with children. The City will financially support programs and services for the homeless through its CDBG Public Service Funding. In addition, the City will use HOME funds to assist homeless individuals and families with security deposits.

Kingdom Causes Bellflower is able to help prevent families and individuals from becoming homeless by paying rental arrears, utility assistance, move-in cost of homeless neighbors from Norwalk. KCB also provides landlord mediation, referrals to other providers, case management, and budget counseling for households, all things that contribute to household stability.

**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.**

SSD offers public assistance programs and services designed to assist low-income Norwalk residents and those in need of emergency shelter. According to SSD, motel vouchers are issued for up to three (3) nights, depending on the circumstance, for emergency lodging for persons in need of temporary shelter. Often times, persons seek this service because they need a place to sleep while they wait to be admitted into a homeless shelter, are unable to afford shelter for short period of time, need of a place to get cleaned up and rest or may have been displaced due to fire / home emergency.

Many of the constituents who seek assistance from SSD are low-income households at risk of homelessness or homeless. They come in for food assistance, dispute resolutions regarding complaints about the living conditions at motels and rental units, advocacy assistance for services through other agencies, and referrals to drug/alcohol rehabilitation facilities, homeless shelters, medical treatment facilities and other agencies.

The City has taken additional efforts to address homelessness by collaborating with the Gateway Cities Council of Governments, Gateway Connections Program, to offer housing and services to persons who are homeless. This program, along with the Social Services and Community Development Departments and the Authority, serves as a bridge between those who are in need and resources that are available. The SSD is currently working with LAHSA on the annual Point-in-Time Homeless Count and refers families to The Whole Child Family Solutions Center and People Assisting the Homeless (PATH), which provide homeless services for SPA 7.

## **Discussion**

See above.

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

### **Introduction:**

With the absence of the Norwalk Redevelopment Agency, Low and Moderate Housing Set-Aside Funds and reduced CDBG and HOME Program funds, the City actively seeks replacement funding sources to recover lost funding in efforts to continue facilitating affordable housing. It is unlikely that the City will be able to recover 100% of funding that was lost. Despite this, the City will make attempts to seek replacement funding assistance for affordable housing and continue to implement initiatives outlined in the City's Housing Element.

### **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**

Favorable land use zoning codes for affordable housing include:

Studying the need to reduce current development standards or policies related to parking for the construction of affordable, multi-family housing. The general commercial zone allows mixed use development permitting apartments in upper floors.

Special land use districts include special needs populations housing at high density (up to 70 dwelling unit/acre)

Planned Unit Development and Specific Plans permit higher density for condominium units, which may bring housing ownership at an affordable cost.

Expand Density Bonus Ordinance and Reasonable Accommodation Ordinance to create the opportunity for the construction of affordable housing

Transitional and supportive housing and single room occupancy units allowed, by right or with a conditional use permit, within residential zones throughout the City.

City adopted separate regulations for Reasonable Accommodation Procedures (Section 17.02.202) that establish procedures for disabled persons or their representatives to request a reasonable accommodation from the City's zoning laws, codes and land use regulations, policies, practices, and procedures to provide disabled persons with an equal opportunity to use and enjoy a dwelling. The City will promote these new amendments to private and nonprofit housing developers to assist in removing barriers to affordable housing, especially housing for special needs populations.

The City is currently working on drafting a new Housing Element to incorporate additional policies for

the creation of housing units at various levels with supportive programs for Affordable Housing and programs to further fair housing. The Housing Element is expected to be completed by year-end and changes will be reflected in the 2023/24 Annual Action Plan.

**Discussion:**

See above.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The City has planned actions to address needs. See discussions below.

### **Actions planned to address obstacles to meeting underserved needs**

The City of Norwalk's FY 2022/23 AAP proposes projects and activities to meet the priorities described in the Con Plan. It describes eligible programs, projects, and activities to be undertaken with anticipated funds and their relationship to identified needs for housing, homelessness, and community and economic development. Overall, Norwalk has the following specific actions it plans to undertake to address the obstacles to meeting underserved needs over the 2022 program year:

- Fund projects that enhances economic opportunities such a job training and commercial improvements;
- Continued support of area nonprofit agencies, particularly those programs that provide services to homeless, at-risk youth, and residents facing housing insecurity;
- Continued support of programs that improve the living environment of low- and moderate-income families residing in substandard housing and overcrowded living conditions;
- Fund capital projects that enhance public facilities and or street improvements;
- Continued support of Programs that expand the stock of affordable housing within the City; and
- Continued support of Programs that promote fair housing, especially targeting extremely low- and low-income households.

### **Actions planned to foster and maintain affordable housing**

The City's CHDO set-aside funds will be used to support future efforts for the acquisition of existing housing to provide affordable housing.

The City continues to provide grants and rebates to owners of 1-4 unit rental housing to make repairs and improvements to the rental housing stock. At least 51% of the units must be occupied by low-income households, the rent must be affordable, and the rent must not be increased for two years following project completion. Affordable rent is defined as the Fair Market Rent less the Authority's Maximum Utility Allowance effective on July 1 of each program year.

### **Actions planned to reduce lead-based paint hazards**

Throughout Norwalk, 92% of all owner-occupied housing units and 75% of all renter-occupied units were built prior to 1980. That means 16,729 owner units and 7,031 renter units are at risk for lead-based paint hazards. Furthermore, children are most at risk for experiencing Lead-Based Paint related illnesses.

Housing built before 1978 is considered at risk for lead-based paint hazards.

Therefore, special attention should be paid to homes built prior to 1978 where children are present. Two percent of owner-occupied (315 units) homes and 4% of renter occupied homes (385), built prior to 1980, have children living in the home. Lead poisoning education and abatement efforts in Norwalk are provided through the cooperative efforts of the County Public Health Department. The abatement of lead-based hazards is a vital component of the City of Norwalk's Housing Rehabilitation Program. All housing rehabilitation projects are assessed for lead based paint and lead based paint abatements are performed by licensed contractors.

### **Actions planned to reduce the number of poverty-level families**

In 2019 and 2020 the City completed an Analysis of Impediment to Fair Housing Choice (AI). The AI provided goals and actions related to increasing household earning capacity. The following goal and action steps were included:

Goal: Increase training and employment opportunities (a new goal in the 2020-2025 Con Plan)

Actions/Activities:

- Work with community colleges and high schools to establish or further carpentry, mechanical, plumbing, and electrical skills training. The construction industry is projected to increase.
- Create mentoring programs with local skilled trades companies.
- Improve education and provide skills training for education, healthcare, manufacturing, and construction jobs.
- Create partnerships with California's Employment Development Department, Workforce Development Board, Workforce Development Aging & Community Services, California Building Industry Association, Southern California Building Association, Cerritos Community College, Cypress College, Rio Hondo Community College, and workforce readiness programs available in local vocational and technical schools and programs. Such programs exist in the Junior Achievement of Southern California and the L.A. Opportunity Youth Collaborative.
- Continue coordination with the Southeast Los Angeles County Workforce Investment Board, Department of Public Social Services, Employment Development Department, Adult Schools, YouthBuild, and Department of Rehabilitation through the America's Job Center of California System Management Team.
- Increase training opportunities that target "Second Chance", persons with disabilities, at-risk homeless individuals, and job retraining program.
- Continue to create successes in the Norwalk La Mirada Adult School's cost-effective occupational training program for high demand jobs. In FY 2022/23, \$18,000 in CDBG funds will be used to pay for occupational training for ten low-to-moderate income residents. The training will help residents who are unemployed or under-employed be successful in medical and welding careers.

The City will continue to support the Authority's Family Self-Sufficiency program, which helps Section 8 voucher recipients become economically self-reliant.

### **Actions planned to develop institutional structure**

The City's Community Development Department will administer CDBG and HOME funds and most of the activities identified in the AAP with the exception of public service programs. The City works closely with other housing-related organizations and service providers in the County to ensure that the housing needs of City residents are addressed given available resources.

The Department works in conjunction with its Authority to ensure quality housing for all low-income City residents. The working relationships between these organizations are strong and facilitative. Due to the City's relatively small size, communication is typically direct and immediate. As a result, gaps in program or service delivery are not the result of poor institutional structure or lack of intergovernmental cooperation, but rather due to shortcomings in available resources.

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

The City's Community Development Department maintains primary management and coordination of the various organizations involved in these processes. The staff within the Department work closely with other City departments and the community to develop programs and activities that improve low- and moderate- income neighborhoods throughout Norwalk. The administration of program activities includes housing, public facility and infrastructure improvements, public and social service activities, and economic development activities. The City collaborates with public agencies, for-profit agencies, and non-profit organizations in order to provide the aforementioned services.

In chapter 8 of the Fair Housing Action Plan of the AI report, it details the importance of regional collaboration. Many issues, such as homelessness, affordable housing, jobs-housing balance, and access to services are issues that require the collaboration between cities, the County, and nonprofit agencies throughout the region. In recent years, the County and the City of Los Angeles have undertaken multiple initiatives that address housing-related issues including first-time homebuyer programs, supportive and transitional housing, rental rehabilitation, and new construction of affordable housing. The City continues to rely on local and County social services to administer and provide valuable programs. The City collaborates annually with the Fair Housing Foundation (FHF) to conduct and react to any complaints surrounding housing discrimination and fair housing education and promotion.

Continuing these planning efforts and implementation would bridge the gap of disparities among communities. A majority of the Action Steps noted in the AI report require collaboration. The Public Engagement planning process for the AI and 5-Year Con Plan was based upon positive community-wide and agency support and participation. The City has created a solid foundation to continue work with its

area partners to create a path that initiates and completes the Plan's action steps.

**Discussion:**

See above.

## Program Specific Requirements

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

#### Introduction:

The City will receive HOME Grant funding of \$358,412 and CDBG Grant funding of \$1,117,591 for program year 2022.

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.

#### 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	100,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>100,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

Not applicable.

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:

1. In FY 2022/23, the City plans to complete a homebuyer assistance project. The guidelines for the program are contained in the City of Norwalk HOME Homebuyer Manual. The sales price may not exceed the median price for the area as approved by HUD. A portion of the HOME assistance will carry-over into a silent second or third Trust Deed loan for the homebuyer.

There is a 15-year resale restriction. After which, the homeowner will receive a 100% loan forgiveness. Prior to the completion of the 15 year period if the home is sold, transferred, refinanced or no longer owner-occupied, the City will recapture the remaining loan balance where there are sufficient funds from the net proceeds of the sale. The homeowner's down payment, principal payments, and capital improvements will be recovered by the homeowner first before the City recovers the remaining balance of the deferred loan. If the net proceeds are not sufficient to recapture the full HOME investment plus enable the homeowner to recover the amount of the homeowner's investment, the City will reduce the amount of HOME investment. Examples of the recapture provision are provided in the HOME Program Homebuyer Manual, 2020-2021.

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:

The property will have a 15-year resale restriction requiring that the home be resold to another low-income buyer (Below 80% AMI). Homeowners can expect to receive a fair return on investment upon resale during the affordability period. Fair return on investment is based on the percentage change in the area median income over the period of home ownership. Included in the calculation of fair return on investment is the homeowner's original investment (down payment, closing costs, and principal payments) and increase in market value attributable to major upgrades. Major upgrades include the addition of square footage, full remodel of kitchen and/or bathroom(s) and/or installation of solar panels. The value of the upgrade will be determined by the building permit valuation.

The City's loan and covenant will be assumed by any future buyers and the loan will remain in place indefinitely. During the 15-year resale restriction, recapture of the homebuyer assistance will be triggered if the homeowner no longer occupies the home, or the home is sold or transferred without

approval of the City. After the resale restriction has expired, the homebuyer assistance will be recaptured upon sale, transfer, or refinance.

The City intends to utilize their HOME Homebuyer Manual as an alternate method to presumption of affordability. This manual was included as an attachment in Norwalk's 2020-2021 Annual Action Plan.

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:

Not applicable.

Norwalk administers its HOME Homebuyer Manual, which establishes the City's policies and procedures for the First Time Homebuyer Program. A market analysis was completed for the FY 2020-2021 AAP and is attached in MA-15 section of the 2020-2025 Consolidated Plan. A market analysis shows home sales prices over a three-month period.

After review of the published 2022 HOME affordable homeownership limits provided by HUD, for Los Angeles County for determining 95 percent of the median purchase price limit, it was determined that the median price limit for City homes is \$600,000. For a newly constructed unit, the limit is \$497,240. Based on FHA standard practice, the following multipliers are used for two-, three-, and four-unit properties: 1.28, 1.55, and 1.92 times the 1-unit limit respectively. Based on a comparison of local housing market listing prices and sales information, it was determined that the FHA limits do not accurately reflect current actual home purchase prices for the area. Therefore, a local market survey was conducted for the City home sales for a three-month period using Movoto Home Sale data from January through March of 2022. The survey was used to reevaluate the 95% median value to have the most current data. The Market Analysis concluded that the City use the local market survey price as the determinant of the 95 percent median purchase price limit as it is higher than the FHA-Market Median Price. After evaluation the City determined that the Market Median Price for the City is at \$665,000.

Norwalk does complete a Market Analysis included as attachment C Grantee Unique Appendices as necessary based on the sales, enabling the City to raise the Maximum After Rehab Value for the HOME Program. Also, conducting routine market analysis helps capture the maximum sales price the City can use when purchasing a unit, selling a unit, or working with a CHDO for an affordable housing development project.