

Table of Contents

City of Sacramento Housing Element

APPENDIX H-7 | PROGRAM EVALUATION H-7-1

Tables

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs H-7-1

This page intentionally left blank.

APPENDIX H-7 | Program Evaluation

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
Program	Status	Evaluation	Recommendation
<p>1. The City shall revise its Mixed-Income Housing Ordinance to promote affordable housing citywide and will require:</p> <ul style="list-style-type: none"> 1) an affordable housing impact fee for all new housing units, and 2) large, single-family subdivisions to provide housing for a variety of incomes and family types. 	Complete/ Ongoing	From 2013-2014, City staff conducted outreach for the update of the Mixed income Housing Ordinance. The Mixed Income Housing Ordinance was adopted on September 1, 2015. The Mixed Income Housing Ordinance established a Housing Impact Fee (HIF) that is charged on certain residential developments. In 2019, the HIF fund grew by \$2,231,246, resulting in a new balance of \$ 4,394,201. In 2019 fund expenditures were directed towards the support of 18 units total amongst two projects (Arden Way Phase 2 and Capitol Park). The City also operates a Housing Trust Fund (HTF) fee for non-residential developments. In 2019, the HTF balance available for affordable housing projects grew by \$2,415,253, and was expended on 67 affordable units throughout 6 different projects.	Modify program. Gather input from the community on potential modifications to the Mixed Income Housing Ordinance
<p>2. The City shall update its residential design guidelines to include Crime Prevention through Environmental Design (CPTED) strategies.</p>	Complete	CPTED Guidelines were incorporated into the Central City Design Guidelines on April 19, 2018. The City integrated CPTED strategies into citywide residential design guidelines in June 2019.	This program has been completed and will be removed from the Housing Element.
<p>3. To ensure on-going safety and security, the City through SHRA will annually inspect SHRA financed multifamily projects for compliance with maintenance and social service requirements.</p>	Ongoing	SHRA's Portfolio Management Department is responsible for ensuring on-going compliance with funding requirements, maintenance and resident services in all SHRA funded projects. Prior to project approval, developers must have SHRA approval of a management company and management plan, appropriate security measures and financing plan to ensure on-going operations. In addition, all projects must submit a resident services plan prior to funding approval with appropriate on-site services provided at least 15 hours a week, depending upon the number of units. Annually, the portfolio management department physically inspects each property to ensure that Housing Quality Standards (HQS) are met, that resident services are being provided and that all required record-keeping is up to date. At SHRA's sole discretion, additional compliance audits can be performed.	This is a fundamental function of SHRA. Delete program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
4. The City shall provide Housing Choice Vouchers to very low- and extremely low-income Sacramento households in the City and County in order to continue to provide housing options to those most in need.	Complete/ Ongoing	<p>In 2103, SHRA, in its role as the Housing Authority for both the City and County of Sacramento, was authorized to administer approximately 11,890 Housing Choice Vouchers. Housing Choice Vouchers cover the portion of fair market rent above the tenant's share which is set at approximately 30% of their income. The average annual household income for the Housing Choice Vouchers was \$14,153. Due to the budget impact of sequestration in 2013, SHRA maintained an average lease up rate of 98.20% of available vouchers and used 100% of the available funding.</p> <p>In 2014, SHRA administered approximately 12,000 Housing Choice Vouchers. The average annual household income for the Housing Choice Vouchers was \$13,992.</p> <p>In 2015, SHRA administered approximately 11,984 Housing Choice Vouchers. The average annual income for the Housing Choice Vouchers was \$13,800.</p> <p>In 2016, SHRA administered approximately 12,000 Housing Choice Vouchers. The average annual income for the Housing Choice Vouchers was \$15,121.</p> <p>In 2017, SHRA administered approximately 12,000 Housing Choice Vouchers. The average annual income for the Housing Choice Vouchers was \$15,277.</p> <p>In 2018, SHRA administered approximately 12,000 Housing Choice Vouchers. The average annual income for the Housing Choice Vouchers was \$15,636.</p> <p>In 2019, SHRA administered approximately 12,000 Housing Choice Vouchers. The average annual household income for the Housing Choice Vouchers in 2019 was \$15,142.</p>	Modify program to focus on prioritizing vouchers as a resource for very low- and extremely low income residents.
5. Prepare a new Analysis of Impediments to Fair Housing Choice (AI) in order to assess the City's efforts at reducing housing discrimination and enforcing fair housing laws.	Complete/ Ongoing	In 2016, SHRA on behalf of the City of Sacramento and Unincorporated County of Sacramento (which includes the small cities of Folsom, Isleton and Galt) entered into partnership with the surrounding jurisdictions, including the cities of Woodland, Davis, Rocklin, Roseville, West Sacramento, Citrus Heights, Rancho Cordova, Elk Grove and the Housing Authorities of Sacramento,	Modify program to reflect new deadline and opportunities for regional collaboration

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
Program	Status	Evaluation	Recommendation
		Roseville/Rocklin and Yolo to complete a regional Assessment of Fair Housing (AFH). In 2017, both governing bodies authorized the extension of the current Analysis of Impediments to Fair Housing Choice (AI) to December 31, 2019 to allow time to develop the regional AFH. Federal law changed during 2018 requiring HUD grantees to return to the AI rather than submit an AFH. SHRA completed the multi-jurisdictional AI that included substantial community outreach and hundreds of completed housing-related surveys. This is a robust AI that will meet the requirements of the AFH if federal regulations change again. The AI was approved by the City Council on October 22, 2019.	
6. The City shall disseminate fair-housing information by making the information available in appropriate public locations and events, such as the public counter at the Community Development Department, community centers, City-sponsored events, and on SHRA's website. The Community Development Department shall work with other departments, such as Neighborhood Services and Parks and Recreation, and with services providers to disseminate fair housing information.	Ongoing	Continuing from the 2015 inception, SHRA in partnership with the City of Sacramento, County of Sacramento, and the Cities of Elk Grove, Citrus Heights, and Rancho Cordova continues to respond to resident concerns pertaining to fair housing assistance by seeking to identify the most appropriate resources to handle identified concerns. As a result of this effort, SHRA on behalf of the City and in partnership with the County entered into a Fair Housing contract with 1) Legal Services of Northern California (LSNC) and 2) Sacramento Self-Help Housing (SSH) with a subcontract relationship with Project Sentinel and the California Apartment Association (CAA) to provide a comprehensive Fair Housing program. The program includes a centralized Renter's Help Line with direct referrals to legal counsel that can pursue a full spectrum of remedies to prevent or rectify any fair housing concerns. Information on Fair Housing was also redistributed to community centers in 2018. In August 2019, the City also created a Tenant Protection Program to assist tenants with increasing rental rates by establishing limits on annual rents and providing protection for unjust evictions.	Modify program to expand on outreach and education strategies.
7. The City shall engage the Sacramento Area Council of Governments (SACOG) and other regional entities to develop a regional plan to pool local funding and staff capacity together in order to develop affordable, transit-oriented development (TOD) in key locations in the region.	Ongoing	In 2015, SHRA and the City completed coordination efforts with SACOG and other regional entities to develop a regional plan to pool local funding and staff capacity together in order to develop affordable TOD projects in key locations in the region. In 2017 and 2018 SHRA continued its partnership with SACOG to build	Modify program to reflect more specific infill-related actions. Combine with

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		upon the regional plan and effectively target the types of locations suited for catalytic public investment. Identifying the types of locations will allow for the sizing of necessary funding required to be better defined and will inform the effective targeting of resources. In 2018, SHRA coordinated with SACOG on the Twin Rivers TOD, receiving technical assistance for State Cap and Trade-funded programs. SHRA and the City participate in monthly TOD Collaborative meetings to ensure coordination on development opportunities in high impact areas. Starting in 2019, the City has partnered with SACOG to identify infrastructure needs in order to assist in their continued efforts to secure state funding to support infill infrastructure through the Green Means Go program proposal. In 2020 the City participated in the development of the SACOG Regional Transit-Oriented Development Action Plan.	Program 16.
8. Consistent with Government Code § 65863, the City shall consider the impacts of rezones and general plan amendments of residential sites on the City's ability to meet its share of the regional housing need.	Ongoing	All applications for rezones or general plan amendments continue to be evaluated in light of the City's ability to meet its share of the regional housing need. The City has an adequate sites inventory to accommodate the 2013-2021 RHNA period.	Retain program, but fold into a broader program related to maintaining an inventory of available sites. Combine with 9
9. The City shall maintain a land inventory for housing production which identifies priority housing sites.	Ongoing	The City, on a quarterly basis, determines if any land has been rezoned and updates the land inventory accordingly. The City has an adequate sites inventory to accommodate the 2013-2021 RHNA period.	Combine with 8
10. The City shall amend financing plans as needed to ensure that adequate funding is available to provide infrastructure improvements for new development. To ensure funding for large new developments, the City shall complete Mitigation Fee Act compliant finance plans for the 65 th Street area.	Complete	The Delta Shores, Railyards, 65th Street, and River District Finance Plans are complete. The 65th Street and River District Impact fees were adopted on February 14, 2017. The finance plan for the Central City Specific plan was adopted in April 2018. The West Broadway Specific Plan will include an accompanying public facilities funding strategy that is anticipated to be adopted in 2020.	Delete program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
11. The City shall develop a strategic investment plan to prioritize infrastructure financing consistent with the General Plan and focus funding in key infill areas.	In progress	In 2015, staff drafted a Strategic Investment Plan that identifies and ranks priority infrastructure projects that would serve as catalyst projects for development in Priority Investment Areas (PIAs). The PIAs are generally in the Central City, 65th Street Area, and the Cal Expo/Arden Arcade Area. This program was never formally adopted. The City has instead focused on developing local area finance plans that have area-specific finance strategies and priorities. In 2020, the City will apply for \$750,000 through the California Department of Housing and Community Development's (HCD's) Local Early Action Planning Grant to conduct infrastructure analysis and targeted studies to understand existing capacity and conditions and recommend infrastructure improvements in areas of the City that are being targeted for infill housing development in the 2040 General Plan and 2021-2029 Housing Element.	Replace with a program to conduct infrastructure analysis. Combine with Program 17.
12. The City shall review and update the City's Emergency Shelter Site inventory every three years to determine if the sites are adequate, accessible, appropriate, and developable. New shelters, land uses, and rezones shall be considered when updating the inventory. The new inventory shall be posted on the 2013-2021 Housing Element website.	In progress/ Ongoing	In 2018, the Mayor directed the City Council to identify shelter sites in each of the council districts to accommodate 100 beds for people experiencing homelessness. In August 2019, the City Council approved a Funding Plan that allocated funding to multiple new sheltering programs, including two new navigation centers, the interim re-use of a SRO motel, scattered site sheltering and multiple youth sheltering programs. In October 2019, the SHRA facilitated a discussion with City Council on a Five-Point Plan that suggested additional programs, including the provision of scattered sites, homeless overnight parking, sleeping cabins, motel conversion, pre-development funds, and permanent supportive housing funding. As a third supportive measure, in January 2020, the City Council declared a Shelter Crisis, which enables the City to shelter people experiencing homelessness in designated public facilities and to suspend certain housing, health, and safety standards. The City and SHRA have been actively identifying sites for emergency shelters and other Five-Point Plan strategies.	Replace with a program directed at new homeless initiatives.
13. The City shall prepare an annual report to the City Council on implementation of City housing programs and recommend revisions to the implementation strategies as appropriate.	Ongoing	The City reports to the City Council on the implementation of Housing Element and other General Plan programs every Spring and submits its Annual Progress Reports to HCD in April each year.	Delete program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
14. The City may assist non-profit organizations with predevelopment loans in conjunction with applications for permanent supportive housing.	Complete	SHRA continues to offer, in limited circumstances, predevelopment loans to non-profit organizations. In 2019, no predevelopment loans were awarded. SHRA resources for predevelopment can be limited due to program requirements.	Combine with broader program to support affordable housing development.
15. The City shall submit an annual report to the City Council that evaluates implementation of the General Plan and recommends appropriate revisions.	Ongoing	The City reports to the City Council on the implementation of Housing Element and other General Plan programs every Spring.	Delete program.
16. The City shall encourage and facilitate transit-oriented affordable housing development in key locations by maintaining a webpage with a map of sites in transit priority areas, near services/amenities for TCAC scoring, and/or sites owned by the former redevelopment agency. City Staff shall also conduct a seminar with affordable housing developers to discuss these priority sites as well as promote new development standards and programs that help facilitate affordable housing.	Ongoing	The City examined transit-oriented sites and conducted a workshop on Affordable Housing and sites in August of 2018. The City adopted a TOD ordinance to preserve TOD development opportunities citywide on December 11, 2018. The City works closely with SHRA, SACOG, and Sacramento Regional Transit (SacRT) to identify TOD sites and support projects that are most appropriate for grant funding such as the State's Affordable Housing and Sustainable Communities (AHSC) and Transformative Climate Communities. The City will also be utilizing SB 2 Planning Grant funds to develop a housing development toolkit illustrating the step-by-step development process and available incentives and programs to encourage and incentivize development in infill TOD areas. SB 2 funds will also be utilized to conduct a vacant lot analysis of both private and public parcels to develop targeted programs and strategies for developing affordable housing.	Retain program. Modify and combine with Program 7 to target infill specific activities.
17. The City shall encourage infill development by reducing barriers through infrastructure improvements and assistance to ensure that adequate infrastructure is in place to serve higher density and mixed-use development in key opportunity areas.	Ongoing	Community Development staff continues to work with other city departments to coordinate Capital Improvement Plan (CIP) funding in priority infill areas. This includes an annual review of the capital improvement program for consistency with the general plan. This consistency review is presented to the Planning and Design Commission. The Commission's findings of general pan consistency are then reported to the Council during the adoption of the capital improvement program. Through the Central City Specific Plan, an infrastructure analysis and financing plan was incorporated to reduce barriers for development and ensure adequate infrastructure for higher density uses is planned for in	Combine with Program 11 and Program 30 and modify program to reflect plans for infrastructure analysis and targeted studies.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		<p>the plan area. In 2019, the City participated in a preapplication process for infrastructure funding through SACOG's proposed Green Means Go grant program. In October 2019, City Council approved the use of Community Development Block Grant (CDBG) funds to prepare an infrastructure analysis and cost study for the Del Paso corridor to make it shovel ready and simulate development on vacant lots.</p> <p>In 2020, the City will apply for \$750,000 through HCD's Local Early Action Planning Grant to conduct infrastructure analysis and targeted studies to understand existing capacity and conditions and recommend infrastructure improvements in areas of the City that are being targeted for infill housing development in the 2040 General Plan and 2021-2029 Housing Element.</p>	
18. The City shall pursue grant funding, including the State Department of Housing and Community Development Housing-Related Parks Program, Community Design Grant Program, and other revenue sources to provide critical amenities/services in infill areas to promote complete neighborhoods.	Ongoing	The City was awarded several multi-year grants which allowed for park improvements. See evaluation of Program 23 for more information on grant funding.	Modify program to pursue new funding resources. Combine with Program 23.
19. The City shall issue waivers for sewer and sanitation development fees for projects in which at least 10 percent are affordable to very low-income households.	Complete	On October 30, 2018, the City Council passed a resolution reducing certain development impact fee residential rates for new affordable dwelling units to a zero-dollar rate for building permit applications accepted on or after December 30, 2018.	Delete program.
20. The City shall use sewer credits to assist with infill and affordable housing.	Ongoing	<p>In 2002, Regional County Sanitation District issued sewer credits to jurisdictions with the intention of promoting economic development within the region, initially with no sunset date. In 2006, a new agreement was outlined that would sunset the program on December 31, 2020. These credits were issued as a result of the District purchasing unused capacity from two industrial customers between 1999 and 2002. Therefore, this program will cease to exist on the designated sunset date.</p> <p>The City of Sacramento has approximately 452 sewer credits remaining. At one time, the City had close to 8,900 sewer credits to be awarded primarily towards job creating projects. Starting in</p>	Delete program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		late 2017, projects were prioritized by their job creation potential. The last 452 sewer credits have been earmarked primarily towards projects with direct job creation ability. Several sewer credit applications have been turned down due to the limited number of credits remaining. The intent of the sewer credit program is to assist economic development projects that result in a large number of jobs being produced. The City's last remaining sewer credits will be utilized in the intended fashion.	
21. The City shall provide water development fee waivers to residential infill projects.	Ongoing	In 2019, the City issued 290 water development fee waivers. Of this total, there were 264 issued for single-family/duplex projects and 26 waivers issued for multi-family development projects. Water development impact fees are covered by the City's resolution approved by City Council on October 30, 2018 that allows zero-dollar rate impact fees for affordable housing.	Replace with a broader program addressing fees.
22. Through the TOD Collaborative, the City shall coordinate with SACOG, Sacramento County, SHRA and other Agencies to develop funding sources and strategies to develop housing near transit.	Ongoing	<p>SHRA was the recipient of a Sustainable Communities Initiative Challenge Grant that focused on the development of a business plan to support Equitable Transit Oriented Development (eTOD). As part of the grant, SHRA convened an eTOD Collaborative made up of regional partners (SACOG, SacRT, nonprofits, philanthropic organizations, lenders, and higher education) that meet as needed. The business plan was created in 2014 and SHRA and its partners have been transitioning to implementation. The Collaborative developed the parameters for new funding sources and strategies to develop housing near transit and is moving towards the development of an implementation plan.</p> <p>In 2018, SHRA worked with SACOG and other stakeholders on the Urban Land Institute Advisory Services Panel that focused on Equitable TOD in South Sacramento. SHRA provided technical assistance regarding available resources for housing around two transit stations in South Sacramento.</p> <p>Also, in 2018, SHRA, in partnership with the City, SacRT, numerous nonprofits and resident groups, was awarded a Transformative Climate Communities grant from the Strategic Growth Council (SGC). The \$23 million award will fund the creation of a light rail station and related improvements on the</p>	Combine with Program 7.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
Program	Status	Evaluation	Recommendation
		<p>Blue Line at North 12th Street and Sproule Avenue, as well as urban greening and mobility enhancements for residents. The Dos Rios Light Rail Station will be located across North 12th Street from the redeveloped Twin Rivers Housing Project.</p> <p>In 2019 SHRA and its developer received an AHSC award of \$18,793,015 in support of the Twin Rivers redevelopment project including expanded bus services, installation of new bike lanes and sidewalks, crosswalk enhancements, and ADA compliant bus stops.</p>	
<p>23. The City shall apply for new and existing Federal, State and local funding sources, such as Proposition 1C funds, HELP, Building Equity and Growth in Neighborhoods Program (BEGIN), and Mental Health Services Act (MHSA).</p>	Ongoing	<p>In 2013, SHRA funded the rehabilitation of the historic Ridgeway Studios (22 units) which leveraged tax credits and other financial assistance.</p> <p>In 2014 SHRA funded new construction or rehabilitation of 700 Block of K (137 units), Curtis Park Village Senior (91 units), Sierra Vista Senior (78 units), Sutterview Senior (77 units) and Woodhaven Senior Apartments (104 units). These projects collectively leveraged bonds, tax credits, and other financial assistance. The Curtis Park Village Senior development also received Proposition 1C funds. SHRA has one active BEGIN award for the City of Sacramento. The State of California did not publish a Notice of Funding Availability (NOFA) for the BEGIN Program in 2014. SHRA received an allocation of \$11.3 million in Mortgage Credit Certificates for the County of Sacramento, which will result in approximately 45 additional homeowners throughout the City of Sacramento.</p> <p>In 2015 SHRA funded the rehabilitation of Land Park Woods (75 units) which leveraged tax credits and other financing assistance. SHRA was the recipient of a \$30 million Choice Neighborhoods Initiative (CNI) Grant from HUD to be used for revitalizing and integrating the Twin Rivers public housing project into a mixed income development; this CNI Grant will leverage tax credits and other financing assistance.</p> <p>In 2016 SHRA continues to offer federal, state and local funding to increase the supply of affordable housing.</p> <p>In 2017 SHRA funded the new construction of the mixed-income</p>	<p>Modify program to reflect new funding resources.</p>

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		<p>and mixed-use 800 Block of K development (148 units consisting of 30 affordable units). SHRA applied to HCD for \$14 million in AHSC Program funds and \$35 million in SGC Transformative Climate Communities Program for the Twin Rivers development. These projects collectively leveraged bonds, tax credits, and other financial assistance.</p> <p>In 2018, SHRA applied for and received \$23 million in State funding to support the Twin Rivers TOD. Funds will be used to complete a new light rail station to connect an isolated neighborhood just north of downtown to services and job centers. A portion of that funding will also support the first phase of public housing replacement at the Twin Rivers community directly across the street from the planned light rail station. SHRA also applied for National Housing Trust Funds from the State to support the construction of Twin Rivers but was unsuccessful. SHRA continues to track legislation and potential funding resources from the State such as the new SB 2 funds.</p> <p>In 2019 SHRA received authority from the City of Sacramento to administer the State’s new Permanent Local Housing Allocation. In coordination with the County of Sacramento, SHRA applied to the State’s No Place Like Home program on behalf of Capitol Park Hotel which was awarded approximately \$7 million for conversion of the single-room-occupancy hotel into permanent supportive housing. SHRA and the housing developer applied for and was awarded \$18,793,015 in AHSC funds for the redevelopment of Twin Rivers. The Twin Rivers project was also selected for the Department of Developmental Services Multi-Family Housing Project and will receive \$1.5 million towards construction and will set aside 15 units for special needs.</p>	
<p>24. The City shall convene a working group made up of building industry and affordable housing experts to explore new funding sources for affordable housing, such as former redevelopment (boomerang) funds. City staff shall make recommendations to the City Council based on the working group meetings.</p>	Complete	<p>In April of 2017, the City Council conducted a workshop to discuss new funding sources for affordable housing. Workshop participants included representatives from the Sacramento Housing Alliance, the North State Building Industry Association, Sacramento Mutual Housing, and the Sacramento Association of Realtors.</p>	<p>Modify program to reflect the ongoing role of the established working group.</p>

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
<p>25. The City shall support applications for Tax Exempt Mortgage Revenue Bonds, Low Income Housing Tax Credits (LIHTC), State of California Multifamily Housing Program, other federal and state programs and local funding sources to assist affordable housing programs and projects. The SHRA website and Multifamily Lending guidelines include an inventory of available funding sources.</p>	Ongoing	<p>In 2014, SHRA supported two projects that submitted applications for 9 percent LIHTCs: Curtis Park Village Senior (91 units) and Sutterview Senior Apartments (77 units). Additionally, SHRA supported three projects that submitted applications for 4 percent LIHTCs: 700 Block of K (137 units), Sierra Vista Senior (78 units) and Woodhaven Senior Apartments (104 units).</p> <p>In 2015, SHRA supported one project that submitted an application for 9 percent LIHTC: Land Park Woods (75 units).</p> <p>In 2016, SHRA supported one project that submitted an application for Tax Exempt Mortgage Revenue Bonds and 4 percent LIHTC: Pensione K (127 units).</p> <p>In 2017, SHRA supported three projects that submitted an application for 9 percent LIHTCs: Shasta Hotel (79 units), St. Francis Terrace (48 units) and Village Park (50 units). Additionally, SHRA supported two projects that submitted an application for Tax Exempt Mortgage Revenue Bonds and 4 percent LIHTCs: Bel-Vue (22 units) and 800 Block of K (148 units).</p> <p>In 2018, SHRA committed funds to Victory Townhomes (21 units), Dixianne Apartments (55 units) and Norwood Annex (15 units) to recapitalize and prolong the useful life of these affordable housing developments. These projects are also supported by bonds and tax credits.</p> <p>2019: SHRA committed funds to Arden Way (120 units), Metro at 7th (85 units) which are proposed new construction projects. SHRA also committed funds to rehabilitate Whispering Pines (96 units). All projects will also compete for tax exempt bonds, LIHTCs, and State-administered programs.</p>	<p>Modify to include within a broader program to support affordable housing development.</p>
<p>26. The City shall streamline the Housing Trust Fund Ordinance to apply the fees equally throughout the City and modify aspects of the ordinance that have proven to be ineffective over the years.</p>	Complete	<p>The Housing Trust Fund Ordinance was updated and adopted on February 14, 2017.</p>	<p>Delete program.</p>

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
27. Each year the City shall evaluate the effectiveness of its development process streamlining efforts in order to ensure a high level of customer service.	Ongoing	City staff are working to implement the City Council approved Housing Streamlining Menu of Options that contains 50+ actions to streamline housing production, many actions of which specifically target planning approval streamlining. Staff work with internal and external housing working groups to implement these actions. Planning staff work with an internal housing working group to implement these actions. The Housing Policy Manager is also conducting quarterly meetings with the External Housing Policy Working Group that will review and weigh in on local housing policy and initiatives. These groups are comprised of affordable housing experts, members of the Measure U and Inclusive Economic Development Committees, building industry members, housing and accessibility advocates, the faith-based community, and other housing stakeholders.	Replace with new streamlining program to reduce uncertainty in permitting process.
28. The City shall continue to implement the preliminary review process whereby City staff and neighborhood groups provide comments and advise the applicant of policy and technical areas that need to be addressed prior to the formal application review. This is an existing program that helps to identify planning and community issues early in the process so that problems can be identified and addressed and processing time is shortened.	Discontinued	Developers have indicated that the preliminary review process and associated fees have increased overall entitlement review time and costs. The City instead continues to encourage preapplication meetings with staff and early neighborhood outreach by applicants. Projects that require a director or council approval are noticed to all surrounding properties within 300 feet of the project. Additionally, any organization that wishes to be notified about additional types of projects taking place anywhere in the city may be placed on a routing list upon request.	Delete program.
29. The City shall work with SAFCA and other responsible agencies to achieve increases in flood protection to the City and surrounding areas so that City and other land use agencies can proceed with development plans and meet Federal Emergency Management Agency (FEMA) and State requirements for flood protection in 100-year and 200-year flood plains, respectively. Actions include: (1) finishing Folsom Dam spillway modifications, and supporting and implementing subsequent raising of Folsom Dam; (2) finishing construction of improvements along the perimeter levee system protecting Natomas; (3) accomplishing improvements needed to meet FEMA levee accreditation requirements for lands in the Sacramento area protected by levees; and (4) supporting development and implementation	Ongoing	Sacramento Area Flood Control Agency (SAFCA), with the support of the City of Sacramento, Sacramento County, American River Flood Control District and Reclamation District 1000, and in cooperation with the U.S. Army Corps of Engineers (USACE), U.S. Bureau of Reclamation (USBR), the Central Valley Flood Protection Board (CVFPB) and State Department of Water Resources (DWR), is working toward progressively increasing the level of flood protection in the Sacramento area to at least 200-year urban level of flood protection from major rivers and streams. A new auxiliary spillway on Folsom Dam by USBR and USACE, in cooperation with CVFPB and SAFCA, was completed in 2017. The new auxiliary spillway improves the ability to manage large flood events by allowing more water to be safely released earlier	Modify program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
Program	Status	Evaluation	Recommendation
<p>of plans for progressively improving the level of flood protection in Sacramento area to 200-year urban level of protection. The City shall monitor flood risk in the city and, in 2017, shall analyze the impact of flooding on the City's ability to accommodate its share of the regional housing needs. If flooding is found to impact the City's ability to accommodate the remaining RHNA, the City shall strive to identify additional sites with residential development capacity that are not impacted by flood risk. The City shall report the findings of analysis to HCD in the 2017 Housing Element Annual Progress Report.</p>		<p>in a storm event and leaving more storage capacity in the reservoir to hold back the peak inflow when it arrives, thus providing increased flood protection for properties in the American River floodplain. As of January 2020, construction has begun to raise Folsom Dam up to 3.5 feet. This USACE project is expected to be completed in 2025 and will increase flood storage capacity and further improve the ability to manage large flood events.</p> <p>Substantial improvements to Natomas levees have been constructed by SAFCA in cooperation with the State under DWR's Early Implementation Program. Further improvements to achieve 100-year and subsequently 200-year levels of flood protection for Natomas area were authorized in the Water Resources Reform and Development Act (WRRDA) of 2014 (Public Law 113-121, June 2014). With passage of WRRDA, Natomas became eligible for an A99 Zone designation, and on June 16, 2015, the City obtained a new flood insurance rate map to provide Natomas with an A99 flood zone designation. With WRRDA, USACE is taking the lead on completion of remaining components of Natomas levee improvement work. Funds were appropriated in the Fiscal Year 2018 and 2019 budget, and actions are proceeding for design and construction work. Construction of multiple reaches in Natomas began in July 2019. With these actions, Natomas homeowners are able to maintain flood insurance rates at preferred risk policy levels, and these rates will continue if levee improvements continue to be made.</p> <p>For areas of northern and southern Sacramento outside of Natomas, USACE actions resulted in the expiration of its levee certifications for FEMA's flood insurance program. SAFCA has evaluated the levee systems protecting portions of northern and southern Sacramento and determine that some further improvements to the levees are required to meet criteria established by FEMA for levee accreditation for the National Flood Insurance Program. In July 2015, SAFCA filed The Final Environmental Impact Report (FEIR) for the North Sacramento Streams, Sacramento River East Levee, Lower American River, and Related Flood Improvements Project, also referred to as the Levee Accreditation Project. SAFCA's schedule is for certification</p>	

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		<p>of various reaches of the levee systems surrounding Sacramento between 2016 and 2025 after accomplishment of needed improvement work in various reaches of levee systems. FEMA flood zones remain unchanged and currently there is no schedule for FEMA to remap the flood zones in the Sacramento area.</p> <p>In January 2016, USACE filed the American River Watershed Common Features General Reevaluation Report (GRR) with the Assistant Secretary of the Army. This report authorizes projects for improvements to flood control systems around the Sacramento area. This work is integral for achieving Urban Level of Protection for the Sacramento area. All projects in the GRR were fully-funded in an appropriation bill in July 2018. The work is expected to be completed by 2024.</p>	
30. The City shall prepare a study recommending new financing options to provide for infrastructure in infill areas. New sources of financing could include state and federal grants, the General Fund, the use of impact fees, bond measures, and financing sources.	Ongoing	Finance plans such as the Central City Specific Plan have a discussion on new financing options. Many of these options require further exploration. In 2019, the City established the Sacramento Stadium Area Enhanced Infrastructure Financing District (EIFD) and adopted the Sacramento Stadium Area EIFD Infrastructure Financing Plan (Plan). The City's Office of Innovation and Economic Development continues to explore the use of Enhanced Infrastructure Financing Districts. The City has also been pursuing infrastructure funding by supporting SACOG's proposed Green Means Go grant program. In 2020, the City will apply for \$750,000 through HCD's Local Early Action Planning Grant to conduct infrastructure analysis and targeted studies to understand existing capacity and conditions and recommend infrastructure improvements in areas of the City that are being targeted for infill housing development in the 2040 General Plan and 2021-2029 Housing Element.	Combine with program 17 and modify.
31. The City shall implement the Asset Repositioning of the City's public housing units through acquisition and rehabilitating Housing Authority properties. These activities will be implemented through a joint venture between the nonprofit organization established by the Housing Authority and an established non-profit developer. Projects will utilize a combination of mortgage revenue bonds, LIHTCs, and gap financing from SHRA's funding resources to ensure no net	Complete	As a result of on-going reductions in capital and operating funding from HUD, the City adopted the Asset Repositioning Study in July 2007. This study set the stage for the implementation of a proactive strategy to "reposition" SHRA's public housing units to reduce dependence on HUD and eliminate capital and operating deficits. One of the guiding principles of this strategy was a "no net loss" policy.	Retain program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
loss of extremely low-income units.			
32. The City shall continue to implement the Single Room Occupancy (SRO) ordinance, ensuring no net loss of Downtown SRO units and providing funding and other resources for the rehabilitation of existing SRO units and the construction of new SRO units in the City.	Ongoing	In 2014 the Marshall Hotel (95 SRO units) closed in compliance with the SRO Ordinance. The units were replaced at 7th & H Street Housing Community. Also, in 2014, the renovations of 22 units were completed at Ridgeway Studios (formerly Ridgeway Hotel).	Retain program.
33. The City shall use available housing resources, including project based rental subsidies, such as local Housing Choice Vouchers, federal Housing Assistance Payment vouchers, and state Mental Health Services Act Vouchers for the provision of housing for extremely low-income households.	Ongoing	SHRA continues to be committed to assisting extremely low-income households with vouchers as they become available. In 2019, SHRA issued a Request for Proposal (RFP) to affordable housing developers and committed to providing 70 vouchers to Metro at 7th located in the City of Sacramento.	Modify and combine with Program 4 to reflect operating subsidy programs.
34. The City shall continue to provide assistance to senior affordable housing projects.	Ongoing	SHRA continues to support new construction and rehabilitation of senior apartments throughout the City. In 2014, the Agency approved funding for Curtis Park Village Senior (91 units) a construction project in the former Curtis Park Railyards, and the rehabilitation of Sierra Vista (78 units) and Sutterview (77 units) Senior Apartments located in Central City.	Replace with a more specific program to address senior housing needs.
35. Over the next five years, the City shall work with service providers to improve linkages between emergency shelters, transitional housing and supportive services.	Ongoing	In 2017, the City established the Whole Person Care program also known as Pathways to Health + Home. This a four-year pilot to improve the health, quality of life, and housing stability for the City's most vulnerable individuals experiencing, or at-risk of experiencing, homelessness. Led by the City, the program brings together local hospitals, community clinics, health plans, homeless services and housing providers, first responders, and community-based organizations to create an integrated system of care. The program is the cornerstone of the City's commitment to housing 2,000 homeless individuals by 2020. As of March 15, 2020, Pathways had 905 individuals enrolled and had served a total of 1,923 individuals through the life of the program. A total of 182,334 services, including outreach, navigation, care coordination, and housing support, have been provided to the community. Additionally, Pathways has helped house a total of 612 individuals. Pathways is collaborating with over 20 health care, housing, and social service providers to ensure continuity of	Replace with a program directed at new homeless initiatives.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		care for program enrollees.	
36. The City shall provide funding and other resources for permanent supportive housing located both in leased units and affordable housing developments.	Ongoing	<p>SHRA contracted with Volunteers of America (VOA) for the Emergency Solutions Grant (ESG) funded Rapid Re-Housing Program and emergency shelter program.</p> <p>In 2014 using ESG-funding, 222 persons received emergency shelter assistance and 182 households were rapidly re-housed. SHRA provided rental subsidy funding for 93 permanent supportive housing units served by Lutheran Social Services (LSS), Transitional Living and Community Support (TLCS) and VOA service providers.</p> <p>In 2015 using ESG-funding, 307 persons received emergency shelter assistance and 150 households were rapidly re-housed. SHRA provided rental subsidy funding for 93 permanent supportive housing units served by LSS, TLCS and VOA service providers.</p> <p>In 2016, using ESG-funding, 355 persons received emergency shelter assistance and 244 households were rapidly re-housed. SHRA provided rental subsidy funding for 130 permanent supportive housing units served by LSS, TLCS and VOA service providers.</p> <p>In 2017 HUD revised the reporting mechanism for ESG accomplishments. Using ESG-funding, an estimated 150 persons received emergency shelter assistance and were rapidly rehoused and served by LSS, TLCS and VOA service providers.</p> <p>In 2018 the City of Sacramento provided rapid re-housing services to 114 households and the County of Sacramento provided 81, for a total of 195.</p> <p>In 2019, the City of Sacramento provided rapid re-housing services to 49 households and the County of Sacramento provided 81, for a total of 130.</p>	Replace with a program directed at new homeless initiatives.
37. The City shall implement the Ten-Year Plan to End Chronic Homelessness, including the “Housing First” strategy. Focuses of the “Housing First” strategy include:	Ongoing	Sacramento Steps Forward, SHRA, and the Sacramento Continuum of Care (CoC) providers worked to submit Sacramento’s application for HUD’s Homeless Services NOFA	Replace with a program directed at new homeless

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
Program	Status	Evaluation	Recommendation
<ul style="list-style-type: none"> Providing support for permanent housing that offers disabled homeless individuals a home without expecting them to have resolved their addictions or mental health problems. Providing supportive services and treatment in such housing to assist tenants return to health and ability to stay housed. 		<p>that began to reallocate funding within the CoC to further support the “Housing First” model. An additional Rapid Rehousing (RRH) program was brought online as a result of this reallocation. Likewise, SHRA continued to support the provision of services as part of Permanent Supportive Housing.</p> <p>HUD announced on January 11, 2017 that the CoC had been awarded \$20,180,083 to fund 31 programs that serve people experiencing homelessness. This is an increase of \$668,245 over the previous year’s award and a \$5.2 million increase since Sacramento Steps Forward took over as the CoC lead agency in 2011. The award renews funding for 22 Permanent Supportive Housing programs and in doing so, retains housing and supportive services for people who were previously homeless. Without this funding, these individuals would likely return to a state of homelessness. It also renews funding for four Rapid Rehousing programs. HUD funded four new projects this year including two Permanent Supportive Housing programs operated by Sacramento Self Help Housing, one Permanent Supportive Housing program run by TLCS and a new Transitional Housing/Rapid Re-Housing project operated by TLCS and Wind Youth Services. Two awards were granted to Sacramento Steps Forward to administer the Homeless Management Information System and a planning grant, which covers the cost of the Point-in-Time count, among other programs.</p> <p>In 2017, the City established the Whole Person Care program also known as Pathways to Health + Home. This a four-year pilot to improve the health, quality of life, and housing stability for the City’s most vulnerable individuals experiencing, or at-risk of experiencing, homelessness. Led by the City, the program brings together local hospitals, community clinics, health plans, homeless services and housing providers, first responders, and community-based organizations to create an integrated system of care. The program is the cornerstone of the City’s commitment to housing 2,000 homeless individuals by 2020. As of March 15, 2020, Pathways had 905 individuals enrolled and had served a total of 1,923 individuals through the life of the program. A total of</p>	<p>initiatives.</p>

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		182,334 services, including outreach, navigation, care coordination, and housing support, have been provided to the community. Additionally, Pathways has helped house a total of 612 individuals. Pathways is collaborating with over 20 health care, housing, and social service providers to ensure continuity of care for program enrollees.	
38. Through the McGeorge School of Law Mediation Center, the City shall provide fair housing assistance and dispute resolution services in order to resolve tenant and neighborhood conflicts.	Ongoing	<p>SHRA on behalf of the City and in partnership with the County entered into a Fair Housing contract with 1) LSNC and 2) SSHH with a subcontract relationship with Project Sentinel and CAA to provide a comprehensive Fair Housing program (program began in 2015). The program includes a centralized Renters' Help Line with direct referrals to legal counsel that can pursue a full spectrum of remedies to prevent or rectify any fair housing concerns.</p> <p>Summary of 2019 accomplishments:</p> <p>SSHH Renter's Help Line received 3,719 calls from City residents, and referred to its subcontractor Project Sentinel, 229 fair housing related cases from City residents with 61 dispute resolutions completed. The Renter's Help Line referred 122 City residents to the CAA of Sacramento Valley. 49 fair housing presentations were completed in the City by SSHH and Project Sentinel.</p> <p>SHRA provided three fair housing trainings with SSHH and Project Sentinel across Sacramento County and provided fair housing assistance materials to landlords.</p> <p>LSNC attorney assigned to this project conducted more than 1,650 fair housing intakes and provided 14 community presentations throughout the County of Sacramento. These intakes resulted in the following: two affirmative fair housing advocacy cases; 18 fair housing cases resolved without litigation; 5 fair housing unlawful detainer represented/settled; 70 counsel/advice on fair housing.</p>	Modify program to fold into broader fair housing program/tenant protections. (combine with Programs 38 and 6)
39. The City shall encourage the preservation of regulated affordable rental developments that are converting to market	Ongoing	SHRA continues to offer funding to preserve at-risk projects. Twin Rivers, the 218-unit obsolete public housing development will be	Retain program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
<p>rate. The City will continue to implement the City's Preservation Ordinance, which requires notification to SHRA of proposed conversion of affordable units, and allows SHRA priority to work with affordable developers to preserve such projects. SHRA shall continue to provide financial assistance, as available, and technical assistance, as needed to aid in the preservation of at-risk units, and shall reach out to non-profit and other affordable housing developers that have the capacity to preserve at-risk units. In addition, the City will ensure compliance with the "no net loss" provisions of the adopted Housing Authority Repositioning Strategy, ensuring that, during rehabilitation and revitalization of public housing properties, there is no net loss of units affordable to extremely low income families.</p>		<p>replaced with a new higher density mixed-use, mixed income community. Public housing units will be replaced one-for-one within the larger community to preserve affordable housing and increase economic opportunities with the addition of low income and market rate units. SHRA provided relocation assistance for residents relocating from the site along with significant supportive services. Residents of the current Twin Rivers community are guaranteed a right to return if the residents remain lease-compliant. The City Council approved the Revised Multifamily Lending and Mortgage Revenue Bond Policies in December, 2019 which reaffirms that preservation of affordable housing at-risk of converting to market rate remains the City's number one priority for funding.</p>	
<p>40. The City and SHRA shall seek to preserve, convert, and/or rehabilitate privately owned multifamily rental housing to assure its ongoing affordability for lower-income residents.</p>	Ongoing	<p>In 2014, SHRA provided financing and rehabilitation began on the Woodhaven (104 units), Sierra Vista (78 units) and Sutterview Senior Apartments (77 units). The completed units will be affordable to very low- and low-income tenants.</p>	Retain program.
<p>41. The City shall continue to implement the citywide Rental Housing Inspection Program (RHIP) where building inspectors inspect rental properties for interior and exterior code violations and issue corrective notices.</p>	Ongoing	<p>RHIP, entering its 11th year, continues to inspect newly registered rental properties and perform random audit inspections of existing, self-certified rental properties.</p>	Retain program.
<p>42. The City shall modify the Condominium Conversion Ordinance to make the process and regulations clearer to staff, applicants, and affected tenants, while maintaining a similar level of oversight in order to avoid adverse impacts to the rental stock and tenants.</p>	Incomplete	<p>The City has not received an application to convert apartments into condominiums in more than three years. The recently adopted Central City Specific Plan has a policy discouraging the conversion of Class B and C apartments into condominiums.</p>	Retain program.
<p>43. The City shall continue to apply for homebuyer assistance programs from HCD, the California Housing Finance Agency and the California Debt Limit Allocation Committee. These programs currently include the following: CalHome First-time Homebuyer Mortgage Assistance Program, BEGIN, and Mortgage Credit Certificate Program (MCC).</p>	Ongoing	<p>In 2013, SHRA provided down payment assistance in the City to 27 households using the BEGIN and CalHome First-Time Homebuyer programs, and additionally provided MCCs to 15 homebuyers in the City.</p> <p>In 2014, SHRA provided down payment assistance in the City to 27 households using the BEGIN and CalHome First-Time Homebuyer programs, and additionally provided MCCs to 4 homebuyers in the City. SHRA received an allocation of \$11.3 million in Mortgage Credit Certificates for the County of</p>	Retain program.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
		<p>Sacramento, which will result in approximately 45 additional homeowners throughout the City of Sacramento.</p> <p>In 2015, SHRA provided down payment assistance in the City to 33 households using the BEGIN and CalHome First-time Homebuyer programs, and additionally provided MCCs to 17 homebuyers in the City.</p> <p>In 2016, SHRA provided down payment assistance in the City to 30 households using the BEGIN and CalHome First-time Homebuyer programs, and additionally provided MCCs to 21 homebuyers in the City. SHRA received a new allocation of \$15.2 million in Mortgage Credit Certificates for the County of Sacramento, which will result in approximately 47 additional homeowners throughout the City of Sacramento.</p> <p>In 2017, SHRA provided down payment assistance in the City to 11 households using the CalHome First-Time Homebuyer program, and additionally provided MCCs to 20 homebuyers in the City. SHRA received a new allocation of \$9.5 million in Mortgage Credit Certificates for the County of Sacramento, which will result in approximately 25 homeowners throughout the City of Sacramento.</p> <p>In 2018, SHRA provided down payment assistance in the City to 17 households using the CalHome First-Time Homebuyer program, and additionally provided Mortgage Credit Certificates to 17 homebuyers in the City.</p> <p>In 2019, SHRA provided down payment assistance in the City to 13 households using the CalHome First-Time Homebuyer program, and additionally provided MCCs to 33 homebuyers in the City.</p>	
44. The City shall provide grants for low- and very low- income residents with grants for emergency repairs and/or accessibility modifications to their homes.	Ongoing	Between 2015-2019 this program assisted 770 households with emergency repairs or accessibility modifications. In the beginning of 2015 SHRA transitioned the program from Rebuilding Together back to the Agency. 2016 was the first full year the program was operated out of SHRA.	Retain program and combine with Program 34.
45. The City shall establish a fee deferral program for affordable housing to defer fees to certificate of occupancy, recognizing	Ongoing	The Fee Deferral Ordinance was adopted in 2017 and extended for an additional 2 years on December 11, 2018. The scope was	Reflect as an ongoing policy.

Table H 7-1 Evaluation of 2013-2021 City of Sacramento Housing Element Programs			
<i>Program</i>	<i>Status</i>	<i>Evaluation</i>	<i>Recommendation</i>
the complexities and time needed to complete an affordable housing development.		expanded to include commercial projects with a project valuation of \$1 million or more. The City intends to extend this ordinance in 2021.	
46. The City shall establish a Responsible Banking Ordinance that would require banks that receive City deposits to report mortgage lending practices, small business lending, and other investments in the community. The ordinance shall in no way restrict the investment activities of the City Treasurer or the Administration, Investment and Fiscal Management Board.	Incomplete	Recent court decisions have limited the legal authority of local governments to regulate banks, thus challenging the constitutionality of responsible banking ordinances. Additionally, despite the proposed revamping of the Community Reinvestment Act that could affect how regulated banks meet the credit needs of local communities, the City's Treasury Office will continue to take steps toward strengthening its RFP requirements by requesting information from banking partners to include criteria pertinent to responsible banking. The specific RFP requirements are yet to be determined.	Delete program.
47. The City shall work with the Alta Regional Center to implement an outreach program that informs families within the City on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services on the City's website, and providing housing-related training for individuals/families through workshops.	Ongoing	This program was not implemented during the previous planning period. The City will engage with representatives working with persons with disabilities to develop new programs.	Delete program.

This page intentionally left blank.