

Springfield, Illinois  
Annual Action Plan  
  
For Program Year 2024  
Amended as of January 9, 2026

# **Executive Summary**

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

### **1. Introduction**

The City of Springfield receives annual grant allocations from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). The overarching purpose of the CDBG and HOME programs is to assist **low- and moderate-income** families and households, which are those that earn less than 80% of the area median income. The funds are used to pursue three goals:

1. Provide decent, affordable housing
2. Create suitable living environments, and
3. Expand economic opportunities.

In order to access these federal funds, the City must carry out a planning process to identify the scope of housing and community development needs in its jurisdiction and how the available funding can best be used to meet those needs. This document, the City's Program Year 2024 Annual Action Plan, summarizes the City's proposed actions to administer these funding sources for the period of July 1, 2024, to June 30, 2025. The contents of the plan are guided by the federal regulations set forth by HUD in 24 CFR Part 91.

Due to delays in the congressional appropriation, the original draft of this plan included an estimate of the funding allocation. HUD officially announced the PY2024 allocation amounts and they have been adjusted to reflect the actual allocations. The original amounts were adjusted based on the difference between the estimated and actual allocation. The funds budgeted to Lead Service Line Replacements have been reallocated to Public Facilities until the City receives acknowledgement from HUD that the program as designed is eligible for CDBG.

### **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.

After reviewing and analyzing the data gathered through the consultation, citizen outreach, needs assessment, and market analysis, the City developed a set of goals and strategies to make the best use of its limited resources to address its most pressing affordable housing, community development, and homeless problems. The City developed eight broad goals to meet its most pressing needs. The City expects most of the available funds to flow into CDBG-eligible areas, which are those where at least fifty one percent of the residents have incomes below 80% of the area median income.

## COVID RESPONSE

The City received additional funding (“CV Funds”) in the 2020 program year to prepare for, prevent, and respond to the COVID-19 pandemic and related effects on the community. The City submitted substantial amendments to its prior planning documents outlining the use of those funding sources. During this program year, the City expects to use the remaining CV funding to prepare for, prevent, and respond to the effects of the coronavirus pandemic.

## **HOME ARP**

The City recently completed its HOME-ARP Cost Allocation Plan and will begin to implement HOME-ARP funded activities during the program year. Additional details on HOME-ARP can be found in the HOME-ARP Cost Allocation Plan on the City’s website.

### **Additional Narrative**

#### **(1) Improve Condition of Existing Housing Stock**

The City estimates it will assist 60 owner-occupied units with necessary repair and modifications. This will include rehabilitation to address emergency situations that threaten the health and safety of the occupants, code violations, and accessibility issues for disabled persons.

- HOME Deferred Loan Rehabilitation Program: \$200,000 HOME
- Home Repair Program: \$250,000 CDBG
- Program Delivery: Carry over CDBG
- SCIL Disability Ramp Installations: Carry over CDBG

#### **(2) Create New Affordable Housing**

The City will set aside \$795,795 of HOME funds for the development of new affordable housing. In addition, \$84,450 of HOME funds for the development of housing undertaken by Community Housing Development Organizations (CHDOs). The City expects to use \$50,000 of the CHDO set-aside for a proposed project by Growth International.

- HOME Affordable Housing Development: \$787,517 HOME
- CHDO set-aside Funds: \$82,676 HOME

#### **(3) Increase Homeownership**

Homeownership is a traditional path for households to build equity and wealth and to invest in their community. The City is working with a non-profit partner to convert scattered site rental properties into homeownership units for the existing low-income tenants.

- LMI Down Payment Assistance: \$75,000 CDBG

#### (4) Eliminate Blighted Conditions

The City proposed to use \$650,000 of CDBG funding for demolition of blighted structures during this program year. The City has identified two large properties that may need CDBG assistance. In addition, the City will continue to identify single family homes that cause blight within its communities as targets for clearance.

- Demolition: \$650,000 CDBG

### **Additional Narrative 2**

#### (5) Improve Neighborhood Infrastructure and Public Facilities

In 2024, the City will provide CDBG funds to Be Neighbors for the development of a Resource Center in a new residential veteran community. The City will also subsidize the rehabilitation of the Phoenix Center. The City has set aside an additional amount of CDBG funds for additional facility improvements that have yet to be identified.

- Be Neighbors Veterans Resource Center: \$400,000 CDBG
- Phoenix Center: \$40,000 CDBG
- Public Facilities To Be Determined: \$ 486,111 CDBG

#### (6) Improve Public Services

The City will support various public services aimed at providing a more suitable living environment for residents of CDBG-eligible target neighborhoods and other low-income clientele, such as seniors, homeless, disabled populations, and youth. The City estimates a total of 1,270 persons will be assisted under this goal.

- Neighborhood Clean Ups for low-income Areas: \$50,000 CDBG
- Goodwill: \$50,000 CDBG
- Compass for Kids \$41,600
- Public Services To Be Determined: \$58,400 CDBG

#### (7) Planning, Administration, and Capacity Building

The City will use a portion of its CDBG and HOME allocation to comply with the planning, administration, and reporting requirements of the federal funding sources. Funds will also be used to support and provide technical assistance to local community partners, including non-profit housing developers certified as Community Housing Development Organizations (CHDOs).

- CDBG Planning and Administration: \$200,000 CDBG
- HOME Planning and Administration: \$55,118 HOME
- Eastside Housing Study: \$40,000 CDBG
- CHDO Operating Subsidy: \$27,559 HOME

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

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

The City has assisted in the development of a number of large affordable housing projects in recent years, including the redevelopment of Poplar Place, the development of 40 scattered site rental units, and the development of 24 units of permanent supportive housing.

On the other hand, some HUD-funded projects have not met their proposed goals. A number of the City's rehabilitation programs have faced setbacks such as a lack of contractors.

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

Summary from citizen participation section of plan.

The City followed its normal public participation process for the 2024 Action Plan. The City will continue to accept comments after the close of the public comment period to better inform future programming. Any comments received before submission will be summarized and included in the plan. A complete draft of the Consolidated Plan is available for public review and comment on the City's website at [www.springfield.il.us](http://www.springfield.il.us) .

Persons interested in commenting on this document should send written comments to the following address:

Office of Planning & Economic Development

ATTN: HUD Comments, 800 E. Monroe, Suite 107

Springfield IL 62701

or by email to [info.OPED@springfield.IL.US](mailto:info.OPED@springfield.IL.US)

The City conducted a Public Hearing on May 06, 2024 at City of Springfield Municipal Center West, Council Chambers, Room 301 (3rd floor) 300 S. 7th Street Springfield, IL 62701. The purpose of the hearing was to receive comments from citizens regarding the City's proposed Draft FFY 2024 Action Plan. Interested agencies, groups, organizations and individuals, particularly low-income persons and those representing low-income neighborhoods, are urged to attend the hearing.

Information about the Draft Action Plan may be obtained on normal workdays, Monday through Friday, between the hours of 8:00 a.m. and 4:00 p.m. at the Office of Planning and Economic Development, Municipal Center East, 800 East Monroe, Room 107. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call the Office of Planning and Economic Development, at (217) 789-2377 to make those arrangements, or for the hearing impaired call City Clerk at (217)789-2216.

Cualquier persona que no habla Inglés que deseen asistir a la audiencia pública deben comunicarse cinco (5) días calendario antes de la reunión y un intérprete de lenguaje se proporcionará.

**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.

No public comments received.

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

No public comments received.

**7. Summary**

Not applicable.

## **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.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	SPRINGFIELD	Office of Planning and Economic Development
HOME Administrator	SPRINGFIELD	Office of Planning and Economic Development

**Table 1 – Responsible Agencies**

### **Narrative (optional)**

### **Consolidated Plan Public Contact Information**

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

### **1. Introduction**

When developing the Consolidated Plan for the 2020 program year, the City reached out to local service providers and other government agencies to gather information on housing, homeless, and community development needs and to determine how the available federal resources should best be used to meet the City's priority needs.

At this time, the City also sought to build better working relationships with service providers in the spirit of increasing coordination between the City's efforts and those of the service providers. This section summarizes the consultation efforts made by the City and details specific information required by HUD in regard to coordination on homeless efforts.

The City has adopted a Citizen Participation Plan (CPP) that outlines the City's policies and procedures for obtaining public input in the planning and decision-making processes associated with the HUD grants.

The City recently completed its HOME-ARP Cost Allocation Plan that included a significant amount of consultation with local stakeholders who address the needs of homelessness and those at risk of homelessness.

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

In each consultation, the City gathered information on local needs, current and planned initiatives, and sought ways to leverage available funding to maximize benefits. These discussions provided an opportunity for the service providers and agencies to discuss their program offerings, learn about other programs available in the community, and identify common issues and problems. The City used this opportunity to provide limited technical assistance to these agencies and information on the federal programs.

The City works closely with the Heartland Continuum of Care (see below) and Springfield Housing Authority (SHA), which is the largest affordable housing provider in the area. The City has consulted the SHA on projects in the past and will continue to support SHA's efforts to expand the supply of affordable housing stock within the area.

In addition, the City participates in a number of ongoing local and regional coordination efforts throughout the program year. The City also conducted Ward Strategic Planning meetings and maintains several commissions to provide on-going discussion and coordination among citizens and stakeholders,

including the Community Relations Commission, the Disabilities Commission, the Economic Development Commission, and Veterans Advisory Council.

Lastly, the City plays a key role in local and regional economic development efforts, including the potential expansion of the state universities into the downtown district. Recently the City renewed the Enos Park TIF and extended boundaries and renewed the Eastside and SHA Tax Increment Finance Districts to provided additional financial resources for housing and business development.

**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 Heartland Continuum of Care (CoC) is a collaborative effort of service providers in the area focused on providing services to the homeless and near homeless populations in the area. The City partners with the CoC and its member organizations in a number of areas, including strategic planning and program delivery. The City supported the CoC in its efforts to adopt a new strategic Heartland Housed plan and used much of the new plan as a basis for its 2.3 million HOME ARP allocation. The City also provides financial assistance to a number of CoC member agencies to address the needs of homeless persons, including operational support for a low-barrier overflow shelter and the funding of street outreach.

**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 of Springfield does not receive ESG funds directly from HUD. Local agencies may apply for ESG through Sangamon County and the State of Illinois. The City will provide a Certificate of Consistency for any homeless agency that proposes a plan that is consistent with the goals and objectives outlined within this plan.

**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>	SPRINGFIELD HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	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>	
2	<b>Agency/Group/Organization</b>	Habitat for Humanity of Sangamon County
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty 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>	
3	<b>Agency/Group/Organization</b>	GROWTH INTERNATIONAL
	<b>Agency/Group/Organization Type</b>	Housing Services - 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>	

4	Agency/Group/Organization	Nehemiah Expansion, Inc.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
5	Agency/Group/Organization	Enos Park Neighborhood Improvement Association
	Agency/Group/Organization Type	Housing Services - Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

6	<b>Agency/Group/Organization</b>	Heartland Continuum of Care
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing Services - Victims Planning organization
	<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 Anti-poverty 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>	

7	<b>Agency/Group/Organization</b>	Helping Hands
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty 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>	

8	<b>Agency/Group/Organization</b>	MERCY Communities
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty 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>	

9	<b>Agency/Group/Organization</b>	<b>FIFTH STREET RENAISSANCE</b>
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis Anti-poverty 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>	

10	<b>Agency/Group/Organization</b>	Phoenix Center
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth 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>	

11	<b>Agency/Group/Organization</b>	THE SALVATION ARMY - SPRINGFIELD
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Anti-poverty 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>	

12	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	SCIL  Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	<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>	
13	<b>Agency/Group/Organization</b> <b>Agency/Group/Organization Type</b>	Springfield ARC Endowment Fund, Inc.  Housing Services - Housing Services-Persons with Disabilities
	<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>	

14	<b>Agency/Group/Organization</b>	Area Agency on Aging for Lincolnland, Inc.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs community development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
15	<b>Agency/Group/Organization</b>	The Outlet
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Needs - Unaccompanied youth Anti-poverty Strategy community development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

16	<b>Agency/Group/Organization</b>	United way of Central Illinois
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Foundation

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty 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>	
17	<b>Agency/Group/Organization</b>	BOYS AND GIRLS CLUBS OF CENTRAL ILLINOIS
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy community development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

18	<b>Agency/Group/Organization</b>	SIU School of Medicine
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Publicly Funded Institution/System of Care
	<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>	
19	<b>Agency/Group/Organization</b>	SPRINGFIELD BLACK CHAMBER OF COMMERCE
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Service-Fair Housing Business Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development community development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
20	<b>Agency/Group/Organization</b>	SPRINGFIELD
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Health Agency Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Publicly Funded Institution/System of Care Other government - Local Planning organization Civic Leaders Grantee Department

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment          Homeless Needs - Chronically homeless          Homeless Needs - Families with children          Homelessness Needs - Veterans          Homelessness Needs - Unaccompanied youth          Homelessness Strategy          Non-Homeless Special Needs          Market Analysis          Economic Development          Anti-poverty Strategy          Lead-based Paint Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	

21	<b>Agency/Group/Organization</b>	SANGAMON COUNTY
	<b>Agency/Group/Organization Type</b>	Services-Health Services-Education Services-Employment Health Agency Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - County Regional organization Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Lead-based Paint Strategy community development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

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

The City completed additional consultations, but the IDIS Online system continues to prevent the City from adding the organizations to the list above. Consultations not listed above include

- Illinois Department of Public Health

- Capitol Area Association of Realtors
- One in a Million
- Springfield NAACP
- Springfield Urban League
- Springfield Sangamon Growth Alliance

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Heartland CoC	The CoC formulates the priorities for local homeless funding. The City's homeless goals within this plan are based largely on those of the CoC.
2017-2037 Comprehensive Plan	City of Springfield	The Comprehensive Plan provides a vision of future growth and development over the next twenty years, especially for planning sector 7, and informed this plan's overall goals and objectives in the near term (5 years).
HUD 2019 Comprehensive Market Analysis	HUD	This market analysis provided detailed data on supply and demand for both owner and rental housing and informed how the City's proposed housing programs will perform in the current market.
Housing Needs Assessment	Downtown Springfield Inc	The market analysis conducted as part of this needs assessment provides the rationale for the housing development goals with this plan.
ALICE in Illinois	United Way	The needs assessment of low-income residents in Sangamon County influenced the priority needs and goals related to non-housing community development.
2019 Sangamon County Survey	Community Foundation for the Land of Lincoln	The survey results provided information on resident views related to needs within the community.

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

**Narrative (optional)**

As described above, the City actively seeks to coordinate with all service providers and stakeholders working in the areas of affordable housing, economic and community development. This includes various commissions, the Continuum of Care, and partnerships with assisted housing providers such as the Springfield Housing Authority.

One entity noted that they felt more communication in regard to funding decisions was needed going forward as well as the development of longer term, multi-year goals supported by longer-term funding agreements rather than annual cycles. The City will make efforts going forward to better communicate funding allocations and rationale.

## 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

The City follows its adopted Citizen Participation Plan (CPP) to solicit public input during the planning process. This includes holding a number of public meetings and hearings, publishing public notice of opportunities to participate, and publishing the plan for a period of thirty days for review. The City will accept comments outside of the public comment period to better inform the use of its funds.

A complete draft of Annual Plan is available for public review. Physical copies of the plan will be available at the Lincoln Library, the City Clerk's office, the City Office of Planning & Economic Development, and the Sangamon County Health Department at 2833 S Grand Avenue.

Persons interested in commenting on this document should send written comments to the following address: Office of Planning & Economic Development, ATTN: HUD Comments, 800 E. Monroe, Suite 107 Springfield, IL 62701 or by email to [info.OPED@springfield.il.us](mailto:info.OPED@springfield.il.us) The City will consider all views and comments.

The City will hold a public hearing on May 6, 2024, to receive public comments and feedback on the plan.

The hearing will be held at City of Springfield Municipal Center West, Council Chambers, Room 301 (3rd floor) 300 S. 7th Street Springfield, IL 62701. The purpose of the hearing is to receive comments from citizens regarding the City's proposed **Draft** FFY 2024 Action Plan. Interested agencies, groups, organizations and individuals, particularly low-income persons and those representing low-income neighborhoods, are urged to attend this hearing.

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## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Non-targeted/broad community	May 6 Public Hearing	no comments received. Two questions were asked. See attachment for details	no comments received	
2	Newspaper Ad	Non-targeted/broad community	Public notice of hearing and public comment period. Comment period April 25 - May 24	No Comments received		

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

The main source of funding for the goals, programs, and projects discussed in this Consolidated Plan will come from the Community Development Block Grant (CDBG) and the HOME Investment Partnerships Program (HOME). The actual allocation for (HOME) is \$551,175.30. This screen is reflecting a rounded amount.

#### Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) funds received by the City can be used for a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and improved community facilities and services, provided that the activities primarily benefit low- and moderate-income residents. Some examples of how the CDBG funds can be used include:

- Housing development and rehabilitation for income-eligible homeowners,
- Down payment assistance for homebuyers' social service programs for youth and seniors,
- clearance and demolition of blighted structures, and
- Infrastructure improvements in income-eligible areas.
- Economic Development Business assistance to be leveraged with other local resources.

#### HOME ARP Funds (HOME-ARP)

HOME-ARP funds can be used to provide housing and housing stability services to four qualifying populations, including homeless, at-risk of homelessness, victims of domestic violence and trafficking, and other households facing housing instability. A portion of funding can also assist low-income renter households. The City recently completed its HOME-ARP Cost Allocation Plan and will begin to implement HOME-ARP funded

programs. More detail on the use of HOME ARP funds can be found in the Cost Allocation Plan on the City's website.

#### HOME Investment Partnerships Program (HOME)

The HOME Investment Partnerships Program (HOME) funds received by the City must be used for affordable housing projects. Beneficiaries of HOME-funded projects must earn less than eighty percent of the area median income. Eligible types of activities include:

- Development of new affordable housing,
- Down payment assistance for income-eligible buyers,
- Acquisition/Rehabilitation/Resale of owner housing,
- Rehabilitation of existing affordable owner-occupied or rental housing, and
- Tenant-based rental assistance.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,369,488.00	0.00	971,623.00	2,341,111.00	0.00	see narrative above

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	551,175.30	0.00	601,695.00	1,152,870.30	0.00	see narrative above

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 recently received supplemental funding from HUD's Office of Lead Hazard Control and Healthy Homes for the remediation of lead-based paint and Healthy Home hazards. This Grant is leveraged with \$250,000 in CDBG funds and general revenue funds.

The City expects to leverage and attract additional funding sources to help meet its goals. Potential sources include Tax Increment Financing (TIF), homeless funds from the Continuum of Care and the State of Illinois, and private funding invested in the HOME-assisted affordable housing developments.

As a recipient of HOME funds, HUD requires the City of Springfield to contribute local funds as match to establish affordable, standard housing for low-income households. This match must equal at least 25% of HOME project costs expended. The City will require developers participating in HOME-funded projects to contribute match dollar or invest in infrastructure directly related to the HOME-funded project as match. The City has maintained vacant properties that can be used for redevelopment and may also utilize corporate or other local funds as sources of match.

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

The City has a significant inventory of vacant lots scattered throughout many of its neighborhoods that are available for redevelopment. The City has demolished over 400 blighted and deteriorated buildings to facilitate the re-use of these properties. In the previous year, the City offered approximately 200 vacant lots for sale.

The City is holding approximately 100 lots for the Neighborhood of Hope revitalization project which will be used in conjunction with the Bloomberg/Harvard whole block initiative.

**Discussion**

The following balances from prior program years are being reprogrammed based on the determination that they are no longer needed for the originally budgeted purpose, or the program has been cancelled.

Sources of Prior Year Resources for CDBG:

CDBG Administration (200,000)

Whole Block Revitalization (100,000)

Program Delivery (240,000)

SCIL Ramps 2021 and 2022 (67,000)

2021 and 2023 Public Services (85,000)

UCP Acquisition and Rehab (224,000)

Demolition (50,000)

Balances from completed activities and program income (6,623)

Sources of Prior Year Resources for HOME:

Home Rehab Program Deferred Loans (469,786.08)

HOME Admin and CHDO Operations (131,908)

## 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	Improve Condition of Housing Stock	2020	2024	Affordable Housing	CDBG Target Area Citywide	Affordable Housing	CDBG: \$250,000.00 HOME: \$200,000.00	Homeowner Housing Rehabilitated: 29 Household Housing Unit
2	Create New Affordable Housing	2020	2024	Affordable Housing	CDBG Target Area Citywide	Affordable Housing	HOME: \$870,194.30	Rental units constructed: 6 Household Housing Unit
3	Increase Homeownership	2020	2024	Affordable Housing	CDBG Target Area Citywide	Affordable Housing	CDBG: \$75,000.00	Direct Financial Assistance to Homebuyers: 3 Households Assisted
4	Eliminate Blighted Conditions	2020	2024	Non-Housing Community Development	CDBG Target Area Citywide	Non-housing Community Development	CDBG: \$650,000.00	Buildings Demolished: 2 Buildings
6	Improve Neighborhood Infrastructure and Facilities	2020	2024	Non-Housing Community Development	CDBG Target Area Citywide	Non-Homeless Special Needs Non-housing Community Development	CDBG: \$926,111.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1150 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Improve Public Services	2020	2024	Homeless Non-Housing Community Development	CDBG Target Area Citywide	Non-housing Community Development	CDBG: \$200,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 1270 Persons Assisted
8	Planning, Administration, and Capacity Building	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG Target Area Citywide	Affordable Housing Homelessness Non-Homeless Special Needs Non-housing Community Development Public Housing	CDBG: \$240,000.00 HOME: \$82,676.00	Other: 1 Other
9	Increase Economic Opportunity	2020	2024	Non-Housing Community Development	CDBG Target Area	Non-housing Community Development	CDBG: \$577,200.00	Jobs created/retained: 5 Jobs

Table 6 – Goals Summary

## Goal Descriptions

1	Goal Name	Improve Condition of Housing Stock
	Goal Description	The City will use available federal resources to support multiple rehabilitation programs, including Deferred Loan Program, Emergency Home Repair, Lead Abatement, and a Ramp Program. This may include comprehensive rehabilitation programs or programs targeted to address a specific issue or clientele. This includes but is not limited to major, emergency, and minor repair programs and accessibility improvements for seniors and disabled populations.

<b>2</b>	<b>Goal Name</b>	Create New Affordable Housing
	<b>Goal Description</b>	The City will use available federal resources to subsidize the development of new affordable housing units within the City. Eligible projects may include new construction or the acquisition and rehabilitation of existing properties. Housing may be rental or homebuyer. The City may provide support to tenant- based rental assistance programs with the goal of making existing, market rate rental properties affordable to low- and moderate-income populations. The amount of HOME funds will actually be \$870,194.30. The 30 cents is missing from the total, because the number was rounded.
<b>3</b>	<b>Goal Name</b>	Increase Homeownership
	<b>Goal Description</b>	Homeownership is a traditional path for households to build equity and wealth and to invest in their community. The City is working with a non-profit housing partner to transfer the ownership of existing scattered site rental units to the existing tenants.
<b>4</b>	<b>Goal Name</b>	Eliminate Blighted Conditions
	<b>Goal Description</b>	The City proposes to use \$650,000 of CDBG for the removal and clearance of blighted structures. The clearance of the Pillsbury property, which was funded in prior years, will occur in this program year as well. The City has identified two large properties that may be cleared and expects to use the remaining funds on single family homes that are contributing blight to their neighborhoods.
<b>6</b>	<b>Goal Name</b>	Improve Neighborhood Infrastructure and Facilities
	<b>Goal Description</b>	The City will use available federal resources to subsidize the rehabilitation or development of neighborhood facilities and infrastructure. This includes facilities designed to serve neighborhoods and those designed to serve specific populations, such as the homeless, seniors, or persons with disabilities and youth. Potential infrastructure projects include broadband, streets, sidewalks, flood drainage, water lines, and sanitary sewer improvements.
<b>7</b>	<b>Goal Name</b>	Improve Public Services
	<b>Goal Description</b>	The City will use available federal resources to support non-profit services whose primary purpose is to benefit low- and moderate-income persons. Services include those that serve low-income persons in general as well as those that target specific populations, such as at-risk youth, seniors, homeless, and those at risk of homelessness. They also include programs aimed at increasing access to economic opportunity, such as job training and supportive services, and improving community health, such as programs that increase access to health care, mental health, and healthy food.

8	<b>Goal Name</b>	Planning, Administration, and Capacity Building
	<b>Goal Description</b>	The City will use available federal funds to comply with the planning, administrative, and reporting requirements associated with the HUD grants. A portion of funds may be granted to non-profit housing developers actively working within the City to cover a portion of their operating costs. This goal includes actions to affirmatively further fair housing, conduct neighborhood planning efforts, and increase capacity of local stakeholders through technical assistance to all CDBG and HOME funded projects.
9	<b>Goal Name</b>	Increase Economic Opportunity
	<b>Goal Description</b>	The City plans to demolish the blighted former Salvation Army that is contaminated with hazardous lead and asbestos and jeopardizes the health and safety of the community. The lot will be sold to a business with the goal of job creation in the underserved area.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City proposes to administer the projects described below. The amount of (HOME) funds is \$1,152,870.30. The total amount of HOME funds for Affordable Housing Development is \$787,517.30

#### Projects

#	Project Name
2	Minor and Emergency Housing Repair
3	HOME Deferred Loan Housing Rehabilitation Program (HDL)
4	CHDO Housing Development
5	Affordable Housing Development
6	LMI Down Payment Assistance
7	Demolition / Economic Development
9	Public Facilities and Infrastructure
10	Be Neighbors Resource Center
11	Phoenix Center
12	Public Services
13	Neighborhood Cleanup for low-income Areas
14	Goodwill
15	Compass for Kids
16	Eastside Housing Study
17	CHDO Operating Costs
18	HOME Administration
19	CDBG Administration

Table 7 - Project Information

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

The City selected projects to fund based on its priority needs and goals outlined in its five year Consolidated Plan. The City continues to see a need for additional affordable housing and the rehabilitation of existing affordable housing stock, ongoing support for public services, public facilities, and infrastructure projects that primarily serve low income populations, and redevelopment efforts that remove barriers to investment in the City.

## **AP-38 Project Summary**

### **Project Summary Information**

1	<b>Project Name</b>	Minor and Emergency Housing Repair
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Improve Condition of Housing Stock
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$250,000.00
	<b>Description</b>	Fund the emergency correction of building code deficiencies and other minor repairs of single-family dwellings.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 units
	<b>Location Description</b>	citywide
	<b>Planned Activities</b>	Owner Occupied Housing Rehabilitation: 24 CFR 570.202 Low Mod Housing 570.208(a)(3)
2	<b>Project Name</b>	HOME Deferred Loan Housing Rehabilitation Program (HDL)
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Improve Condition of Housing Stock
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$200,000.00
	<b>Description</b>	The City will use available HOME funds to fund the moderate rehabilitation of approximately 4 single family dwelling units owned by qualifying low- and moderate-income families or individuals with a zero percent, deferred, forgivable loan; principally within low income census tracts.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 units
	<b>Location Description</b>	citywide with a focus on CDBG areas
	<b>Planned Activities</b>	Eligibility: HOME Single-Family, Owner-Occupied Rehabilitation

<b>3</b>	<b>Project Name</b>	CHDO Housing Development
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Create New Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$82,676.00
	<b>Description</b>	The City use funds to acquire vacant in-fill lots and substandard units in order to produce single family homes for low- and moderate-income homebuyers.
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 units
	<b>Location Description</b>	To Be Determined
	<b>Planned Activities</b>	Acquisition and Rehabilitation (Reconstruction)
<b>4</b>	<b>Project Name</b>	Affordable Housing Development
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Create New Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$787,517.30
	<b>Description</b>	Fund the rehabilitation/construction costs for affordable rental and homeowner units that will offer housing to low/moderate income persons. Total is 787,517.30
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	4 units
	<b>Location Description</b>	To Be Determined
	<b>Planned Activities</b>	HOME New Construction
	<b>Project Name</b>	LMI Down Payment Assistance

<b>5</b>	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Increase Homeownership
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$75,000.00
	<b>Description</b>	The City will work a non-profit partner to assist the transfer of existing scattered site rental units to the current low income tenant.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	3 homebuyers
	<b>Location Description</b>	CDBG Target Areas
	<b>Planned Activities</b>	Low Mod Housing (LMH) Direct Homebuyer Assistance (13)
	<b>Project Name</b>	Demolition / Economic Development
<b>6</b>	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Eliminate Blighted Conditions Increase Economic Opportunity
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$650,000.00
	<b>Description</b>	Funds will be used to demolish and clear properties that have blighting influences on their neighborhoods.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 blighted properties 5 jobs to be created
	<b>Location Description</b>	Pillsbury and sites to be determined
	<b>Planned Activities</b>	Slum Blight Spot (SBS) and/or Low Mod Jobs (LMJ) Clearance (04)
	<b>Project Name</b>	Public Facilities and Infrastructure
<b>7</b>	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Improve Neighborhood Infrastructure and Facilities

	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$486,111.00
	<b>Description</b>	Specific improvements have yet to be determined. Projects could include the development of new facilities, improvements of existing facilities, or the improvement of infrastructure to improve health and safety that will benefit persons located in low- and moderate-income census tracts.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,000 persons
	<b>Location Description</b>	to be determined
	<b>Planned Activities</b>	Public Facilities and Improvements: 24 CFR 570.201(c) Low Mod Area 570.208(a)(1) or Limited Clientele 570.208(a)(2)
<b>8</b>	<b>Project Name</b>	Be Neighbors Resource Center
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Neighborhood Infrastructure and Facilities
	<b>Needs Addressed</b>	Non-Homeless Special Needs Non-housing Community Development
	<b>Funding</b>	CDBG: \$400,000.00
	<b>Description</b>	Funds will be used to build a community center to provide supportive services to veterans living in the Be Neighbors housing development.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 persons
	<b>Location Description</b>	2835 Stanton St. Springfield, IL 62703
	<b>Planned Activities</b>	Public Facilities and Improvements: 24 CFR 570.201(c) Low Mod Area 570.208(a)(1) or Limited Clientele 570.208(a)(2)
<b>9</b>	<b>Project Name</b>	Phoenix Center
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Improve Neighborhood Infrastructure and Facilities

	<b>Needs Addressed</b>	Non-Homeless Special Needs
	<b>Funding</b>	CDBG: \$40,000.00
	<b>Description</b>	Funds will be used to make needed improvements to the Phoenix Center, a facility that provides counseling, health services, and transitional housing to at-risk persons.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 persons
	<b>Location Description</b>	109 E Lawrence Ave, Springfield, IL 62704
	<b>Planned Activities</b>	Public Facilities and Improvements: 24 CFR 570.201(c) Limited Clientele 570.208(a)(2)
10	<b>Project Name</b>	Public Services
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Improve Public Services
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$58,400.00
	<b>Description</b>	Provide support to nonprofit agencies and organizations that primarily serve homeless, non-homeless special needs populations, and other low- and moderate-income populations to increase the scope and quality of their services.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	100 persons
	<b>Location Description</b>	to be determined
	<b>Planned Activities</b>	Eligibility: CDBG Public Services (24 CFR 570.201(e)) National Objective: Limited Clientele (LMC)
11	<b>Project Name</b>	Neighborhood Cleanup for low-income Areas
	<b>Target Area</b>	CDBG Target Area

	<b>Goals Supported</b>	Improve Public Services
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$50,000.00
	<b>Description</b>	Providing dumpster service in low income areas to help clean up the neighborhood. This activity will be scheduled and is planned to occur three times in the next year.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,000 persons
	<b>Location Description</b>	cdbg target areas
	<b>Planned Activities</b>	Eligibility: CDBG Public Services (24 CFR 570.201(e)) National Objective: Low Mod Area (LMA)
12	<b>Project Name</b>	Goodwill
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Improve Public Services
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$50,000.00
	<b>Description</b>	Funds will be used to subsidize Goodwill programs that benefit low and moderate income residents.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	45 persons
	<b>Location Description</b>	2001 Wabash Ave, Springfield, IL 62704
	<b>Planned Activities</b>	Eligibility: CDBG Public Services (24 CFR 570.201(e)) National Objective: Limited Clientele (LMC)
13	<b>Project Name</b>	Compass for Kids
	<b>Target Area</b>	CDBG Target Area Citywide

	<b>Goals Supported</b>	Improve Public Services
	<b>Needs Addressed</b>	Non-housing Community Development
	<b>Funding</b>	CDBG: \$41,600.00
	<b>Description</b>	Funds will be used to subsidize Compass for Kids programs that benefit low and moderate income residents.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	125 persons
	<b>Location Description</b>	1201 S Fourth St, Springfield, IL
	<b>Planned Activities</b>	Eligibility: CDBG Public Services (24 CFR 570.201(e)) National Objective: Limited Clientele (LMC)
14	<b>Project Name</b>	Eastside Housing Study
	<b>Target Area</b>	CDBG Target Area
	<b>Goals Supported</b>	Planning, Administration, and Capacity Building
	<b>Needs Addressed</b>	Affordable Housing Non-housing Community Development
	<b>Funding</b>	CDBG: \$40,000.00
	<b>Description</b>	Funds will subsidize the development of a housing study to support affordable housing and neighborhood reinvestment for neighborhoods in the eastern portion of Springfield.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable for planning activities.
	<b>Location Description</b>	Not applicable for planning activities.
	<b>Planned Activities</b>	Planning (20) National Objective not applicable
15	<b>Project Name</b>	CHDO Operating Costs
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Create New Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing

	<b>Funding</b>	HOME: \$27,559.00
	<b>Description</b>	Funds will be provided to certified Community Housing Development (CHDO) organizations to increase the capacity to develop affordable housing within the City. Funds will be used to subsidize the operating costs of these organizations.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1 organization
	<b>Location Description</b>	to be determined
	<b>Planned Activities</b>	HOME – CHDO Operations
16	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Planning, Administration, and Capacity Building
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$55,118.00
	<b>Description</b>	Funds will be used to support planning, administration, and oversight of federally funded projects.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable
	<b>Location Description</b>	Not applicable
	<b>Planned Activities</b>	HOME Admin
17	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	CDBG Target Area Citywide
	<b>Goals Supported</b>	Planning, Administration, and Capacity Building

	<b>Needs Addressed</b>	Affordable Housing Homelessness Non-Homeless Special Needs Non-housing Community Development Public Housing
	<b>Funding</b>	CDBG: \$200,000.00
	<b>Description</b>	Funds will be used to support planning, administration, and oversight of federally funded projects.
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	not applicable
	<b>Location Description</b>	not applicable
	<b>Planned Activities</b>	General Administration (21A) National Objective not applicable

## 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

Low- and moderate-income areas are those where more than 51% of the population has a household income less than 80% of the area median income. Under the CDBG program, these areas qualify for projects that serve neighborhood needs, such as parks, community centers, and infrastructure improvements. In previous Consolidated Plans, the City chose to focus its resources in these areas.

Using the most recent HUD data available based on the 2011-2015 5-Year ACS, the City reviewed concentrations of low- and moderate-income households by census block group. Of the 131 block groups wholly or partly within the City, sixty-four qualify as low-moderate income, ranging from a low of 51.8% to 97.6%. A low-moderate income map and corresponding data is included below.

During the planning process, three specific areas were identified as potential target areas for project funding: the Eastside, the downtown, and the former site of the Pillsbury Mills plan. The Pillsbury project was funded in the 2023 program year, but will begin this program year.

### Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Area	13
Citywide	87

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The City has opted not to adopt any FORMAL geographic allocation priorities. Projects are mostly selected based on merits other than geography. For activities that meet a low mod area national objective, the City is limited to serving areas where at least 51% of the residents are considered low or moderate income.

### Discussion

Not applicable.

## Affordable Housing

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

#### Introduction

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	10
Special-Needs	0
Total	10

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	0
The Production of New Units	6
Rehab of Existing Units	4
Acquisition of Existing Units	0
Total	10

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

#### Discussion

Only the HOME-eligible goals are included in the table above. The City is also using CDBG for Minor and Emergency Housing, Disability Ramps, and Lead Abatement that is not included in the numbers above.

HOME Deferred Loan 200,000: 4 units

HOME New Development 787,517: 4 units

HOME CHDO 82,676: 2 units

#### CDBG

Minor; Emergency Repair, and Restoration (CDBG) 250,000: 25 units

SCIL Ramps (CDBG) 47,465: 6 units

Lead Abatement (CDBG) Prior year

CDBG Down Payment 75,000: 3 units



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

### **Introduction**

The Springfield Housing Authority (SHA) has a total of 3,245 units of affordable housing that includes 799 public housing units and 2,446 Housing Choice Vouchers (also known as Section 8 vouchers). SHA operates ten developments that primarily consist of scattered site units across the city. SHA is the largest affordable housing provider in the area. As such, it is important for the City to consider the efforts and strategies of the housing authority, even though this plan does not include public housing funds and the City has limited ability to use its housing funds on public housing developments.

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

The Springfield Housing Authority will pursue additional housing choice vouchers targeted towards persons experiencing homelessness as well as general vouchers targeted towards individuals and families. In addition, the Springfield Housing Authority will pursue 9% and 4% tax credit opportunities as well as Federal Home Loan Bank Affordable Housing Program (AHP) funds for the construction of new affordable housing family units. The Springfield Housing Authority will continue to work with its Continuum of Care in meeting the affordable housing needs of diverse populations. Faith based, Not for Profit and other community-based partnerships will be forged to leverage resources for the purposes of expanding affordable housing for single persons, families, and senior citizens. The Springfield Housing Authority will partner with it's not for profit, Capital City Coalition in the acquisition and rehabilitation of existing units within the community.

With the pandemic and the increasing need for additional affordable housing, the City and the SHA are exploring ways the two entities can partner to meet the additional demand for affordable housing.

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

The Springfield Housing Authority holds monthly meetings at each of its hi-rise facilities providing updates and engaging residents. The SHA publishes a quarterly newsletter that is mailed to all participating families and HCV landlords providing updates on agency operations, providing contact information for SHA staff. SHA staff and residents have periodic open meetings to discuss various issues. The Springfield Housing Authority Board meets monthly to address housing issues. The SHA employs a ROSS Coordinator who engage tenants, plan social activities and who serves as a liaison for residents. Asset Managers and/or Management Associates are assigned to each hi-rise facility and family development to address issues faced by residents.

The SHA is designated as a HUD Housing Counseling Agency. The SHA employs a Homeownership Coordinator who assists and provides families with information on credit repair, home buying, renting, defaults, foreclosures, reverse mortgage, and credit issues. Additionally, the SHA employs four (4) Family Self Sufficiency Coordinators responsible for assisting family's transition from government dependence

and assistance to self-sufficiency through one-on-one case management, educational workshops, etc.

The FSS program serves approximately 250 households. The SHA encourages the transition from assisted housing to homeownership each year, by designating 20 HCV vouchers targeted for homeownership.

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

Not applicable. The PHA is not troubled.

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

### **Introduction**

The concept underlying HUD's continuum of care framework is to provide services to homeless persons and those at-risk of homelessness at each step in the process to achieving a permanent, stable housing situation. The elements of this framework include:

- Prevention efforts are those meant to eliminate entry into the shelter system and to help a person or family maintain their current housing situation or to move directly into another permanent housing situation.
- Outreach, intake, and assessment efforts are the first steps to assisting a homeless person or family.
- Emergency shelter provides temporary housing in a safe environment until the person or family can identify a permanent housing situation.
- Transitional housing helps persons who need supportive services or a longer period of time to ready themselves for achieving a permanent housing situation.
- Safe, stable, and affordable permanent housing is the goal for all homeless clients. Permanent housing can take many forms, including traditional market rate housing, rental housing with short- or long-term subsidies, and permanent supportive housing for persons who benefit from on-going supportive services.

Most of the funds available for addressing homeless needs flow from grants received by the Heartland Continuum of Care (CoC), which is lead organization for addressing homelessness in the area. While some cities receive an allocation of Emergency Solutions Grants (ESG) directly from HUD, the City does not qualify for its own allocation. Instead, ESG funding is provided to local agencies through the State of Illinois Department of Human Services. The City does recognize homelessness as a high priority need, especially the Street Homeless (unsheltered) and will coordinate with the Heartland CoC on the delivery of services and development of projects that serve homeless and those at-risk of homelessness.

### **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 will provide support to the Continuum in its efforts to conduct outreach and assessment of the homeless in the area, including support for the HMIS system. Meeting the needs of the chronically homeless is a high priority for the City and the CoC and outreach and assessment is a critical component to serving this population as some clients are reluctant to receiving service.

Assessment includes evaluating the client's housing needs and well as the needs for supportive services. The client is also evaluated for eligibility of mainstream benefits through programs like SSI/SSDI

Outreach Access Recovery (SOAR). Once within the network, the client is provided with linkage and referrals to other community resources. The City works closely with Helping Hands, Fifth Street Renaissance /SARA Center, and Salvation Army on many projects including the SSI/SSDI Outreach Access Recovery (SOAR) Program.

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

The City will continue to work with community stakeholders to open a facility that offers comprehensive services including mental health, health care and emergency shelter services. This facility has been identified as a top goal by City officials and community stakeholders. The City will also work with the CoC to assist and support the other emergency and transitional shelters currently operating, including the support to Salvation Army and Helping Hands low barrier shelter transition initiatives, Contact Ministries, Fifth Street Renaissance, Helping Hands, Sojourn Shelter, Washington Street Mission, and the Youth Service Bureau.

**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**

A lack of permanent supportive housing with wrap around services and supportive rapid re-housing were cited as priority needs in the consultation process with members of the CoC. The shortage of permanent supportive housing creates a bottleneck within the shelter system. If people are unable to transition from the shelter to permanent housing, then people who are currently homeless or in other situations unsuitable for habitation are not able to access the shelter system. The CoC will continue to advocate and support the development of more permanent supportive housing, especially for homeless families with children and chronically homeless populations. The development of additional affordable rental housing (with supportive services) is also needed. The City expects to use available federal funds to subsidize the development of rental housing to meet this need.

The Springfield Housing Authority receives funding through the HUD-Veterans Affairs Supportive Housing (HUD-VASH) program. This program combines rental assistance with case management and clinical services with the goal of providing stable housing for homeless veterans. Currently there is funding to support 55 veterans.

Other strategies to shorten the time of homelessness includes supportive rapid re-housing. Re-housing provides financial support and case management to homeless families to obtain permanent housing and independent living. This type of assistance is often most effective for clients who only need limited assistance to achieve stable housing and family types who have difficulty finding shelters that can serve them. The City is limited in how it can use the federal funds available through this Consolidated Plan to

support rehousing strategies unless there are exceptions due to the coronavirus pandemic.

**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.**

Homeless prevention includes the provision of rental assistance, utility assistance and supportive services directly related to help those in danger of eviction or foreclosure or other loss of shelter. The level of need for homeless prevention may be greatly magnified due to the economic shutdowns related to the pandemic. The City has used \$433,365.41 of CARES Act funds to address short-term needs of 1,017 families and households to remain in their home.

The Continuum has discharge policies in place to ensure systems of care where persons have resided for longer than 90 days, such as correctional facilities and foster care, are not discharged directly into homelessness. Existing policies cover partnerships with foster care, health and mental health care facilities, and correctional facilities.

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

### Introduction:

Regulatory barriers to affordable housing are public processes and requirements that significantly impede the development of affordable housing without commensurate health or safety benefits. These barriers can increase development costs by as much as 35 percent. A number of causes, including infrastructure costs, local building practices, bureaucratic inertia, and property taxes contributed to this network of barriers.

The City feels that it has few, if any, local regulatory barriers that impede the development of affordable housing. The Springfield Zoning Ordinance allows for a broad range of lot area and density formulas that provide discretion to a property owner when constructing single family, duplex, or multifamily residential units. It also allows existing non-conforming uses and non-complying structures to continue to be used and occupied, even though they might be considered substandard by today's requirements.

Building codes can adversely affect cost containment and the provision of affordable housing. The City of Springfield has adopted the International Building Code, Residential Code, Existing Building Code, Property Maintenance Code, and NFPA 101 Life Safety Code. The City feels this regulation, which was designed to accommodate greater affordability in housing, is both reasonable and does not compromise building safety as a consequence of housing affordability.

There are local policies that do cause issues with housing specific populations, including:

- Springfield Housing Authority's policies regarding criminal background checks serves as a regulatory barrier to those trying to re-integrate into the City after leaving the criminal justice system.
- Many landlords will not accept people with a sexual predator background.
- Many homeless shelters admit individuals only. Of those that accept families, some will not accept male children over a specific age. This can result in a family separating to find shelter or living space or remaining homeless to keep the family together.

### **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**

The City will work with its developers to ensure that their plans and projects move through the zoning, approval, and inspection processes with minimal delay. The City will also use available funding from this plan and other sources to subsidize and support the development of new housing. This includes direct

financial support for affordable housing projects, technical assistance, and operating support for affordable housing developers actively pursuing projects in the City, and clearance of blighted structures to incentivize redevelopment. The City will address any regulatory barriers to affordable housing through City Council action as needed.

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

### **Introduction:**

Springfield has developed the following actions which address obstacles to meeting underserved needs, foster affordable housing, reduce lead-based hazards, reduce the number of poverty families, develop institutional structures, and enhance coordination between public and private housing and social service agencies.

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

The City has attempted to create a new homeless facility in order to provide a one-stop shop for homeless persons who need a comprehensive array of services, including mental health services. The proposed site proved controversial to the adjacent neighborhood and did not go forward. The City partnered with the Continuum of Care and the Salvation Army to provide a year-round low-barrier overflow shelter. Additionally, the City expanded its outreach team to fund outreach and mental health specialists in partnership with Memorial Behavioral Health. In conjunction with the Continuum of Care, the City is creating a strategic plan to reach functional zero to address homelessness.

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

As described above in the Affordable Housing section, the City is pursuing a number of affordable housing initiatives, including:

Minor; Emergency Repair, and Restoration 250,000 25 units

HOME Deferred Loan 200,000 4 units

SCIL Ramps Carry over 6 units

CDBG Downpayment Assistance 75,0000 3 units

CHDO Development 82,676 2 units

HOME New Development 787,517 4 units

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

The federal government banned lead-based paint from housing in 1978. Many homes built before 1978 have lead-based paint. Lead is especially dangerous for pregnant women and households with children under the age of six. It is one of the most widespread environmental hazards facing children today. The City will ensure all of its federally funded housing programs are in full compliance with the lead-based paint hazard regulations (24 CFR Part 35). This includes assisting households with the appropriate lead-based paint inspection, testing, and abatement of lead-based paint hazards. The City will provide education through the distribution of lead-based paint information and literature and will seek greater coordination with state agencies to leverage additional resources. The City received supplemental funding to address lead paint and will integrate the mitigation of lead paint into its housing

rehabilitation programs.

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

The City believes the creation and retention of jobs is one of the most effective ways to alleviate poverty and promote self-sufficiency. Given this, special economic development assistance is available to local businesses that agree to employ and train low-income persons. The City also pursues job creation initiatives with Tax Increment Financing (TIF), Enterprise Zone incentives, while maximizing leveraged public and private funds and the Mid-Illinois Medical District. A large part of the efforts to reduce poverty is undertaken by the City's partners who receive CDBG, such as the Heartland Continuum of Care (continuum of local service providers) (CoC) and GROWTH International. CDBG funds are used for public service grants to nonprofit service providers that promote independent living, supportive housing, educational programs, and job training opportunities. Many of these programs are geared toward the homeless and low-income populations and the barriers to self-sufficiency. These partner agencies have a measurable and major impact on alleviation of the effects of poverty by coordinating and providing essential social service programs that help create an independent, safe, stable, healthy lifestyle for homeless or at-risk individuals and families. When feasible, the City will provide job training, employment, and contract opportunities for public housing residents and other low- and moderate-income residents in connection with construction projects. This provision helps foster local economic development, neighborhood economic improvement, and individual self-sufficiency. In this way, the City will comply with Section 3 of the Housing and Urban Development Act of 1968.

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

The Office of Planning Economic Development, OPED, is the lead agency for the development and administration of the Consolidated Plan and projects. OPED and partners, including non-profit organizations, contractors, and other agencies undertake the projects funded through the Consolidated Plan. The City is fortunate to have qualified staff at the subrecipient level and quality non-profits to assist in the implementation of the Plan. Community Relations (CR) has as part of its mission the fostering of effective, considerate interactions among the City's growing, diverse populations. CR makes deliberate, concerted efforts through education and outreach to inform citizens and organizations, particularly those representing underserved groups who are part of racial minorities or disabled persons. CR has a trained, professional staff that specializes in outreach in the community. They are active on many boards and solicit input from groups that represent racial, ethnic minorities, and disabled persons. Two of the more prominent agencies that the City is very active in engaging racial, 4ethnic, and disabled groups are the Springfield Urban League and the Springfield Center for Independent Living (SCIL). SCIL has been involved with the City for over 20 years advising on ADA and related issues. SCIL's Access Coordinator/Specialist directly involves its membership and its clients in program design, especially with its ADA Home Modification and Ramp Program. In addition, The Springfield Urban League connects its members and its clients to City directives and advises the City in

program planning and design.

A common gap among HOME grantees in institutional structure is the lack of certified Community Housing Development Organizations (CHDOs). The City has identified and partnered with a number of CHDOs in recent years, including Growth International, and Nehemiah Expansion, Inc. One concern noted during the planning process was a lack of dedicated staff to oversee and coordinate the CoC. The City has stepped forward to partially fund a new homeless coordinator position to address this need. As noted earlier, a continued gap exists for a facility that is able to provide access to health and mental health services for the homeless population. The City has budgeted for a Community Care Coordinator as part of a crisis intervention initiative to serve the homeless and mentally ill. The City is working with the Continuum of Care and other agency partners to resolve the gaps of services for the homeless. The City, as a stakeholder, with the Continuum of Care is working together to address gaps in the homeless continuum including transitional units and additional permanent supportive housing.

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

The City will continue to participate in and support the Continuum of Care and its members. The City plans to continue to support the Continuum of Care, including the funding for supportive outreach efforts. The City has initiated a Housing Policy Council to help engage all stakeholders in issues such as affordable housing and redevelopment efforts.

In addition, the City participates in a number of ongoing local and regional coordination efforts throughout the program year. The City held strategic planning meetings in each ward and maintains several commissions to provide on-going discussion and coordination among citizens and stakeholders, including the Community Relations Commission, the Disabilities Commission, and Housing Policy Council, the Economic and Community Development Commission, and Veterans Advisory Council.

### **Discussion:**

Not applicable.

## Program Specific Requirements

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

#### Introduction:

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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	0
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>0</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.	72.00%

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

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

The City does not intend to invest HOME funds in a project beyond those identified in 92.205. Proposed use of funds includes loans, forgivable loans, and grants for the purpose of housing

development.

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

The City's utilizes a 2nd mortgage and Recapture agreement on each home assisted with HOME funds. A full version of the guidelines is attached to this plan.

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 City's utilizes a 2nd mortgage and Recapture agreement on each home assisted with HOME funds. A full version of the guidelines is attached to this 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:

The City does not intend to use HOME funds to refinance existing debt during the program year.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The City does not plan to use HOME funds for Tenant Based Rental Assistance (TBRA).

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

The City does not plan to use HOME funds for Tenant Based Rental Assistance (TBRA).

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

The City does not plan to establish any preference or limitation for rental housing projects.