

# Executive Summary

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

### 1. Introduction

For Fiscal Year (FY) 2014-2015, the Urban County is a CDBG entitlement jurisdiction and anticipates receiving \$856,820 for the unincorporated areas and the cities of Del Rey Oaks and Gonzales. Currently, the Urban County is not eligible to receive funding under the HOME Investment Partnership Act (HOME), Emergency Solutions Grant (ESG), or Housing Opportunities for Persons with AIDS (HOPWA) - also programs covered under the Consolidated Plan regulations.

As of the writing of this Action Plan, HUD has not yet released the actual allocations for FY 2014-2015. Per instructions from HUD, the Urban County is planning for the Action Plan based on FY 2013-2014 allocation. Once the actual CDBG allocations are announced, the Urban County will adjust the project funding on a pro rata basis.

### 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.

The Urban County has extensive housing and community development needs. CDBG funds alone are not adequate to address the myriad needs identified during the public outreach process and summarized in the Needs Assessment of this Consolidated Plan. Recognizing the national objectives of the CDBG program and specific program regulations, the Urban County intends to use CDBG funds to coordinate programs, services, and projects to create a decent and suitable living environment to benefit low and moderate income households and those with special needs. Use of CDBG funds will focus on some of the most critical needs in the Urban County, including the following:

- Improvements to infrastructure and public facilities in order to foster a suitable living environment for low and moderate income households and those with special needs;
- Provision of services and programs to benefit low and moderate income households and those with special needs, such as youth (and at-risk youth), seniors, and the disabled;
- Provision of services for the homeless and those at risk of becoming homeless; and
- Provision of affordable housing to low and moderate income households and those with special needs.

### 3. Evaluation of past performance

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

The Urban County has not yet completed its first year of entitlement. Because of this, the Urban County relied more on the identified needs of the community as identified in the Consolidated Plan and a Public Hearing held on December 16, 2013 than it did on past performance. Additionally, needs are so great in comparison to funding that all needs could never be addressed.

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

Summary from citizen participation section of plan.

In 2013, the following public outreach took place: A public notice in regard to the Public Hearing was issued on December 4<sup>th</sup> in the Salinas Californian (in English) and on December 7<sup>th</sup> in the El Sol (in Spanish) newspapers. A direct email was also sent on December 5<sup>th</sup> to a list of 252 agencies and interested parties. Additionally, the Public Notices were posted on the websites of all three Urban County jurisdictions.

As part of the Notice of Funding Availability workshop, the Public Hearing was held on December 16, 2013, from 10:25 a.m. to 10:40 a.m. in the Board of Supervisors Chamber at the County Government Center located at 168 W. Alisal Street, Salinas, CA.

An Ad Hoc Committee met on March 13, 2014 to review requests for funding and make recommendations to the Board of Supervisors in regard to funding. The meeting was attended by eighteen people. Public comment was heard from twelve individuals representing six agencies and seven projects/programs. The funding recommendations were incorporated into the draft Annual Action Plan.

The draft Action Plan was presented to the Board of Supervisors and proposed allocations were approved on April 1, 2014. A Notice of Comment Period and Public Hearing was published on April 3<sup>rd</sup> and 5<sup>th</sup>, 2014 in the Salinas Californian and the El Sol newspapers. The following comments were received at the meeting:\_\_\_\_\_.

A second public hearing was held on May 6, 2014. Comments received were as follows:

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\_\_\_\_\_. After deliberations, the Board approved the final Annual Action Plan including funding allocations for projects and programs/services.

#### 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.

Public comments received at the Public Hearing on December 16, 2014 as part of the NOFA Workshop were as follows:

1. Dave Garti, Grid Alternatives: Low-income families need help with paying their utility bills as a higher percent of their income goes to utility costs in comparison to higher income families;
2. Kate Smith, MidPen Housing: Identified a housing project in Castroville that needs rehab/mitigation work for health and safety reasons in order to preserve affordable housing;
3. Ed Muniz, Monterey County Public Works: funding for addressing health/safety issues with Chualar waste water system;
4. Juan Uranga, Center for Community Advocacy: Farm-worker issues such as housing for unaccompanied temporary farm workers from out of area/state; housing for permanent farm workers (not enough available which results in overcrowding and unhealthy living environments);

5. Florence Kabwasa-Green, Monterey County Public Works: Public buildings in south county need site remediation to keep them open, safe and running;
6. Oga Carranza, Monterey County Public Works: dangerous walking conditions in Las Lomas area need street lighting and drain improvements due to flooding;
7. Cecelia Flores, Rancho Cielo: Stimulate employment by developing vocational training for jobs of the future; and
8. Andrea Nield, CSUMB/Small Business Center: business expansion in the County via funding for micro-enterprises.

No written public comments were received.

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

All comments were accepted.

**7. Summary**

The Urban County has undertaken diligent and good faith efforts to outreach to all segments of the community that may benefit from the CDBG program.

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

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

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

Agency Role	Name	Department/Agency
Administration	Jane Royer Barr	Monterey County
Administration	Darby Marshall	Monterey County

Table 1 - Responsible Agencies

### Narrative (optional)

The Urban County is comprised of the County unincorporated areas and the cities of Del Rey Oaks and Gonzales. The County of Monterey serves as the lead agency for the Urban County. The Urban County CDBG program is administered by the Monterey County Economic Development Department.

### Consolidated Plan Public Contact Information

For matters concerning the Urban County's CDBG program, please contact: Jane Royer Barr, Program Manager, Monterey County Economic Development, 168 W. Alisal Street, 3rd Floor, Salinas, CA 93901, (831) 755-5389.

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

### 1. Introduction

As part of this Action Plan development, the Urban County undertook an outreach program to consult and coordinate nonprofit agencies, affordable housing providers, and government agencies.

#### **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))**

To outreach to various agencies, organizations and individuals, the Urban County compiled an outreach list consisting of 242 names, including:

- Nonprofit service providers that cater to the needs of low and moderate income households and persons with special needs, including persons with disabilities;
- Affordable housing providers;
- Housing advocates;
- Housing professionals;
- Public agencies (such as school districts, health services, public works);
- Economic development and employment organizations; and
- Community groups.

The complete outreach list is included in Appendix B. These agencies received direct mailing of notices of the Urban County's Action Plan process and public meetings.

#### **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 outreach list includes homeless service agencies in the Salinas/Monterey County and San Benito County Continuum of Care Strategy.

#### **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 Urban County's HUD allocation for entitlement grants currently does not include ESG funds.

**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**

1	<b>Agency/Group/Organization</b>	City of Del Rey
	<b>Agency/Group/Organization Type</b>	General Government
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Facilities - Community Facilities and Accessibility Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Definition of need in the community for public facilities and accessibility
2	<b>Agency/Group/Organization</b>	City of Gonzales
	<b>Agency/Group/Organization Type</b>	General Government
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Facilities - Community Facilities and Accessibility Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Definition of need in the community for public facilities and accessibility
3	<b>Agency/Group/Organization</b>	Legal Services for SSeniors
	<b>Agency/Group/Organization Type</b>	Services - Elderly Persons
	<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>	Improved fair housing and outreach for best provision of services

4	<b>Agency/Group/Organization</b>	GRID Alternatives
	<b>Agency/Group/Organization Type</b>	Services-Low/Mod Households
	<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>	Improved housing costs for low/mod homeowners
5	<b>Agency/Group/Organization</b>	County of Monterey Public Works Department
	<b>Agency/Group/Organization Type</b>	General Government
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Facilities - Community Facilities and Accessibility Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Definition of need in the community for public facilities and accessibility
6	<b>Agency/Group/Organization</b>	MidPen Housing Corporation
	<b>Agency/Group/Organization Type</b>	Affordable Housing Provider
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Definition of need in the community and outreach for best provision of services
7	<b>Agency/Group/Organization</b>	University Corporation at Monterey Bay
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Economic 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>	SBDC Self Employment through Micro Enterprise Training

8	<b>Agency/Group/Organization</b>	Rancho Cielo
	<b>Agency/Group/Organization Type</b>	Non-Profit: At Risk Youth
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Special Needs Services - At Risk Youth/ Transitional Housing; Public Services; Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved services for at risk youth
9	<b>Agency/Group/Organization</b>	Center For Community Action
	<b>Agency/Group/Organization Type</b>	Non-Profit: farmworkers
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Services ; 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>	Improved housing for farmworkers
10	<b>Agency/Group/Organization</b>	Interim, Inc.
	<b>Agency/Group/Organization Type</b>	Non-profit Affordable Housing and Services Provider for psychiatrically disabled
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless and Non-Homeless Special Needs; Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved resources for psychiatrically disabled

11	<b>Agency/Group/Organization</b>	Alliance on Aging
	<b>Agency/Group/Organization Type</b>	Non-Profit - Seniors
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved services for seniors
12	<b>Agency/Group/Organization</b>	Project Sentinel
	<b>Agency/Group/Organization Type</b>	Services-
	<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>	Improved fair housing and outreach for best provision of services
13	<b>Agency/Group/Organization</b>	Family Services Agency
	<b>Agency/Group/Organization Type</b>	Non-Profit Services provider
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved services for prevention of suicide

14	<b>Agency/Group/Organization</b>	Shelter Outreach Plus
	<b>Agency/Group/Organization Type</b>	Non-profit homeless housing and services provider
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment - 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>	Improved housing and services for homeless
15	<b>Agency/Group/Organization</b>	YMCA
	<b>Agency/Group/Organization Type</b>	Non-profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved recreational services for youth and families
16	<b>Agency/Group/Organization</b>	Girls, Inc.
	<b>Agency/Group/Organization Type</b>	Non-profit
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development Needs: Public Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Improved services for youth and at risk youth

Table 2 - Agencies, groups, organizations who participated

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

The Urban County's outreach program was comprehensive.

**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	Coalition of Homeless Services Providers	Through the outreach process, the Urban County has identified homelessness and homelessness prevention services as a priority for the CDBG program. These services will complement the Continuum of Care Strategy.

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

**Narrative (optional)**

The Urban County program covers the County unincorporated areas and the cities of Del Rey Oaks and Gonzales. County and city departments that may have an interest in the CDBG program were invited to participate in the Action Plan process through the Notice of Funding Availability (NOFA) process.

## 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 Urban County conducted a workshop and noticed Public Hearing on December 16, 2014 to receive input on needs. The comments received helped to determine the priority for allocating the FY 2014 Action Plan. The Urban County also held a publicly noticed meeting on March 6, 2014 to discuss, receive input, and make recommendations in regard to requests for funding.

#### Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Representatives from over 18 agencies and several individuals attended the various public meetings/hearings conducted for Annual Action Plan.</p>	<p>Key issues identified include: 1) Need for improvements to infrastructure and public facilities; 2) youth services, particularly for at-risk youth; 3) affordable housing; 4) senior services; 5) housing rehabilitation assistance; and 6) fair housing issues particularly impacting seniors and non-English speakers.</p>	<p>All comments were accepted.</p>	

Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	Notices were published in two newspapers: The Californian (English) and El Sol (Spanish).	Not Applicable	Not Applicable	
Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	The NOFA was posted on the County and City's websites.	Not Applicable	Not Applicable	
Other	Non-targeted/broad community	Over 240 agencies, organizations, and individuals received direct mailing of the notice of public meeting and NOFA.	Not Applicable	Not Applicable	

**Table 4 - Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The Urban County is a CDBG entitlement jurisdiction and anticipates receiving \$856,820 for FY 2014-2015 for the unincorporated areas and the cities of Del Rey Oaks and Gonzales.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder 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	\$856,820	0	0	\$856,820	\$2,036,360	The Urban County anticipates approximately \$856,820 to be available for FY 2014-2015 based on the current Urban County area. However, over a five-year period, the Urban County conservatively assumes only \$3,750,000 to be available, accounting for potential budget cuts in the future.

Table 4 - 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 Urban County will utilize a variety of funding sources to leverage CDBG funds. These include:

- **General:** The County has some sources of funding for affordable housing and public facilities and infrastructure improvements. These include Inclusionary Housing In-Lieu fees, Program Income, competitive State HOME funds, and general County funds.
- **Section 8 and Public Housing:** The Housing Authority of the County of Monterey (HACM) operates Public Housing and Rental Assistance programs for County residents. HACM programs are a critical resource for extremely low and low income households.
- **Redevelopment Tax Increment Financing:** Redevelopment agencies throughout the State were dissolved as of February 2012. Local jurisdictions no longer have the ability to generate funding for affordable housing and community development through tax increment financing. Existing balance of tax increment funds were transferred to the Monterey County Auditor for distribution to local taxing entities, except for funds that were legally obligated for projects prior to December 31, 2010. Both the County of Monterey and City of Gonzales have established successor agencies to oversee the spending of remaining tax increment funds. In regard to housing, the County is now acting as the Housing Successor Agency and will oversee any Program Income from former RDA housing loans.

The Urban County does not receive HOME funds from HUD directly.

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

The Urban County does not anticipate utilizing publicly owned land to address the housing and community development needs identified in the Plan.

**Discussion**

See discussions above.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Public Facilities	2013	2017	Non-Homeless Special Needs Non-Housing Community Development		Public Facilities	CDBG: \$478,772	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4,426 Persons Assisted; Brownfield acres remediated: 1 acre
Infrastructure Improvements	2013	2017	Non-Housing Community Development		Infrastructure Improvements	CDBG: \$1,684	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 2 Households Assisted
Public Services	2013	2017	Non-Homeless Special Needs		Public Services	CDBG: \$55,000	Public service activities other than Low/Moderate Income Housing Benefit: 1,570 Persons Assisted
Homeless and Homeless Prevention Services	2013	2017	Homeless		Homeless Services and Homeless Prevention	CDBG: \$30,000	Homelessness Prevention: 110 Persons Assisted
Fair Housing	2013	2017	Non-Homeless Special Needs Fair Housing		Public Services	CDBG: \$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 340 Persons Assisted
Affordable Housing	2013	2017	Affordable Housing		Affordable Housing	CDBG: \$100,000	Rental units rehabilitated: 11 Household Housing Units

**Table 6 - Goals Summary**

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

The Urban County's HUD allocation for entitlement grants does not include funding from the HOME program. For FY 2014-2015, CDBG funds in the amount of \$100,000 will be directly used to support one affordable housing project. Of the eleven units in the project, six will be occupied by moderate income households (80 percent AMI) and five by low income households (50 percent AMI). In addition, CDBG funds will be used to pay for the balance of an assessment for the Oakridge and Via Del Sol Water System for two low income households.

## **AP-35 Projects - 91.220(d)**

### **Introduction**

FY 2014-2015 is the Urban County's second year of implementing the Community Development Block Grant (CDBG) program. This program is administered by the U.S. Department of Housing and Urban Development and provides funding for a variety of projects and programs, with eligibility based on meeting the following national objectives:

- Benefitting low and moderate income persons;
- Eliminating slum and blight; or
- Meeting a particularly urgent community need.

The Urban County plans to expend the CDBG funds to address housing and community development needs identified in the five-year Consolidated Plan according to priorities, goals, and objectives outlined therein.

### **FY 2014-15 Funding Allocation**

As of the writing of this Action Plan, HUD has not yet released the actual CDBG allocations for FY 2014-2015. The Urban County is planning with an estimated amount of \$856,820 based upon the previous year's allocation. Once the actual allocation is announced, the Urban County plans to adjust the CDBG budget as follows:

- If the CDBG allocation is less than \$856,820, overall funding levels for all jurisdictions will be adjusted downward on a pro rata basis. In regard to County projects, any reduction in funding will be applied to the Porter Mansion project.
- If the CDBG allocation is more than \$856,820, funding levels for projects will be adjusted as follows:
  - Projects (non-public service) in Del Rey Oaks and Gonzales will be adjusted based upon the percentage increase in funding.
  - For County projects, if the percentage increase in funding is less than \$10,000, then the funds will be allocated to the Porter Mansion project. If the percentage increase in funding is greater than \$10,000, then up to \$30,000 of the funds (the amount of their original request of \$30,000) will be allocated to the GRID Alternatives backup project (see description below). If the increase is more than \$30,000, then the additional funds above \$30,000 will be allocated to the Porter Mansion.
- If the CDBG allocation is less than \$856,820, funding levels for services/programs will be adjusted downward on a pro rata basis.
- If the CDBG allocation is more than \$856,820, any excess will be allocated to Legal Services for Seniors for fair housing services.

### **Backup Projects**

Should funding become available during FY 2014-2015, the Urban County proposes to activate the following backup project:

- GRID Alternatives Project: This project consists of the installation of solar electric

systems on up to ten houses owned by low/mod families. Locations of the houses would most likely be in south county unincorporated areas but may also be located in any of the participating jurisdictions.

Additionally, excess funding could be allocated to any of the following projects already approved:

- Porter Mansion Improvement Project
- San Lucas Library
- Geil Street Apartments
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#	Project Name
1	County - Porter Mansion ADA Improvements
2	County - San Lucas Branch Library Soil Remediation
3	County - Oakridge & Via Del Sol Water System
4	County - Geil Street Apartments Rehabilitation
5	Del Rey Oaks - City Hall ADA Improvements
6	Gonzales - Curb Ramp Accessibility Improvements
7	Urban County - Mobile Outreach Services Team (MOST) Homeless Services
8	Urban County - Boys and Girls Clubs of Monterey After School Program
9	Urban County - Food Bank for Monterey County Senior Center Food Distribution
10	Urban County - Central Coast YMCA Pajaro Park Program
11	Urban County - Girls Inc. After School Program
12	Urban County - Rancho Cielo Transitional Housing At Risk Case Management
13	Urban County - Fair Housing Services (Project Sentinel)
14	Urban County - Fair Housing Services (Legal Services for Seniors)
15	Urban County - CDBG Planning and Administration
#	Project Name

Table 5 - Project Name List

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	<b>County - Porter Mansion ADA Improvements</b>	Public Facilities	North County Unincorporated	Infrastructure Improvements	CDBG: \$160,432
	Description	This community facility requires rehabilitation to make ADA improvements in order to be more accessible. This facility is located in the unincorporated community of Pajaro and serves only this community. Of the 3,070 residents in this area, 60% percent have low or moderate incomes.			
	Planned Activities	Proposed CDBG-funded rehabilitation/ADA improvements include design and construction of ADA improvements including interior and exterior upgrades to side and rear entries, door hardware, parking lot configuration and first floor restrooms in order to make the facility ADA accessible.			
2	<b>County - San Lucas Branch Library Soil Remediation</b>	Public Facilities	South County Unincorporated	Public Facilities	CDBG: \$150,938
	Description	Brownfield remediation of former County library site in San Lucas			
	Planned Activities	CDBG funds will be used to remediate contaminated soils.			
3	<b>County - Oakridge &amp; Via Del Sol Water System</b>	Infrastructure Improvements	North County Unincorporated	Infrastructure Improvements	CDBG: \$1,684
	Description	This project is located within the unincorporated County, specifically on Oakridge Drive and Dunbarton Road in Aromas, and La Encina and Via Del Sol in Prunedale. The project provides municipal water, fire hydrant, and water delivery infrastructure.			
	Planned Activities	A property tax assessment district has been formed to pay for the construction of the water system in these areas. CDBG funds in the amount of \$120,054 were allocated in 2013-2014 to pay for the assessment for two low income households. The remaining balance of the assessment of \$1,684 will be paid out of the 2014-2015 allocation.			
4	<b>County - Geil Street Apartments Rehabilitation</b>	Affordable Housing	North County Unincorporated	Affordable Housing	CDBG: \$100,000
	Description	This project consists of rehabilitation of unit interiors, including improvements to the kitchens and bathrooms, in all eleven units on the property.			
	Planned Activities	The scope of work includes complete renovation of kitchens, including reconfiguration to properly vent stoves and eliminate cabinetry that is currently above improperly vented stoves; bathroom improvements including new vanities, flooring, tub tile surrounds, sinks and GFI outlets, as needed; and miscellaneous improvements and upgrades including new carpet, paint and window blinds where needed.			

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
5	Del Rey Oaks - City Hall ADA Improvements	Public Facilities	Del Rey Oaks	Public Facilities	CDBG: \$26,516
	Description	This project will provide ADA improvements to the Del Rey Oaks City Hall. The City Hall houses all city functions, including holding all public meetings and community workshops.			
	Planned Activities	Improvements will be made to make the bathrooms and city hall chambers accessible to the public.			
6	Gonzales - Curb Ramp Accessibility Improvements	Public Facilities	Gonzales	Public Facilities	CDBG: \$140,886
	Description	This project is the installation of curb ramps at intersections throughout Gonzales.			
	Planned Activities	CDBG funds will be used to pay for the costs of curb ramps construction at various city intersections.			
7	<b>Urban County - Mobile Outreach Services Team (MOST) Homeless Services</b>	Homeless and Homeless Prevention Services	All jurisdictions	Homeless and Homeless Prevention Services	CDBG: \$15,000
	Description	This project provides medical and mental health assessments by a licensed clinical social worker.			
	Planned Activities	M.O.S.T. operates out of a van and is deployed to different locations where homeless are known to gather throughout Monterey County. Mental health assessments allow for deepened services to clients and provide better linkages to providers that will be able to meet their unique needs.			
8	<b>Urban County - Boys and Girls Clubs of Monterey After School Program</b>	Public Services	Gonzales	Public Services	CDBG: \$15,000
	Description	This program will provide youth development programming for youth after school, specifically using programming that targets gang and violence prevention and incorporates mentorship methods.			
	Planned Activities	The program features five major components: Homework help and tutoring; High-yield learning and leisure activities; Parent and adult involvement; Collaboration with schools; and Incentives.			
9	<b>Urban County - Food Bank for Monterey County Senior Center Food Distribution</b>	Public Services	North County Unincorporated	Public Services	CDBG: \$15,000

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
	Description	The Food Bank supplies emergency and supplemental food to the low- and no- income residents of Monterey County.			
	Planned Activities	The Food Bank will distribute donated, government, and purchased food to two senior centers in Prunedale and Castroville.			
10	<b>Urban County - Central Coast YMCA Pajaro Park Program</b>	Public Services	North County Unincorporated	Public Services	CDBG: \$15,000
	Description	The YMCA will offer structured and scheduled park program activities to maximize the park for the community's use, enjoyment and diverse interests while minimizing conflicts between users.			
	Planned Activities	The YMCA will offer year round youth sports leagues and camps, summer day camp, fitness classes and organized family events for children and families living in and around Pajaro.			
11	<b>Urban County - Girls Inc. After School Program</b>	Public Services	North County Unincorporated	Public Services	CDBG: \$10,000
	Description	Girls Inc. of the Central Coast proposes to provide after-school programming for girls, ages 9 -18, at 4 school sites in Castroville.			
	Planned Activities	The programs will focus on pregnancy prevention, leadership development, pursuing post-secondary education, self-empowerment, avoiding drugs and alcohol, and resisting peer pressure including gang prevention.			
12	<b>Urban County - Rancho Cielo Transitional Housing At Risk Case Management</b>	Public Services	North County Unincorporated	Public Services	CDBG: \$15,000
	Description	The program offers at-risk young people the opportunity to reevaluate their life options through education, job training, and individualized counseling.			
	Planned Activities	The program will pay for a portion of salary costs associated with the Case Manager and Program Director positions for the transitional housing program.			
13	<b>Urban County - Fair Housing Services (Project Sentinel)</b>	Fair Housing	All jurisdictions	Public Services	CDBG: \$10,000
	Description	Project Sentinel will provide fair housing services in the Urban County area.			
	Planned Activities	Project Sentinel will undertake activities to affirmatively further fair			

No.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
		housing including: Community outreach and education; Investigation of housing discrimination complaints; Audits of potential discrimination; and Consultations & Referrals.			
14	Urban County - Fair Housing Services (Legal Services for Seniors)	Fair Housing	All jurisdictions	Public Services	CDBG: \$10,000
	Description	Legal Services for Seniors (LSS) will provide fair housing services for seniors in the Urban County area.			
	Planned Activities	Legal Services for Seniors (LSS) will provide direct free legal representation to low/mod seniors in regard to a wide variety of fair housing, tenant and home ownership housing problems as well as workshops and presentations to the community to educate them on their rights.			
15	Urban County - CDBG Planning and Administration	Public Facilities Infrastructure Improvements Public Services Homeless and Homeless Prevention Services Fair Housing	All jurisdictions	Planning and Administration	CDBG: \$171,364
	Description	The project provides for the administration of the CDBG program to comply with HUD regulations and requirements.			
	Planned Activities	CDBG program administration includes, but is not limited to, the following activities: <ul style="list-style-type: none"> <li>• Preparation of planning, reporting, and environmental clearance documents;</li> <li>• Delivery of CDBG-funded programs and projects;</li> <li>• Monitoring of progress, achievements, and expenditure of CDBG funds; and</li> <li>• Maintenance of program and financial records.</li> </ul>			

**Table 8 - Project Information**

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

The following established Priority Needs form the basis for allocating investments geographically within the Urban County during the next five-year period and are a result of various community outreach efforts and consultation meetings conducted during the Citizen Participation process.

- Improvements to infrastructure and public facilities in order to foster a suitable living environment for low and moderate income households and those with special needs;
- Provision of services and program to benefit low and moderate income households and those with special needs, such as youth (and at-risk youth), seniors, and the disabled;
- Provision of services for the homeless and those at risk of becoming homeless; and
- Provision of affordable housing to low and moderate income households and those with special needs.

The Urban County has extensive housing and community development needs. The lack of adequate funding is the most critical obstacle to addressing underserved needs. Only eligible activities that received a High priority level in the FY 2013 - FY 2017 Consolidated Plan, will be funded.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding
County - Porter Mansion ADA Improvements	North County unincorporated	Public Facilities	Public Facilities	CDBG: \$160,432
County - San Lucas Branch Library Soil Remediation	South County unincorporated	Public Facilities	Public Facilities	CDBG: \$150,938
County - Oakridge & Via Del Sol Water System	North County unincorporated	Infrastructure Improvements	Infrastructure Improvements	CDBG: \$1,684
County - Geil Street Apartments Rehabilitation	North County unincorporated	Affordable Housing Rehabilitation	Affordable Housing	CDBG \$100,000
Del Rey Oaks - City Hall ADA Improvements	Del Rey Oaks	Public Facilities	Public Facilities	CDBG: \$26,516
Gonzales - Curb Ramp Accessibility Improvements	Gonzales	Public Facilities	Public Facilities	CDBG: \$140,886
Urban County - Mobile Outreach Services Team (MOST)	Del Rey Oaks, Gonzales, and unincorporated	Homeless and Homeless Prevention Services	Homeless Services and Homeless Prevention	CDBG: \$15,000
Urban County - Boys and Girls Clubs of Monterey After School Program	Gonzales	Public Services	Public Services	CDBG: \$15,000
Urban County - Food Bank for Monterey County Senior Center Food Distribution	North County unincorporated	Public Services	Public Services	CDBG: \$15,000
Urban County - Central Coast YMCA Pajaro Park Program	North County unincorporated	Public Services	Public Services	CDBG: \$15,000

<b>Project Name</b>	<b>Target Area</b>	<b>Goals Supported</b>	<b>Needs Addressed</b>	<b>Funding</b>
Urban County - Girls Inc. After School Program	North County unincorporated	Public Services	Public Services	CDBG: \$10,000
Urban County - Rancho Cielo Transitional Housing At Risk Case Management	North County unincorporated	Public Services	Public Services And Homeless Services and Homeless Prevention	CDBG: \$15,000
Urban County - Fair Housing Services (Project Sentinel)	Del Rey Oaks, Gonzales, and unincorporated	Fair Housing	Public Services	CDBG: \$10,000
Urban County - Fair Housing Services (Legal Services for Seniors)	Del Rey Oaks, Gonzales, and unincorporated	Fair Housing	Public Services	CDBG: \$10,000
Urban County - CDBG Planning and Administration	Del Rey Oaks, Gonzales, and unincorporated	Public Facilities Infrastructure Improvements Public Services Homeless and Homeless Prevention Services Fair Housing	Planning and Administration	CDBG: \$171,364

**Table 9 - Projects Summary**

## 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

The Urban County has not established specific target areas where CDBG funds will be focused. For FY 2014-2015, the cities of Del Rey Oaks and Gonzales will pursue ADA accessibility improvement projects that benefit all persons with disabilities in the respective communities. The County will pursue one public facility project that serves primarily low and moderate income persons in North County and one public facility project that serves primarily low and moderate income persons in South County. In addition, the County will support the rehabilitation of a rental housing project benefitting eleven low and moderate income households. Public services will benefit low and moderate income persons or persons with special needs throughout the Urban County area.

### Geographic Distribution

Target Area	Percentage of Funds

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

The Urban County has not established specific geographic target areas where CDBG funds will be focused. Housing and community development needs in the Urban County far exceed the availability of funding to address those needs. Annually, Urban County staff and the CDBG Ad Hoc Committee will evaluate applications for funding based on a number of factors, including:

- Urgency of needs;
- Availability of other funding sources; and
- Project feasibility and cost effectiveness.

### Discussion

See discussions above.

## Affordable Housing

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

#### Introduction

With a limited CDBG allocation, the Urban County does not anticipate expending a significant portion of its CDBG funds on providing affordable housing. Other funding sources, such as State HOME funds and inclusionary housing in-lieu fees, will be the primary sources of funding to address affordable housing needs in the Urban County.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	11
Special-Needs	0
Total	0

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	11
Acquisition of Existing Units	0
Total	11

**Table 12 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Mid-Pen will acquire and rehabilitate the 11-unit Geil Street Apartments. Rehabilitation work will focus on correcting health and safety issues and thus affording the residents the opportunity to continue to live in affordable housing.

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

### **Introduction**

Two public housing developments are located in the City of Gonzales. No public housing developments are located in the City of Del Rey Oaks or in the unincorporated County areas.

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

The Housing Authority of the County of Monterey (HACM) manages the two public housing developments in Gonzales. The HACM is exploring opportunities to privatize one of the developments.

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

The HACM requires or promotes a range of activities to increase resident involvement in the public housing program. These include:

- Requiring each adult household member to participate in eight hours of community services;
- Encouraging the installation of neighborhood watch programs;
- Conducting tenant meetings to receive input from residents; and
- Conducting specific meetings before the HACM board regarding tenant involvement.

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

The Housing Authority of the County of Monterey is not designated as "troubled."

### **Discussion**

See discussions above.

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

### **Introduction**

Homeless and homeless prevention services are identified as a high priority need in the FY 2013 - FY 2017 Consolidated Plan. The Urban County anticipates expending approximately 35 percent of its public service cap (up to 15 percent of the CDBG annual allocation) to provide homeless and homeless prevention services through the following:

- Mobile outreach services to homeless - Shelter Outreach Plus (11.67%)
- Food distribution to residents in the Castroville and Prunedale areas - Food Bank for Monterey County (11.67%)
- Case management for homeless at risk youth in transitional housing - Rancho Cielo (11.67%)

### **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**

For FY 2014-2015, the Urban County plans to allocate funding for the Mobile Outreach Service Team (MOST). This program will operate out of a van and be dispatched five times a week to areas where homeless persons are known to be gathering. MOST will provide items such as food, blanket, toiletries, and other basic personal items to the homeless. Information and referral, along with basic case management, will be provided to help the homeless access shelters and permanent housing. CDBG funding will support medical assessments and mental health assessments by a licensed clinical social worker.

The Rancho Cielo project will provide case management to six at-risk youth in transitional housing who were homeless due to gang issues.

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

As mentioned above, the Urban County plans on funding the Mobile Outreach Service Team (MOST) to provide homeless outreach activities. These activities will help connect the homeless with available services and assist them in transitioning to shelters, transitional housing, and/or permanent housing. In addition, the Rancho Cielo project will provide case management to 6 at-risk youth in transitional housing who were homeless due to gang issues.

In addition, the Urban County will continue to rely on a vast network of public and nonprofit agencies in the Continuum of Care (CoC) system to provide a range of housing options and services. The CoC system strives to provide and expand housing opportunities for the homeless and formerly homeless, through emergency shelters, transitional housing, supportive housing, and permanent housing. Outreach, assessment, and case management services are also offered through this network to assist the homeless in transitioning to permanent housing.

**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.**

The Food Bank project in North County will deliver food on a weekly basis to seniors in Castroville and Prunedale. This will assist this no and low income population by reducing their food expense which allows them to use more income for housing, medical, and other monthly expenses.

**Discussion**

See discussions above.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

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

### Introduction

Market and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact low and moderate income households due to their limited resources for absorbing the costs. Individually, local jurisdictions have little influence over the market factors (such as the cost of labor and construction materials, cost of land, or availability of financing), or statewide and national policies (such as prevailing wage requirements, environmental protection, and California Coastal Act). Other local factors that could potentially impede affordable housing development include:

- Residential Land Use Policies
- Development Regulations
- Development Review Process

The Urban County strives to mitigate local barriers to affordable housing by offering incentives to encourage affordable housing development.

**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 following tools are available to mitigate the cost of housing development. These include:

- Density Bonus: State density bonus law provides density increases, along with other regulatory concessions and incentives in exchange for affordable housing.
- Second Units: Jurisdictions are required to permit second units through a ministerial process in single-family zones.
- Streamline Processing: All local jurisdictions are required to adhere to the Streamline Processing Act to reduce the time associated with project review and approval.
- CEQA Exemption: Affordable housing and infill housing projects are exempt under the California Environmental Quality Act (CEQA).

### Discussion

See discussions above.

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

### **Introduction**

This section discusses the Urban County's efforts in addressing underserved needs, developing the institutional structure for delivering housing and community development activities, and expanding and preserving affordable housing opportunities.

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

Based on the results of the community outreach process, the Urban County's most underserved groups are the homeless and youth. Generally, the lack of funding is the most critical obstacle to meeting the needs of these groups. The Urban County intends to help bridge the gap by allocating CDBG funds to homeless, homeless prevention, and youth programs.

CDBG funds are limited. Therefore, the Urban County will continue to rely on the existing network of public and nonprofit agencies to deliver a variety of housing and supportive services for the homeless and youth in the community.

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

The Urban County will continue to foster and maintain affordable housing through the following:

- **Density Bonus:** State density bonus law provides density increases, along with other regulatory concessions and incentives in exchange for affordable housing.
- **Second Units:** Jurisdictions are required to permit second units through a ministerial process in single-family zones.
- **Streamline Processing:** All local jurisdictions are required to adhere to the Streamline Processing Act to reduce the time associated with project review and approval.
- **CEQA Exemption:** Affordable housing and infill housing projects are exempt under the California Environmental Quality Act (CEQA).

In addition, the Urban County will continue to pursue funding from the State and Federal levels to support new construction, rehabilitation, and acquisition/rehabilitation of affordable housing.

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

Lead poisoning is addressed by the Monterey County Health Department Childhood Lead Poisoning Prevention Program (CLPPP). CLPPP provides services to the community to:

- Increase awareness of the hazards of lead exposure;
- Reduce lead exposure.; and
- Increase the number of children assessed and appropriately blood tested for lead poisoning.

A public health nurse provides home visitation and case management, and a registered environmental health specialist provides environmental home inspections to families of children found to be severely lead-poisoned. Local code enforcement staff will continue to provide information on lead-based paint hazards and resources for abatement.

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

The Urban County seeks to reduce the number of people living in poverty (extremely low-income households earning less than 30 percent of the AMI) by providing a number of programs, including housing assistance, supportive services, economic development

assistance, and job training opportunities. This anti-poverty strategy utilizes existing County job training and social service programs to increase employment marketability, household income, and housing options. These programs are detailed in the FY 2013-FY 2017 Consolidated Plan.

**Actions planned to develop institutional structure**

Urban County staff will continue to communicate with local HUD staff, consult with neighboring CDBG jurisdictions, and attend HUD trainings to expand their knowledge in the CDBG program.

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

The Urban County will continue to coordinate with public and private housing and services agencies to deliver housing and community development activities in the Urban County area. Various agencies will continue to be invited to attend public meetings related to the CDBG program. The Urban County will continue to maintain and expand the outreach list for the CDBG program.

**Discussion**

See discussions above.

# Program Specific Requirements

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

### Introduction

The following provides additional information about the CDBG program requirements. No programs or projects funded in FY 2013-2014 or proposed to be funded in FY 2014-2015 are anticipated to generate program income.

- The Urban County also does not anticipate expending funding on Urgent Need activities, as defined by HUD as activities that:
- Pose a serious and immediate threat to the health or welfare of the community;
- Are of recent origin or recently became urgent;
- The state grant recipient is unable to finance the activity on its own; and
- Other sources of funding are not available to carry out.

A condition will generally be considered to be of recent origin if it is developed or became critical within the last 18 months.

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	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
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

## Discussion

The Urban County anticipates receiving \$856,820 in CDBG funds for FY 2014-2015. The Urban County plans to allocate 20 percent for planning and administration, 12.25 percent for public services, and the remaining 67.75 percent for housing and community development activities such as public facility and infrastructure improvement projects. Except for the 20 percent planning and administration funds (which is not required to have a low and moderate income benefit), 100 percent of the 80 percent CDBG funds (12.25 percent public services plus 67.75 percent housing and community development) will benefit low and moderate income persons through either "LMA" Low and Moderate Income Area or "LMC" Low and Moderate Income Limited Clientele eligibility criteria.