September 18, 2019

TO: Lake County Housing & Community Development Commission(HCDC) ARCs

FROM: Jodi Gingiss, Community Development Administrator

RE: Recommendation for Implementation of 2020-24 Consolidated Plan for Spending of HUD Grants

At three Advisory & Recommendation (ARC) meetings scheduled for this Friday, September 20, HCDC members will be discussing activities proposed for implementation of Lake County's new 2020-24 Consolidated Plan ("ConPlan") for the U.S. Department of Housing & Urban Development (HUD).<sup>1</sup> All community members are welcome. Public comment can be further gathered at subsequent meetings of the Housing & Community Development Commission (HCDC) in October and November 2019.

Staff recommends the HCDC implement the 2020-24 ConPlan in a new way that allows for strategic, prioritized investment. The Lake County 2020-24 ConPlan is grounded in the "On To 2050" plan authored by the Chicago Metropolitan Agency for Planning (CMAP). In that plan, CMAP headlines "Prioritized Investment" to "carefully target public resources to maximize regional benefits for mobility, the economic and quality of life for all residents". In the upcoming ARC meetings, the following recommended 2020-24 prioritized investments for HUD grants – will be discussed by ARC:<sup>1</sup>

FIVE YEAR 2020-24	Affordable Housing	Public Improvements	Public Services ARC
CONPLAN GOALS	ARC Activities	ARC Activities	Activities
1. Improve	HOUSING	IMPROVED POINTS OF	PROVEN MODELS &
homeless crisis	INTERVENTIONS	ENTRY IDENTIFIED IN	NEW SERVICES
response	IDENTIFIED IN GAPS	GAPS ANALYSIS <sup>1</sup>	IDENTIFIED IN GAPS
system	ANALYSIS <sup>1</sup>	GAPS ANALISIS	ANALYSIS <sup>1</sup>
2. Assist Persons		Facility Enhancements	Adaptive Equipment
with Special	See Note Below <sup>2</sup>	for People with	for People with
Needs		Disabilities	Disabilities
3. Maximize	PROVEN MODELS &		
Affordable	NEW DEVELOPMENTS	SITE ACQUISITION	FAIR HOUSING
Housing			
4. Prioritize			DOT-RECOMMENDED
Pathways for	N/A	ADAPTIVE REUSE OF	TRANSIT PILOTS/
Economic		COMMERCIAL SITES	EQUITY & INCLUSION
Mobility			PROGRAMS

<sup>&</sup>lt;sup>1</sup> The "Gaps Analysis of the Homeless Crisis Response System in Lake County" authored by the Corporation for Supportive Housing (CSH) will guide ConPlan implementation of Goal #1 to Improve Homeless Crisis Response System. Last month, the Homeless Assistance ARC met to review the CSH Gaps Analysis in detail. Going forward, the Homeless Assistance ARC will serve as HCDC liaison with HUD's Continuum of Care (the Lake County Coalition for the Homeless).



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<sup>&</sup>lt;sup>2</sup> Affordable Housing projects serving people with special needs will receive additional points when scoring applications for Goal #3.

The 2020-24 ConPlan spending must also address the following four identified priority needs:

- Ending Homelessness
- Inclusive Growth (as defined by CMAP in On To 2050)
- Housing Accessibility
- Borderless Transit

These needs represent some of our community's most difficult problems to solve. Addressing these problems requires new partners, new agency capacity and new project sites that can come together over the next five years to achieve these ConPlan goals. As the most impactful community development and affordable housing activities often involve a very lengthy project timeline, staff encourages the early identification in 2020 of larger strategic, multi-staged projects which may span the length of the upcoming Con Plan cycle.

To identify HUD-eligible new project development (e.g. mixed-income housing) or new service creation/expansion (e.g. mobile homeless outreach), staff recommends the HCDC *make early flexible commitments to strategic partners selected through a call for five-year projects* in ways that assist in the creation of the new development or service. This approach is common among counties and cities that identify impactful community projects addressing priority needs in the five-year planning process. Early grant funding commitments allow implementation partners to plan new projects/service expansion and to raise funds necessary to bring strategic solutions to Lake County. Advance commitments are allowed by HUD when identified in a five-year Consolidated Plan developed with the community and taken through the public process that occurs at HCDC meetings.

Advance commitments to large, strategic ConPlan projects may result in uneven timing of expenditures that must be balanced with HUD's annual grant expenditure timing requirements. Some funding sources require annual application rounds, which will continue.<sup>3</sup> Project spending (or lack thereof) can be balanced by program spending, which is more consistent, as approved by the HCDC in its Grant Funding Allocation Policy. Staff proposes that gaps in spending also be filled through a limited version of HCDC's annual grant funding application process (outlined below).

To achieve maximum transparency, staff recommends the following process:

- 1. *Completed*: Series of consultations as detailed in 2020-24 ConPlan.
- 2. *Completed*: Two Con Plan Public Hearings, with more to follow before final passage of 2020-24 ConPlan by Lake County Board in the second quarter of 2020.
- 3. Underway: Public ARC meetings to discuss implementation of 2020-24 ConPlan
- 4. <u>Proposed</u>: Imminent call for strategic new projects that may take up to five years to complete and can be scheduled flexibly, with HCDC guidance, to meet HUD's annual grant spending deadlines. These projects must address 2020-24 ConPlan goals and priority needs.
- 5. <u>Proposed</u>: Five-year projects and programs would be selected by ARCs in late 2019 and published in the Strategic Plan section of the 2020-24 ConPlan early in 2020. After at least two

<sup>&</sup>lt;sup>3</sup> Emergency Solutions Grant (ESG) and Video Gaming Revenue (VGR) grants will still be offered through annual application rounds (in the case of VGR as proscribed in Lake County VGR Fund Policy).

public hearings and 30 days public comment period, the 2020-24 Strategic Plan would be presented to Lake County Board for approval in the second quarter of 2020.

- 6. <u>Proposed</u>: Customary Annual funding application rounds will take place PY2020 to 2024 in support of:
  - a. Goal #1: Emergency Solutions Grant funding & New CDBG Public Service-funded activities necessary to address Gaps Analysis<sup>1</sup> – advised by the Homeless Assistance and Public Services ARCs, respectively.
  - b. **Goal #2**: All CDBG-Funded Facility Enhancements and Public Service-funded Adaptive Equipment for People with Special Needs advised by the Public Improvements ARC and Public Services ARCs, respectively.
  - c. **Goal #3**: New affordable housing projects (local government, non-profit agencies and/or developers) not previously identified in 2020-24 ConPlan (Affordable Housing ARC).
  - d. **Goal #4**: Any of the four proposed activities could be funded through either the fiveyear call for projects or subsequent annual application rounds until the need is filled. The Public Service ARC will review annual applications for DOT-Recommended Transit Pilots and Equity & Inclusion Programs. The Public Improvements ARC will review annual applications for small business development and adaptive reuse of commercial sites in support of 2020-24 ConPlan Goals.

	Call for Strategic Five-Year Projects	Limited Annual Application Round
Affordable Housing ARC <sup>4</sup>	Proven affordable housing models, vacant/abandoned properties redeveloped for housing, local government affordable housing initiatives, affordable housing development	AHP, HUD As Needed
Homeless Assistance ARC <sup>5</sup>	As identified by Gaps Analysis in consultation with HUD Continuum of Care (Lake County Coalition for the Homeless)	ESG, As Needed
Public Improvements ARC		
Public Services ARC <sup>6</sup>	Fair housing legal assistance, Equity & Inclusion Programs, proven homeless assistance models (e.g. rapid rehousing) plus new homeless/housing services identified as needs in the CSH Gaps Analysis	DOT- Recommended Transit Pilots

## **Summary Table**

<sup>&</sup>lt;sup>4</sup> The Affordable Housing ARC makes funding recommendations for the Lake County Affordable Housing Program in concert with its HUD grant recommendations.

<sup>&</sup>lt;sup>5</sup> The Homeless Assistance ARC will be advising on Emergency Solutions Grants (ESG) while also consulting with the other three ARCs and the Lake County Coalition for the Homeless (HUD Continuum of Care) on how best to address the gaps identified in our homeless crisis response system.

<sup>&</sup>lt;sup>6</sup> The Public Services ARC will also be advising on Lake County Video Gaming Revenue grant recommendations.