

City Council Action Memorandum

ТО:	Elizabeth Pauli, City Manager
FROM:	Felicia Medlen, Housing Division Manager, Community and Economic Development
	Tanja Carter, Director, Community and Economic Development
	Katie Johnston, Interim Director, Neighborhood and Community Services
COPY:	City Council and City Clerk
SUBJECT:	Resolution Authorizing Submittal of the 2025 Consolidated Plan to the US Department of
	Housing and Urban Development by May 15, 2025
DATE:	May 6, 2025

SUMMARY AND PURPOSE:

The purpose of this resolution is twofold. First, it is to provide the City Council (Council) an opportunity to review and comment on the 5-year Consolidated Plan, and funding recommendations for planned activities for the upcoming program year (PY), beginning July 1, 2025, and for approval to submit of the Consolidated Plan to the US Department of Housing and Urban Development. Second, this resolution serves to request approval from Council for City staff to execute three categories of agreements: 1) two subrecipient agreements between the City of Tacoma and the Tacoma Community Redevelopment Authority (TCRA): One Community Development Block Grant (CDBG) and one HOME Investment Partnership Program (HOME), 2) a third subrecipient agreement between the City, the TCRA, and the City of Lakewood for HOME activities, and 3) up to twenty agreements with individual subrecipients and/or contractors for program year 2024 CDBG and ESG funds administered by the City.

BACKGROUND:

CONSOLIDATED PLANNING

The 2025-2029 Consolidated Plan for the Tacoma-Lakewood HOME Consortium outlines a five-year strategy to address housing, human services, and economic development needs. It includes a Housing Needs Assessment, which highlights problems including cost burdens affecting 23% of households, a Market Analysis identifying challenges in affordability, homelessness, and economic stability, and a Strategic Plan with the following goals:

- Prevent/reduce homelessness and housing instability by supporting a wide range of services and facilities intended to prevent residents from becoming homeless and serving those experiencing homelessness.
- Support rental and homeowner opportunities through development of rental or homeownership properties.
- Advance economic opportunity by supporting the growth and sustainability of small businesses and microenterprises and investing in community-driven economic initiatives.

The City conducted community engagement, including public hearings, surveys, and consultations with stakeholders. The initial draft was open for public comment from October 7 – November 7, 2024, with a final draft, incorporating feedback, available for comment from March 31 – May 1, 2025, before submission to HUD.



City Council Action Memorandum

Yearly Annual Action Plans (AAPs) serve as administrative plans to ensure that annual spending decisions are furthering progress towards meeting the needs identified in the Consolidated Plan. Progress is measured and submitted to HUD at the end of the program year in the Consolidated Annual Performance and Evaluation Report (CAPER).

As part of the Annual Action Planning process, the City is tasked by HUD with determining local funding allocations and service delivery activities for CDBG, HOME and ESG programs for the upcoming program year, which occurs between July 1st and June 30th.

The City estimates allocations in the following funding amounts for program year 2025:

- CDBG: \$2,358,374
- ESG: \$210,394
- HOME: \$1,084,060

Funding recommendations for the allocations stated above are incorporated into the PY 2025 Consolidated Plan (Plan). This Plan is required by the Department of Housing and Urban Development (HUD) in order for the City to receive its entitlement funding. Recommendations for CDBG Community and Economic Development projects are made by the TCRA. Recommendations for CDBG Public Services and ESG projects are made by Neighborhood & Community Services (NCS) staff with input from the Human Services Commission and the Tacoma - Lakewood - Pierce County Continuum of Care.

The Plan also allocates HOME funds to be administered by the TCRA in support of Affordable Housing projects. Projects are identified in early spring during a competitive notice of funding availability (NOFA) led by the TCRA.

On May 6, 2025, staff will present the Plan to Council and seek final action on its submittal to HUD.

ANNUAL FUNDING RECOMMENDATIONS:

HOME funds.

HOME funds and a portion of CDBG funds are allocated by the City through two annual competitive funding HOME funds and a portion of CDBG funds are allocated by the City through two annual competitive funding opportunities managed by the Housing Division of the Community and Economic Development Department. The CDBG Community and Economic Development NOFA process, which allocates a portion of CDBG funds to minor capital projects, home repair, and microenterprise assistance, coincides with the Annual Action Planning process. An Affordable Housing NOFA process in the spring lays out larger scale housing projects and activities that are incorporated into the Plan at that time.

The TCRA is an independent, public development authority. TCRA members are appointed by the City Council and have the responsibility for reviewing and recommending programs that meet the CDBG and HOME Investment Partnership priorities related to housing and community and economic development initiatives. Individual service provider recommendations are based on the examination of each application received, review of past performance, availability of funding and applicable interviews conducted.



City Council Action Memorandum

The HOME allocation is administered within a HUD-approved consortium whose members include the cities of Tacoma and Lakewood. Oversight of all HOME activities is conducted by the TCRA. The HOME funds are used primarily for permanent affordable rental housing and affordable homeownership. These projects are coordinated through a network of non-profit and for-profit developers and local service providers.

The Neighborhood and Community Services Department developed the spending plan for ESG and CDBG Public Services funds. Funding recommendations will be presented to the HSC and the CoC. Recommended activities are aligned with Council priorities as well as HUD-eligible services. Specifically, ESG funds can be used for the following program components: street outreach, emergency shelter, homelessness prevention, and rapid re-housing. There is a cap on street outreach and emergency shelter; no more than 60% of the total annual HUD allocation may be used for any combination of these two categories. There is a cap on street outreach and emergency shelter; no more than 60% of the total annual HUD allocation may be used for any combination of these two categories. A portion of the funds are also dedicated to administration and planning, and to support operations of the Homeless Management Information System (HMIS). These activities are coordinated through a network of subcontractors and/or subrecipients and oversight is provided by the Neighborhood and Community Services Department.

PROPOSED SPENDING PLAN FOR 2025 CDBG, ESG, AND HOME PROGRAMS

CDBG

Of the anticipated CDBG grant allocation of \$2,358,374, 20% (\$471,674) is set aside for administrative purposes correlating with the management of the City's CDBG program. Over 50% (\$1,232,944) is proposed for housing assistance and just over 10% (\$300,000) is to be allocated to fund economic development activities. Recommended allocations are presented in Table 1. Allocations are consistent with Council priorities and HUD eligibility requirements.

Total Available 2025	\$2,358,374
Uses:	
Administration (20% cap)	\$471,674
Public Service Grants (15% cap)	\$353,756
Housing Assistance Programs	\$1,232,944
Economic Development	\$300,000
Total Uses	\$2,358,374

TABLE 1: COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

CDBG Community and Economic Development NOFA

The CDBG Community and Economic Development (CED) NOFA for PY 2025 was released on October 15, 2024, to identify projects that will receive funds allocated for Housing Assistance and Economic Development. The application period closed on November 22, 2024. In total, eight (8) applications were received. Two (2) applicants proposed housing assistance activities, and six (6) applicants proposed economic development microenterprise



City Council Action Memorandum

assistance activities. Staff screened each application to confirm its general eligibility under federal program requirements.

Additionally, staff reviewers independently rated all eight (8) applications. Ratings are based on each project's alignment with City Council funding priorities and other considerations such as cost effectiveness, program need, the project's ability to leverage CDBG funds, past performance, collaboration efforts, staff capacity, fiscal responsibility, and completeness of the application.

TCRA Funding Recommendations

Following staff review, eligible applications and staff ratings are presented to the TCRA. Based on anticipated funding levels, a total of \$936,000 in CDBG funds are being made available for award to Community and Economic Development programs. Of this amount, the TCRA recommends \$636,000 for housing assistance projects and \$300,000 for economic development activities. If the allocation approved in the upcoming Congressional budget differs from anticipated funding levels, the amounts will be adjusted as described in Table 2. If approved through the Plan, the projects and amounts in Table 2 will be funded beginning July 1, 2025.

TABLE 2. I CRA RECOMMENDATIONS FOR CED NOTA			
Organization	Program	Estimated Amount	
Rebuilding Together South	Community Revitalization		
Sound (RTSS)	Partnership	\$572,000	
Associated Ministries of			
Tacoma-Pierce County	Paint Tacoma Beautiful	\$64,000	
Revby LLC	Microenterprise Assistance	\$125,000	
Tacoma-Pierce County	Microenterprise Assistance	\$175,000	
Chamber of Commerce			
	Total	\$936,000	

TABLE 2: TCRA RECOMMENDATIONS FOR CED NOFA

Once the CDBG allocation for PY2025 is released by HUD, the following adjustments will be made if needed:

- If the award is greater than the estimated amount- Add additional funds to the RTSS project up to their full funding request of \$636,000, after updating the Administration (20%) and Public Services (15%) allocations. Any remaining funds will be added to the City/TCRA Single Family Residence Rehabilitation Loan (SFR) Program.
- If the award given is less than the estimated amount- TCRA will reduce funds from the City's SFR program, after updating the Administration (20%) and Public Services (15%) allocations. Any remaining reductions needed will be made from the City/TCRA SFR Program.

CDBG Public Services

Fifteen percent (\$353,756) of CDBG funds are allocated for public service programs, which represents the maximum percentage of CDBG funds allowed by HUD for this use. Recommendations are reviewed by the HSC and the CoC before they are presented to City Council for final action and submitted to HUD as part of the 2025 Annual Action Plan. Programs to be funded are outlined in Table 3.



IABLE 3: HSC RECOMMENDATIONS FOR CDBG PUBLIC SERVIC			
Estimated Amount			
\$353,756			
\$353,756			
sed by HUD, the			
following adjustments will be made if needed:			
• If the award is greater than the estimated amount: The			
difference will be added to Temporary and/or Inclement			
Weather Shelter.			
• If the award given is less than the estimated amount: The			
difference will be taken from Temporary and/or Inclement			

TABLE 3: HSC RECOMMENDATIONS FOR CDBG PUBLIC SERVICES FUNDS

ESG

Of the \$210,394 ESG grant allocation, an Administration cap (for City staff costs) is set at 7.5% (\$15,750). 2.5% (\$5,200) is proposed for staff oversight of the Homeless Management Information System (HMIS), a localized information system used to collect client-level data and service provision activities. The remaining funds (\$189,444) are to be allocated for external contracts. Recommended allocations for external contracts are presented in Table 5. Recommendations are presented to the HSC and the CoC before they are presented to City Council for final action and submitted to HUD as part of the 2025 Annual Action Plan. Recommended activities are consistent with Council priorities and HUD-eligible activities.

		¢240.204
Total Available 2025		\$210,394
Uses:		
Administration (7.5% cap)	7.5%	\$15,750
HMIS Operations (2.5% cap)	2.5%	\$5,200
External Contracts	90%	\$189,444
Total Uses 2025	100%	\$210,394

TABLE 4: EMERGENCY SOLUTIONS GRANT (ESG)

Once the ESG allocation for PY2025 is released by HUD, the following adjustments will be made if needed:

• If the award is greater than the estimated amount: The difference will be split proportionately based on current allocation percentages between shelter and rapid re-housing (keeping in mind the 60% cap for shelter).

• If the award given is less than the estimated amount: The difference will be absorbed equally across all uses (keeping in mind the 60% cap for shelter).



City Council Action Memorandum

TABLE 5: HSC RECOMMENDATIONS FOR ESG FUNDING (EXTERNAL CONTRACTS)

Program	Estimated Amount
Temporary and/or Inclement Weather	
Shelter	\$126,234
Rapid Re-Housing	\$63,210
Total	\$189,444

HOME

Of the HOME grant allocation of \$1,084,060, an Administration cap is set at 10% (\$108,406). The remaining 90% (\$975,654) is proposed for City of Tacoma Housing Programs and the City of Lakewood. Recommended allocations are presented in Table 6.

Total Available 2025	\$1,084,060
Uses:	
Administration (10% cap)	\$108,406
Housing Programs	\$721,984
City of Lakewood (estimate)	\$253,670
Total Uses	\$1,084,060

Through the Annual Action Plan process, HOME funds are allocated by the City Council to the TCRA for oversight. Each program year, the TCRA leads a competitive process to identify HOME-funded programs in support of permanent affordable rental housing, affordable homeownership housing, and down payment assistance.

SUBRECIPIENT AND SUBCONTRACTOR AGREEMENTS

City staff will request authority from the City Council to enter into three (3) subrecipient agreements with the TCRA: one (1)agreement being for PY25 HOME funds in the amount of \$830,390 in support of permanent affordable rental housing, administration, affordable homeownership housing, and down payment assistance; one (1) being for PY25 CDBG funds in the amount of \$1,704,618 in support of administration and housing activities; and one (1) subrecipient agreement with the TCRA and the City of Lakewood in the amount of \$253,670 to administer and carry out PY25 HOME activities under the Tacoma-Lakewood HOME Consortium.

City staff will also request authority from the City Council to execute up to twenty (20) agreements with subrecipients and/or contractors for PY25 CDBG funds up to the total amount of \$653,756 for CDBG economic development and public service activities; and PY25 ESG funds up to a total amount of \$210,394 for ESG administration, emergency shelter, HMIS, and rapid re-housing.

COMMUNITY ENGAGEMENT/ CUSTOMER RESEARCH:



City Council Action Memorandum

During a 30-day period, beginning on March 31, 2025 and ending on May 1, 2025, the public was invited to make written comment on the Plan. A public hearing was held during a regular City Council meeting on April 22, 2025. To notify the public, the City published a legal ad in The News Tribune summarizing the contents of the Plan and outlining the opportunity to make written or verbal comment. In addition, the information was distributed via email, and published in the Tacoma Daily Index.

As a HUD grantee, the City is required to provide a summary of comments received and why the comments were accepted or rejected when submitting the Plan. The City's requirements for seeking public input on the plan are outlined in the City's Participation Plan.

2025 STRATEGIC PRIORITIES: Equity and Accessibility: (Mandatory)

Eligibility criteria for CDBG, HOME, and ESG grant activities are set by HUD. Households and small business owners earning 80% or less of Tacoma/Pierce County Area Median Income (AMI) must benefit from recommended projects included in the Plan. ESG funds are used for projects providing services to those who are at risk of, or are currently, experiencing homelessness. Efforts will be made to ensure that historically underrepresented populations are aware of program requirements and benefits. The City allocates its funds citywide. The Equity Index score for the following indicators reflect the citywide score.

Economy/Workforce: Equity Index Score: Moderate Opportunity

Increase the number of Tacoma households that have livable wage jobs within proximity to the city. Increase the number of diverse livable wage jobs.

Livability: Equity Index Score: Moderate Opportunity

Improve health outcomes and reduce disparities, in alignment with the community health needs assessment and CHIP, for all Tacoma residents

Decrease the percentage of individuals who are spending more than 45% of income on housing and transportation costs.

Increase positive public perception of safety and overall quality of life.

Explain how your legislation will affect the selected indicator(s).

The recommended projects outlined in the Plan have been selected for their ability to address needs and goals outlined in the 2025-2029 Consolidated Plan for housing, community and economic development, homeless assistance, and social services. The City of Tacoma will aim to accomplish the following goals through implementation of the Plan:

- Prevent/reduce homelessness and housing instability Through funds for a wide range of services and facilities intended to prevent residents from becoming homeless and serving those experiencing homelessness. These funds also support critical and minor home repairs.
- Support rental and homeownership opportunities These funds contribute directly to the development of affordable rental and homeownership housing units. These funds also contribute to a down payment assistance program which helps eligible households purchase a home and build equity.



City Council Action Memorandum

ALTERNATIVES:

The alternatives presented in this report are based on review and analysis of each application for funding and staff's best judgement of program activities that will lead to the preferred outcome as established in the PY 2025 Annual Action Plan, which will be submitted to HUD for review and approval on or before May 15, 2025. Other options could include, but are not limited to, changing the funding mix between activities or between individual service providers. Further alternatives might include revamping the way these services are procured and the types of activities the City wishes to pursue. Changes of this nature would require intensive staff review and would likely jeopardize the HUD-imposed May 15, 2025, Annual Action Plan submittal deadline. It is suggested that any alternatives such as these be pursued after the May 15th date and rolled into a current year plan amendment or addressed in future years' program activities.

Alternative(s)	Positive Impact(s)	Negative Impact(s)
1. Not approve the plan as	Further customize federal	Jeopardize the HUD-imposed
presented and change funding	program funding to meet local	deadline for submittal of the
mix between activities or	needs	Plan
between individual service		
providers		
2. Not approve the plan as	Further customize federal	Jeopardize the HUD-imposed
presented and revamp the	program funding to meet local	deadline for submittal of the
way services are procured and	needs	Plan
the types of activities the City		
wishes to pursue		
3. Address the above	Further customize federal	No negative impacts are
alternatives in future years'	program funding to meet local	anticipated from this
program activities	needs	alternative

EVALUATION AND FOLLOW UP:

Progress towards the annual goals will be reported in the City's 2025 Consolidated Annual Performance and Evaluation Report following the close of the program year on June 30, 2026.

STAFF/SPONSOR RECOMMENDATION:

Staff recommends approving the Plan as presented.

FISCAL IMPACT:

Please provide a short summary of the fiscal impacts associated with the grant, agreement, policy action, or other action.

Fund Number & Name	Cost Object (cc/wbs/order)	Cost Element	Total Amount
1195- CED Federal Grants	730100 – CED Economic	4331281 -Dir	\$2,358,374
	Grants	Fed HUD	
		CDBG	



City Council Action Memorandum

	730100 – CED Economic	4331280 - Dir	\$1,084,060
	Grants	Fed HUD	
		Home	
	730100 – CED Economic	4331282- Dir	\$210,394
	Grants	Fed HUD ESG	
TOTAL			\$ 3,652,828

Are the expenditures and revenues planned and budgeted in this biennium's current budget? YES

These grant funds are budgeted in the 2025-2026 biennium.

Are there financial costs or other impacts of not implementing the legislation? YES

Failing to approve the Plan, and as a result, failing to submit the Plan to HUD, will result in the delay or loss of the City's CDBG, HOME, and ESG funds, and prevent implementation of programs and projects that will provide considerable benefits to the community.

Will the legislation have an ongoing/recurring fiscal impact? YES

Will the legislation change the City's FTE/personnel counts? No

ATTACHMENTS:

Draft Tacoma-Lakewood HOME Consortium 2025 Consolidated Plan Form of City-TCRA HOME Subrecipient Agreement Form of City- TCRA CDBG Subrecipient Agreement Form of City, TCRA, and Lakewood Subrecipient Agreement