

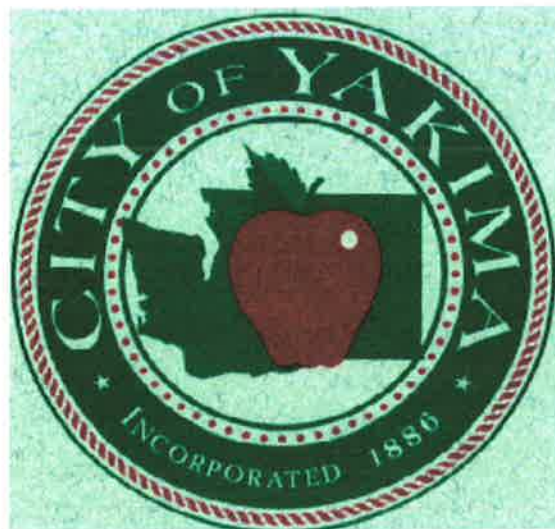
The City of Yakima

Office of Neighborhood Development Services

DRAFT

Consolidated Annual Performance Evaluation
Report

For Year of 2016



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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Each year the City of Yakima receives funding from the Federal Government for two entitlement programs; Community Development Block Grant (CDBG) funds and HOME Investment Partnership (HOME) funds.

The City of Yakima continues to use the bulk of it's CDBG funding to address "Single Family Rehabilitation" in the form of a "Senior/Disabled Emergency Repair Program" that assists qualified low to moderate income senior and/or disabled homeowners with emergency type repairs to include, no heat, no power, no hot water, leaking pipes, leaking roof or other such emergency repairs. The Single Family Rehabilitation program also includes an Exterior Paint program and a Wheel Chair Ramp program for qualified low to moderate senior and or disabled homeowners.

CDBG funds also assists four eligible activities in the Public Service category of National Objectives. The first is a funding of public service programs administered through South East Community Center for low to moderate income citizens. The second is a Landlord Tenant Hotline administered through the Office of Neighborhood Development Services to provide Landlord/Tenant advice as well as information material for both Landlords and Tenants explaining Washington States Landlord Tenant regulations in order to provide "Affirmatively Futhering Fair Housing" as required by HUD. The third eligible activity supported by CDBG through the Public Service category is a "Micro-enterprise assistance" to support existing micro-enterprises as well as giving technical assistance to new micro-enterprises. The fourth public service is provided directly to low to moderate homeowners through the Paint out graffiti program in addressing graffiti which directly affects lower income residential areas of Yakima.

CDBG has also supported the eligible activity of Code Compliance in order to enable the Yakima Code Department to further assist low to moderate income areas with the continued clean up efforts associated with Code Compliance through assisting the payroll of staff.

The HOME program continues to support local Community Housing Development Organizations (CHDO) such as Yakima Valley Habitat for Humanity in purchasing vacant lots or lots that have vacant/abandoned buildings that are substandard and in need of abatement. The qualified CHDO in partnership with the City of Yakima constructs a new single family dwelling which is then sold to a qualified low to moderate first time

homebuyer. Also in 2016 HOME funds were used to assist the local Yakima Housing Authority to rehabilitate existing multi-family apartment units that supply affordable housing to qualified low to moderate income tenants.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)
 Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected - Strategic Plan	Actual - Strategic Plan	Percent Complete	Expected - Program Year	Actual - Program Year	Percent Complete
Administrative HOME costs	Affordable Housing	HOME: \$	Other	Other	1	1	100.00%	1	1	100.00%
Code Compliance	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	2500	3298	131.92%	1050	3298	314.10%
Community Development Block Grant Administration		CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%
Community Housing Development Organization	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	2	2	100.00%	4	4	100.00%

Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	7	7	100.00%	7	7	100.00%
First Time Homeownership Program	Affordable Housing	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	1	2	200.00%	2	4	200.00%
New Construction	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	1	0	0.00%			
New Construction	Affordable Housing	HOME: \$	Rental units rehabilitated	Household Housing Unit	1	1	100.00%			
New Construction	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	1	2	200.00%	4	4	100.00%
Public Facilities and Infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	1	0	0.00%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	3349	133.96%	7100	7732	108.90%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	4	1	25.00%	4	1	25.00%

Public Services	Non-Housing Community Development	CDBG: \$	Other	Other	7500	8752	116.69%	7500	8752	116.69%
Single Family Rehabilitation Program	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	100	90	90.00%	100	90	90.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Yakima continues to use it's CDBG funds to the best of it's ability in assisting low to moderate income citizens through a variety of programs such as the Senior/Disabled Emergency Home Repair Program as well as it's Public Service programs, code compliance and Microenterprise assistance program the city continues to exceed it's goals.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	80	0
Black or African American	5	0
Asian	0	0
American Indian or American Native	1	0
Native Hawaiian or Other Pacific Islander	0	0
Total	86	0
Hispanic	63	4
Not Hispanic	86	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		1,273,107	559,008
HOME		2,111,290	18,676

Table 3 – Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
CITY OF YAKIMA	100	100	One hundred percent of the allocation was spent within the geographic location (City Limits)

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City of Yakima does not limit either CDBG or HOME Investment funds to any limited target area, but uses these funds to the best of it's ability to assist any and all low to moderate income applicants that qualify within the programs funded within in the entire City Limits of Yakima.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG funds are leveraged with partnerships with non-profits such as OIC of Washington in the continued operation of the South East Community Center to provide community service programs to low and moderate income citizens. CDBG funds are also leveraged through a partnership with Rural Community Development Resources in providing Microenterprise assistance to both new and existing small businesses.

Home Investment funds are used in partnership with local Community Housing Development Organizations such as Habitat for Humanity to construct new single family residential homes to be sold to qualified low to moderate income first time homebuyers, as well as other local affordable housing developers and owners.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	15,694,986
2. Match contributed during current Federal fiscal year	1,200
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	15,696,186
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	15,696,186

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year									
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match	
1013 N. 2nd St.	12/31/2016	0	0	0	0	1,200	0	1,200	

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period						
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period		
\$ 759,040	\$ 0	\$ 0	\$ 0	\$ 759,040		

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8– Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		1		31,000		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	8
Number of Non-Homeless households to be provided affordable housing units	100	90
Number of Special-Needs households to be provided affordable housing units	25	32
Total	125	130

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	4	4
Number of households supported through Rehab of Existing Units	100	90
Number of households supported through Acquisition of Existing Units	0	0
Total	104	94

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The goals set were from past experience associated with the number of average applicants assisted during an average year. Outcomes are the actual numbers assisted and therefore subject to change depending upon need, available funding and the actual cost of material and labor which is subject to change depending upon a wide and varied number of factors.

Discuss how these outcomes will impact future annual action plans.

As with any estimate, factors must be weighted, measured and calculated through experience, as with past annual action plans, future annual action plans must be carefully considered as to potential funding amounts, cost associated with accomplishing the task and weighted against the need.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	30	22
Low-income	38	0
Moderate-income	22	0
Total	90	22

Table 13 – Number of Persons Served

Narrative Information

CDBG single family rehabilitation program served a Senior/Disabled homeowners with emergency repairs, wheel chair ramps and exterior paint, CDBG was also used to assist low to moderate income microenterprise assistance.

HOME funds were used through a qualified Community Housing Development Organization (CHDO) which in 2016 was Yakima Valley Habitat for Humanity that completed four homes.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Yakima continues to work with the local Homeless Network of Yakima County to assist unsheltered homeless persons, but with limited and dwindling federal resources many programs funded with CDBG and HOME funds have been reduced over the past several years.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Yakima continues to work with the Homeless Network of Yakima County to provide emergency shelters at various locations throughout the city as well as working with the Yakima Housing Authority to provide transitional housing for the homeless.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Yakima Office of Neighborhood Development Services continues to operate a Senior/Disabled Emergency home repair program to assist individuals to stay in their homes and not become displaced through disrepair of their homes. Many individuals are referred to this program through local health care facilities that are looking to send these individuals home after care, but emergency repairs such as grab bars/ wheelchair accessible bathrooms or wheelchair ramps are needed before the homeowner can return.

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

The City of Yakima continues to work with agencies such as the local Housing Authority, Yakima Valley Habitat for Humanity, the Catholic Diocese of Yakima as well as the Homeless Network of Yakima county to assist the homeless within the city limits of Yakima.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The Yakima Housing Authority (YHA) offers affordable housing through a variety of programs. Each program is designed to meet the need of our community.

- **Housing for Families;**YHA offers two housing programs for low income families. The first is the Family Housing/Low Rent Program which has 150 units at scattered sites across Yakima. Rent is determined based on family income.
- **The Housing Choice Vouchers-Section 8 Program;** Eligible families will receive rental assistance and can rent from any landlord that accepts Section 8 vouchers. Unit size and maximum rent limits apply
- **Housing for the Homeless;** YHA subsidizes 75 units located throughout Yakima County specifically set aside for individuals and families that qualify as homeless. YHA has partnered with several no-for profit organizations which allow eligible tenants to receive assistance with health care, substance abuse and job training.
- **Housing for Veterans;** YHA offers a Section 8 Voucher Program specifically for Veterans who also qualify as homeless under the Veterans Affairs Supportive Housing Program (VASH).
- **Housing for Farmworkers;** YHA owns and manages 173 units throughout Yakima County which are set aside for farmworkers and their families. Reduced rents and rental assistance may be available.
- **Housing for the Elderly;** YHA owns and manages a 38-unit apartment building in Yakima for the elderly. In order to qualify for the one-bedroom units, the individual and his or her spouse must be 62 or older.
- **Housing for the Disabled;** YHA offers a Section 8 Voucher Program specifically for Non-Elderly Disabled Individuals through the NED Voucher Program.

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

The Yakima Housing Authority encourages resident involvement with programs like our Resident Advisory Board (RAB). The (RAB) provides the YHA and the residents with a forum for sharing information about the Agency's Annual Plan. RAB membership is comprised of individuals who reflect and represent the residents assisted by the PHA. The role of the RAB is to assist the PHA in developing the PHA Plan and in making any significant amendment or modification to the Plan. In addition, Yakima Housing Authority is an active participant in crime free rental housing which allows our residents to be a part of the local block watch and we participate every year, inviting our residents and local organizations, in the National Night Out.

The YHA also participates in the Yakima County Asset Building coalition and they are establishing a partnership with YV-CAN for the Union Gap and Yakima area. YHA is also in the process of collaborating with the AmeriCorps VISTA Educational Project with the goal of every eligible resident signing up for the college bound scholarship.

Lastly, YHA is administering the Family Self-Sufficiency (FSS) Program. This program enables families assisted through the HCV program to increase their earned income and reduce their dependency on welfare assistance and rental subsidies.

Actions taken to provide assistance to troubled PHAs

The Yakima Housing Authority is not designated as "Troubled".

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The Yakima city council is an elected body chosen by the citizens of Yakima and as the governing body is able to direct the Yakima City Manager as to managing changes negative or otherwise concerning public policies that serve as barriers to affordable housing within the cities control concerning land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations and policies affecting the return on residential investment.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Due to the continued reduction of federal entitlements, the ability to take action to address ever growing obstacles to meet the needs of underserved citizens continues to grow. The City of Yakima continues to assist its citizens to the best of it's ability as directed by the Yakima City Council as the elected and governing body representing the citizens of Yakima through the programs described throughout this document, the cities Annual Action Plan and five year Consolidated Plan as approved by HUD.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City of Yakima continues to strive to increase it's Economic Development avenues to increase available local jobs that pay reasonable living wages. The City continues to seek to establish new businesses as well as commercial manufacturing and agricultural opportunities to broaden the employment avenues available to it's poverty-level families.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Institutional structure is expanded as needed and as funding allows.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The City of Yakima continues to partner with both public and private housing agencies, such as the Yakima Valley Habitat for Humanity, the Yakima Catholic Diocese Housing Services and the local Yakima Housing Authority to address affordable housing issues within the city limits of Yakima. The City also communicates with a large variety of social service agencies through several committees in which both city council members and/or city staff attend.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Any impediments identified by the City of Yakima are addressed on an individual basis and then addressed by either the individual city department with the expertise to do so, or assigned by the Yakima City Manager as directed by the elected governing body, the Yakima City Council.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The city of Yakima's Office of Neighborhood Development Services is regularly monitored by both Region 10 HUD monitors and by the Washington State Auditors office as to program compliance and comprehensive planning requirements per mandated Federal HUD regulations. Both of these monitoring reports are available through HUD and the Washington State Auditors office through the "Public Disclosure Act".

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

As defined and described within the City of Yakima "Citizen Participation Policy" as adopted by Yakima City Council Resolution #R-2010-34.

A fifteen day written comment period is conducted as advertised in both the Yakima Herald newspaper and the El Sol newspaper, along with two public meetings which are advertised at least 15 days prior to the scheduled meetings that are held before the Yakima City Council and held in order to provide public the opportunity to comment on the annual Consolidated Annual Performance Evaluation Report, as mandated by HUD. The City also posts the CAPER on the city's website so that it can be easily downloaded and reviewed.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Due to the limited Community Development Block Grant (CDBG) funds the City of Yakima has received in the past several years of significantly reduced allocations a number of long term worthwhile programs have been eliminated. The City of Yakima continues to use the bulk of its CDBG funds to assist to keep low to moderate Senior and/or Disabled homeowners in their homes and from becoming displaced and/or homeless due to deterioration of their residences. Due to the limited funding and continued rising requests for assistance in these programs, the City is unable to assist in other areas of growing concern, such as expanding and assisting the homeless. It is the City's objective to continue to assist at risk elderly and disabled homeowner to remain in their homes and not become displaced and further add to the rising homeless numbers.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City of Yakima's Office of Neighborhood Development Services has a number of HOME assisted projects that are on a revolving inspection schedule. In 2016 "Pear Tree Place" located at 2900 Powerhouse Rd." was scheduled and inspected as it is scheduled to be every two years.

- one two bedroom unit
- two one bedroom units
- two three bedroom units

Each were inspected using "Housing Quality Standards, Code Requirements and Deteriorated Paint Visual Assessment Inspection Checklists.

Each unit passed inspection with no building systems or components failing inspection.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The following actions are taken by the City of Yakima to evaluate the success of its Affirmative Fair Housing Marketing Policy and that of its Grantees:

- The City of Yakima assess the results of its affirmative Fair Housing Marketing Plan annually with a summary of "Good faith efforts" taken by its Grantees in the CAPER.
- The City of Yakima compares the information compiled in the manner described under Section V and Section VII above and evaluates the degree to which statutory and policy objectives were met. If the required steps were taken, the City of Yakima will determine that good faith efforts have, in fact, been made.
- To determine results, the City may examine whether specific groups in the city's service area applied for or owners of HOME- or CHDO-funded units that were affirmatively marketed. If the city finds that specific groups are represented, particularly Hispanics, African Americans, Asians, American Indians, persons with disabilities, and women, the City will assume that the Marketing Plan procedures were effective. If one or more groups are not represented within the context of existing neighborhood composition, the City will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

- The city of Yakima will take corrective action if it is determined that a Grantee has failed to carry out Affirmative Marketing efforts as required. If a Grantee continues to neglect responsibilities made incumbent by the terms of the HOME or CHDO Agreement, the City will consider taking action to rectify the problem with th Grantee.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

1. 1420 Cherry Ave

- \$2,574 Program Income
- Units-1
- #bedrooms -3
- Median Income -60%
- Hispanic/Latino
- Family size -3
- Single Parent Household

2. 1423 Karr Ave -\$11,194.77

- Units-1
- #Bedrooms -3
- Median Income
- Hispanic/Latino -No
- Family size -2
- Single Non Elderly

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City of Yakima continues to work with the local Yakima Housing Authority, as well as qualified Community Housing Development Organizations (CHDO) in reviewing affordable housing needs in Yakima. The City of Yakima partners with qualified CHDO's to construct affordable housing and sets aside the HUD required 15% of it's HOME entitlement for that endeavor, yet every year the need increases as does the amount of the cities monetary participation ofttimes far exceeding the 15%; although HOME entitlement funds continue to shrink as the Federal Regulation of the program expands and administration costs associated with meeting those federal regulations continues to expand and grow.