

City of Biddeford
Citizens Advisory Committee
August 24, 2022 5:30 PM Council Chambers & Zoom
<https://biddeford.zoom.us/j/92414142091?pwd=MmtDak94ZGxyeUE5TGZEcUJzOE91UT09>
ID # 924 1414 2091 Passcode: 957908

Status: Citizen's Advisory Committee Meeting 8-24-22 5:30 PM Second Floor Conference Room & Zoom

- 1. Call to Order**
- 2. Adjustments to the Agenda**
- 3. Staff Business/Announcements**
- 4. Consent Agenda**
 - 4.1. Approve Meeting Minutes from June 8, July 7 & July 27
[DRAFT CAC Meeting Minutes 6.8.22.pdf](#)
[DRAFT CAC Meeting Notes 7.7.22.pdf](#)
[DRAFT CAC Special Meeting Minutes 7.27.22.pdf](#)
- 5. New Business**
 - 5.1. Update on Apex Program
 - 5.2. Allocation priorities to meet timeliness requirements
VOTE: Williams Court improvements
ADA prioritization update
Other Projects
[072622 Housing Survey Results.pdf](#)
[Affordable Housing Task Force update.pdf](#)
[Details on 4\(b\)\(iii\) agenda item.pdf](#)
 - 5.3. Update on Ward meetings
- 6. Old Business**
 - 6.1. Project/Program Updates
 - a. CDBG, CDBG-CV, and ADA Self-Evaluation and Transition Plan
 - b. Seeds of Hope update
- 7. Other Business**
 - 7.1. Relevant Meeting/City Updates
 - a. Planning Board process update
 - b. Affordable Housing Risk Force
- 8. Adjourn**

City of Biddeford
Citizens' Advisory Committee
June 8, 2022 5:30PM - ZOOM
Topic: Citizens' Advisory Committee

Present: Bates, Bey, Edwards, George, Schaffer, Turner

Staff: Smallwood, Wilkerson

1. OPEN CAC MEETING

- a. Cat Bates, Chair – 5:34p

2. AGENDA REVIEW

3. APPROVE MEETING MINUTES

- a. Move: Edwards, Second: Bey, Vote: Unanimous

4. DISCUSSION (10 min)

- a. Mapping / engagement (event report, survey rollout, meetings)
 - i. Edwards report on Pollinator Fest, successful outreach day
 - ii. Next Steps (Smallwood): Schedule Ward Meetings; promo survey roll out (in Beat, etc.); Table at summer events (La Kermesse, Chamber Fest, Family Fun Fest, River Jam, etc).
 - iii. Ward meetings: July and August (7 total); first session planned as more of a “listening session” (Smallwood will send out calendar coordinated with staff and council)
 - iv. Save the Date: September 28 – National Neighborhood Day – get it started this year, collaboration with existing groups like HoB for small effort

5. PROJECT/PROGRAM UPDATE (40 min)

- a. CDBG, CDBG-CV, and ADA Self-Evaluation and Transition Plan
 - i. Smallwood –
 - 1. CDBG update: Seeds of Hope contract signed and payment dispersed; Meals on Wheels in process this week; Apex conversation next week with HUD representative
 - 2. CDBG-CV: under review with HUD
 - ii. Wilkerson –
 - 1. 2-4 Unit Program – no new applications; 2 new units under contract; \$175,000 across 6 units committed (under budget per unit); 7 more units eligible this month
 - a. Review of submitted comments from tenant testimony from last meeting
 - b. HUD Requirements: 51% MUST meet LMI requirements (duplexes 1 unit), bring up to current code
 - c. Terms in CAC control: grant or loan; liquid asset requirements; tenancy, etc.

- d. Demographics of current program participant owners fall into generally three groups: LMI folks themselves with low/substandard credit; fixed income/cannot take on more debt; passed down property owners (no intent to leave)
 - e. Demographics of those who do not pursue the program: 30-somethings category with more future movement, etc.
 - f. Code Inspection Program – for multi-units of more than 3 units, per unit \$25/year, inspected every 5 years (end of 5 year cycle upcoming). Their rationale was code is updated every 3 years, so then it keeps owners on timeline. All properties in the 2-4 Unit Program are automatically enrolled in the property assessment to keep them accountable.
- b. Discussion of CAC perspectives on modifications of 10-year timeline
 - i. Focus of values: community connection; keeping real affordability; avoiding absentee landlords; potential of helping people build equity
 - ii. Input from landlord/applicant Al Zullo – focus on property, not individual for mandates/accountability
 - iii. Next steps: Wilkerson solicits recommendations for program; Schaffer suggests amending how properties are coded to give us full vision of what exists in housing and what needs help (housing demographic data); Wilkerson/Smallwood will put together language for next meeting to vote on program amendment
- c. Draft of upcoming Action Plan (budget review, programs review, 2- to 4-unit rehab review)
 - i. Abigail can build the 2-unit program amendment into AP – will check with HUD representative on allowability
- 6. OTHER BUSINESS (5 minutes)**
 - a. Zoom/Hybrid Discussion
 - i. Vote: CAC will remain Hybrid, with in person and online components (Abigail will follow up with details on procedure)
 - 1. Move: Edwards, Second: Turner, Vote: Unanimous
 - b. Clifford Park Subdivision
 - i. Edwards update on development; Schaffer questions around planning equity; Turner concerns on breaking precedent on protected lands
- 7. RELEVANT MEETING/CITY UPDATES (5 min)**
 - a. Comprehensive Plan – new planner starts Monday; will reset final timeline
 - b. Affordable Housing Task Force – Doris absent; fill out survey/promote
 - c. Homeless Task Force
- 8. ADJOURN**
 - a. Move: George, Second: Bey, Vote: Unanimous

City of Biddeford
Citizens' Advisory Committee
Thursday, July 7, 2022 5:00PM
Topic: Citizens' Advisory Committee Public Hearing and Meeting

In attendance

Members: Cat Bates (chair), Leah Schaffer (vice chair), Doris Ortiz

Guests: Melissa Cilley (Apex Youth Connection)

Absent: Stephanie Edwards, Ronda Bey, Loretta Turner, Kaily George

Staff: Abigail Smallwood, Gail Wilkerson

1. **OPEN PUBLIC HEARING:** Opened by Chair Bates, 5:00pm
 - a. Review the Year 5 Action Plan
 - i. Staff (A. Smallwood) provided an overview of the Action Plan for the year
 - b. Take comments
 - i. Guest (M. Cilley) shared difficulty implanting social service program under the CDBG regulations and there was discussion about how to improve ease of implementation
2. **CLOSE PUBLIC HEARING:** Closed by Chair Bates, 6:00pm
3. **OPEN CAC MEETING:** Opened by Chair Bates, 6:00pm
4. **AGENDA REVIEW**
5. **APPROVE MEETING MINUTES**
 - a. There was not quorum, so there was no vote to approve the minutes and no votes were taken during the meeting.
6. **DISCUSSION**
 - a. Plan for Social Services, based on comments received during Public Hearing
 - i. Further discussion around how to make social service programs easier to implement, about what to do with any potential leftover funds (decision was to have a special meeting to discuss this once Apex has submitted an application with details on their proposed program)
 - b. Consolidated Plan / long-term planning
 - i. Discussion around using city's civic engagement platform to help with long-range planning and support idea submission (A. Smallwood to discuss with other engagement staff)
 - c. **VOTE:** Amendment to Rehab Program
 - i. There was not quorum, but those in attendance were supportive of the changes. Recommendation to do a vote via email, which will be sent to all members soon. Video of discussion at the meeting will be included.
 - d. Review Ward meeting schedule

- i. New department head and deputy department head are having individual meetings with department staff; A. Smallwood to discuss schedule, implementation, and details at her check-in meeting

7. PROJECT/PROGRAM UPDATE

- a. CDBG, CDBG-CV, and ADA Self-Evaluation and Transition Plan
 - i. Rehab program update from G. Wilkerson: same number of units; working on a one-page form about the program for outreach; if rehab program amendment is approved, will reach out to previous applicants who preferred a shorter time period
 - ii. ADA: will provide list of potential projects for CAC to discuss

8. OTHER BUSINESS

9. RELEVANT MEETING/CITY UPDATES

- a. Planning Board process update
 - i. A. Smallwood will be discussing this in meeting with new department heads
- b. Affordable Housing Task Force
 - i. Councilor Ortiz provided an update: at the last meeting, Habitat for Humanity presented; initial results from the community housing survey were reviewed; discussion about what income range to focus Affordable Housing funds on
 - ii. Discussion around whether the Task Force will also make policy proposals to City Council; L. Schaffer and Councilor Ortiz to discuss, and staff will discuss internally as well

10. ADJOURN: Chair Bates closed the meeting at 7:02pm.

City of Biddeford
Citizens Advisory Committee
July 27, 2022 5:30 PM City Hall 2nd Floor Conference Room & Zoom

Minutes

1. Open CAC Special Meeting

1.1. Abigail opens meeting at 5:35pm

2. Agenda Review

3. Discussion

3.1. Review of Social Service application

- Middle School Homeless Liasson (AKA Empowerment Program Manager) Position is losing NON-CDBG Funding, @CDBG funding doesn't quite meet program need (~\$21k available, ~\$35k needed)
- Empowerment Program Manager serves as single-point resources for students experiencing or at risk of homelessness, and their families.
- Apex's ability to meet documentation requirements is still to be determined.
- Loretta asks how many students are served?
 - ~15x
- Leah asks if McKenney Vento status would serve as documentation?
 - TBD
- Cat asks if school could be designated provider and manager of documentation, sub-contracting APEX employee to fill position
- Discussion of shifting Service funding to fully fund Empowerment Program Manager
 - Abigail recommends keeping Seeds funding as-is, looking into shifting some funding from Meals on Wheels (who is presumed to have access to other resources)
- Hud has suggested adding benchmark requirements to APEX programing, regular check-ins to ensure ongoing compliance w/documentation requirements
- Cat motions to fund Apex Empowerment Program Manager position, pending documentation plan acceptance, with the condition of added check-ins, and a convo with Meals on Wheels about shifting funding out of their program.
 - Leah Seconds
 - All in favor

3.2. Discuss Social Service funding allocations

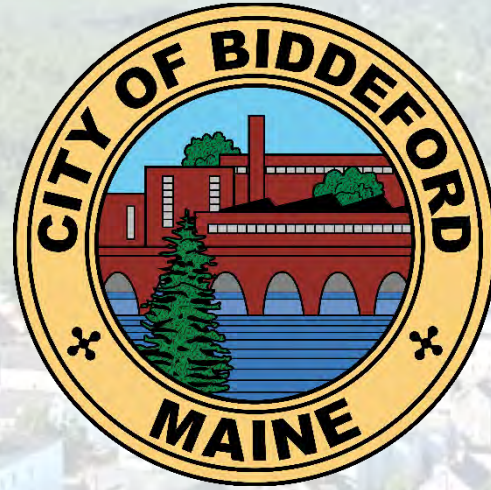
- How to proceed with ~\$60k in social service funding, moving forward?
- Leah notes that in prior years there has been CDBG focus on infrastructure (side walks, gardens, etc.. Asks what category these expenditures fall into?
- Is housing a category of its own?

- Is there a Social Service category that can address housing/homeless concerns
 - Yes, housing counseling could fit. Acquiring property would need to come from non-social services pool of money (the big pot)
- Leah Suggests pairing a building project with social service
 - Address need for units AND need for housing education/support
 - Bring up funding for surveying & architect fees
 - Enable adding new units
 - Facilitate down-town infill at sub-market rates.
- Concept of renovating a building to add General Assistance units mentioned
- Job training and Small biz education program mentioned
 - Collaboration with Center of Technology?
- Loretta asks if the city owns residential (or convertible) properties?
 - How many?
 - Can we request a list?
 - Abigail is working on this. We may need to push for it as a group
- Leah suggests we ask for list of ALL city-owned property, cull it our selves
 - Leah offers to work on finding eligible & appropriate properties on the list, once secured.
 - Suggestion that ask for list be public, to push action
 - General consensus that Adding units is a good goal.
- Convo on format of fund allocation to continue.
 - General support of having bi-annual reapplication of programs

3.3. If time, discuss priority areas for ADA improvements, and review budget and timeliness requirements for program year

- No discussion

4. **Adjourn at 6:40pm**



Housing Survey Results

Mayor's Affordable Housing Task Force

July 26, 2022

Three Sets of Results

- General Survey – Live in Biddeford
- General Survey – Don't live in Biddeford but would like to
- Developer Survey

General Survey Distribution

- Facebook targeted advertisement
- Biddeford Beat
- Website
- Press Release
- Non-sponsored social media posts
- McArthur Library
- Seeds of Hope
- BSOOB Transit (on buses and at Transportation Center)

Live in Biddeford

General Survey

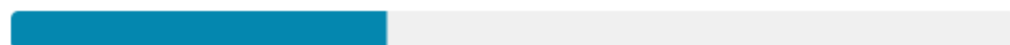
✓ 7 Which of the following applies to you?

561 out of 630 people answered this question

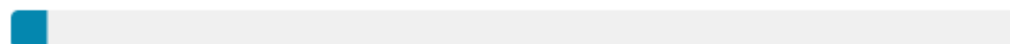
I rent my home 331 resp. 59%



I own my home 210 resp. 37.4%



I am unhoused 20 resp. 3.6%



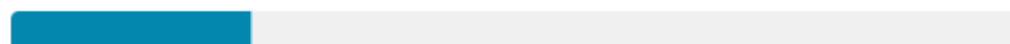
✓ 8 If you rent, would you like to own?

331 out of 630 people answered this question

Yes, I would like to own. 252 resp. 76.1%



No, I would not like to own. 79 resp. 23.9%



What do you consider to be an affordable housing cost?

- **Studio**

- Mean: \$845.24
- Median: \$800

- **1 Bedroom**

- Mean: \$986
- Median: \$1,000

- **2 Bedroom**

- Mean: \$1,236.35
- Median: \$1,200

3 Bedroom

Mean: \$1,478.48

Median: \$1,500

4 Bedroom

Mean: \$1,732.64

Median: \$1,700

Responses vs. FMR

Survey Responses: What do you consider to be an affordable housing cost?

- **Studio**
 - Mean: \$845.24
 - Median: \$800
- **1 Bedroom**
 - Mean: \$986
 - Median: \$1,000
- **2 Bedroom**
 - Mean: \$1,236.35
 - Median: \$1,200
- **3 Bedroom**
 - Mean: \$1,478.48
 - Median: \$1,500
- **4 Bedroom**
 - Mean: \$1,732.64
 - Median: \$1,700

Fair Market Rents for Biddeford (HUD)

- **Studio**
 - \$961
- **1 Bedroom**
 - \$967
- **2 Bedroom**
 - \$1,216
- **3 Bedroom**
 - \$1,561
- **4 Bedroom**
 - \$1,790

Survey Responses vs. Pricing Today

- **1 Bedroom**

- Median: \$1,000

- **2 Bedroom**

- Median: \$1,200

- **3 Bedroom**

- Median: \$1,500

- **1 Bedroom**

- 1,175 - 1,400 - 2,200

- **2 Bedroom**

- 1,500 - 1,550- 1,625- 1,775- 1800- 1850- 2,000

- **3 Bedroom**

- 2,100

Mill District Pricing



RATES

Apartments rates range in prices based on square footage, views, and finishes. Current rates are as follows:

- Standard Studio Starting at \$1300
- Standard One Bedroom Starting at \$1500
- Standard Two Bedroom Starting at \$1800
- Luxury One Bedroom Starting at \$1900
- Luxury Two Bedroom Starting at \$2500

Residential Lofts

Studio, 1 Bath

486 - 772 sq. ft

\$1,350 - \$1,595 | No Availability.

1 Bedroom, 1 Bath

581 - 872 sq. ft

\$1,595 - \$1,795 | No Availability.

2 Bedroom, 1 Bath

720 - 1,093 sq. ft

\$1,850 - \$2,195 | No Availability.

2 Bedroom, 2 Bath

966 - 1,143 sq. ft

\$2,495 - \$2,695 | No Availability.

21 Have you lost your housing within the past year or do you expect to lose your existing housing within the next year?

559 out of 630 people answered this question



23 Do you know anyone who needed to leave their housing in Biddeford within the past year due to affordability?

559 out of 630 people answered this question



- Those who responded “yes” to having lost their housing were asked to elaborate:
 - General increases in rent
 - Rents were increased after sale of their building
 - Building was sold and they were forced to move



24

If the City were able to help you achieve better housing affordability, how important would the following be to you on a scale of 1 to 5, with 1 being not at all helpful and 5 being very helpful:

510 out of 630 people answered this question

	1	2	3	4	5
Down payment assistance to buy a home	19.2%	8%	15.7%	13.9%	43.1%
Rental assistance to help me afford my current housing	20%	9.5%	21.8%	17.7%	31%
More housing developments where homes are affordable	9.1%	5.1%	15.2%	16.6%	54%
More housing developments where rentals are affordable	8.9%	4.2%	12.7%	17.4%	56.8%
Improving the condition of my current rental unit/building	24.2%	14.7%	21.9%	14.7%	24.6%
Rehabilitation assistance to help me improve the condition/energy efficiency of my home	23.4%	11.6%	23.2%	15.1%	26.6%

Should the City encourage "alternative housing" options in Biddeford?

558 out of 629 answered

Yes

453 resp. 81.2%



No

105 resp. 18.8%



Comments

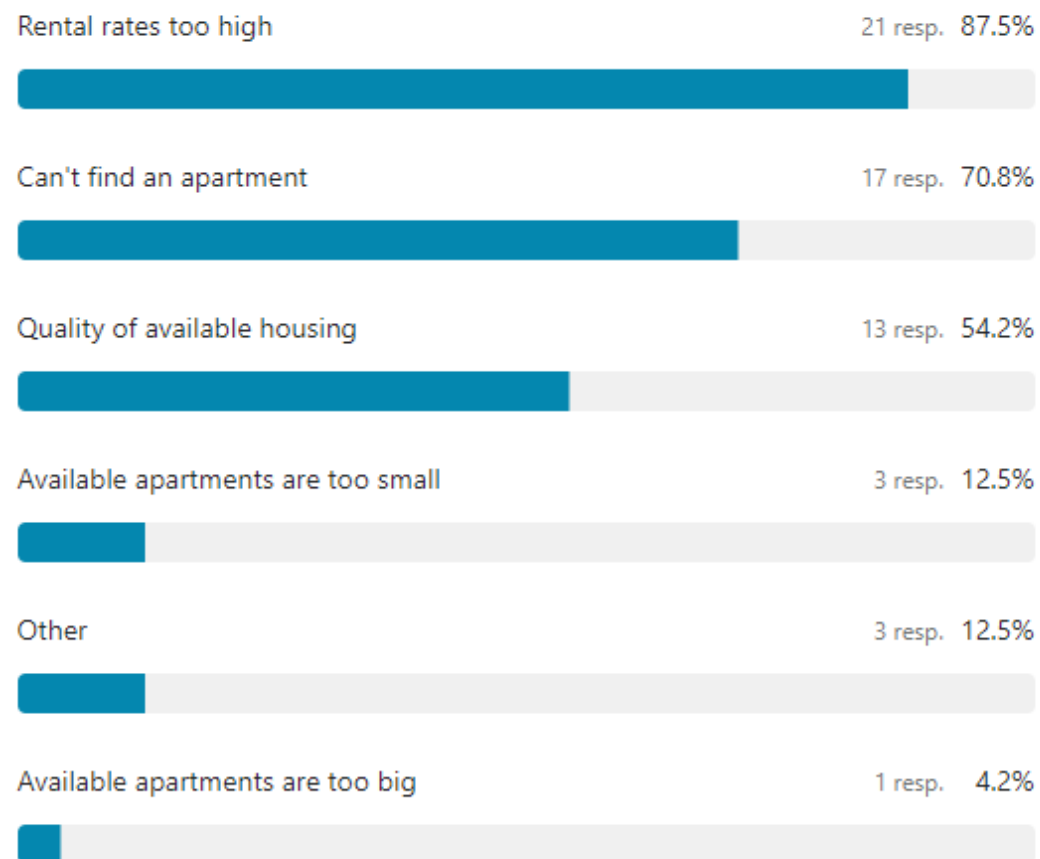
- Hard to summarize such a range of thoughts
- Concerns about investors (specifically from out of state) purchasing properties in Biddeford; desire for local buyers first access
 - Adding more supply, specifically affordable
 - Support for zoning changes to allow more supply
 - General sense of fear from respondents about not being able to stay in their homes
 - Concerns about short-term rentals
 - Rental caps
 - Quality of buildings
 - Concerns about affordability for single people
 - Down payments

Don't live in Biddeford, but
would like to

General Survey

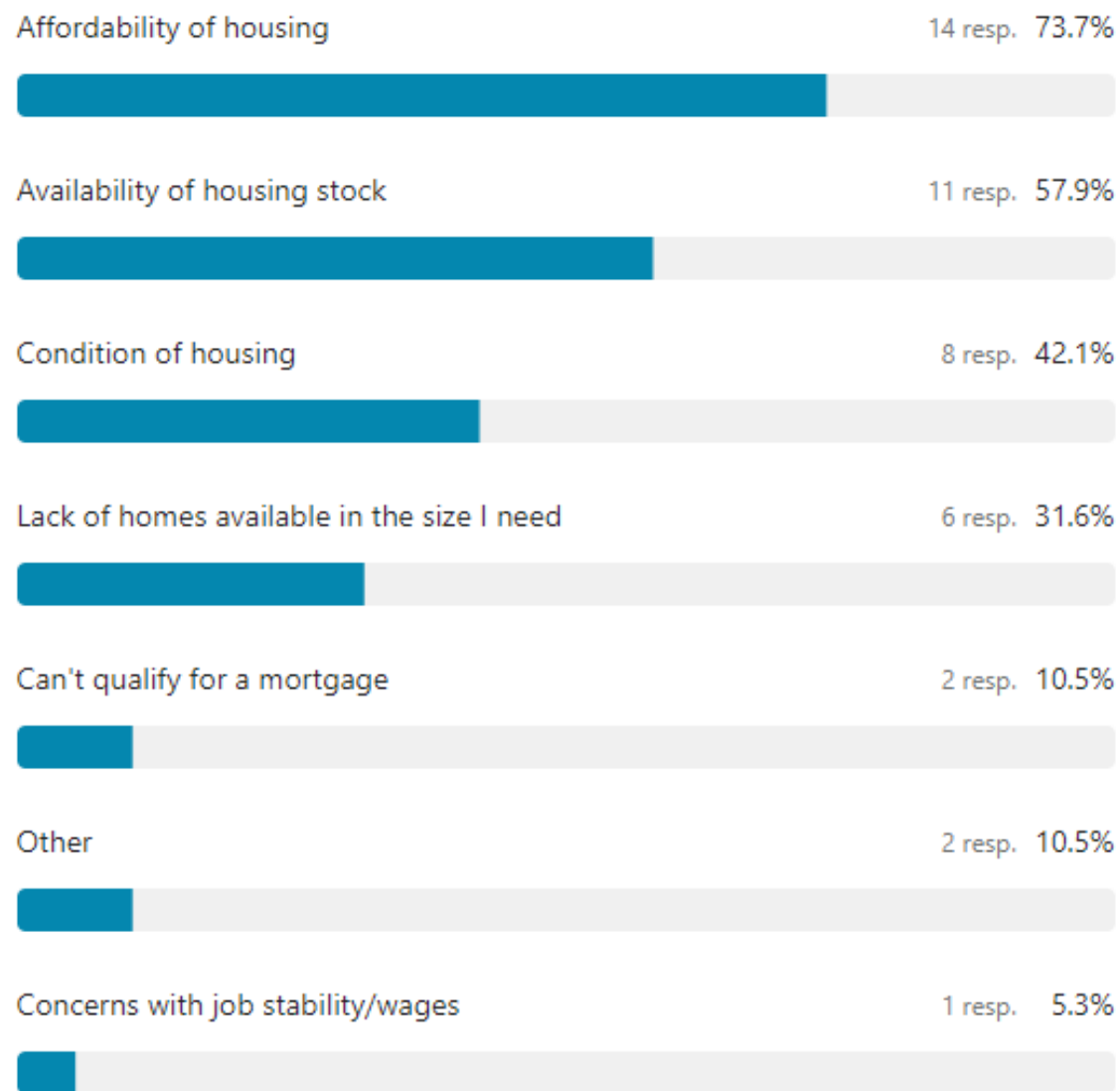
✓ 4 What factors keep you from renting in Biddeford?

24 out of 630 people answered this question (with multiple choice)



✓ 5 What factors keep you from purchasing a home in Biddeford?

19 out of 630 people answered this question (with multiple choice)



Developer Survey Results

Distribution

- Contacts from Code Enforcement for multi-family owners
 - Many owners did not have an email address on file
- Contacts from our housing rehabilitation and lead remediation programs
- Developer contacts from the Economic Development Department
 - Biddeford developers
 - Known affordable housing developers from around the state
- Total contacts: 80
- Total responses: 27

-  2 Of the following barriers to developing affordable housing that are outside the City of Biddeford's control, please rate how much each factor affects you on a scale of 1 to 5, with 1 being no effect and 5 being a major effect.

23 out of 27 people answered this question

	1	2	3	4	5
Cost of Labor	0%	0%	13%	34.8%	52.2%
Cost of Land	4.3%	8.7%	30.4%	26.1%	30.4%
Cost of Private Financing	17.4%	8.7%	26.1%	8.7%	39.1%
Cost of Materials	0%	0%	8.7%	43.5%	47.8%
Availability of State/Feder...	13.6%	13.6%	13.6%	22.7%	36.4%
Community Opposition	9.5%	23.8%	38.1%	19%	9.5%



3

Of the following barriers to developing affordable housing that are within the City of Biddeford's control, please rate how much each factor affects you on a scale of 1 to 5, with 1 being no effect and 5 being a major effect.

23 out of 27 people answered this question

	1	2	3	4	5
Plan Review/Approval Process	9.1%	9.1%	36.4%	13.6%	31.8%
Impact Fees	0%	13.6%	36.4%	36.4%	13.6%
Codes/Ordinances/Land Use Restrictions	0%	13%	30.4%	17.4%	39.1%
Availability of financial assistance from the City	0%	13.6%	31.8%	18.2%	36.4%
Site Availability	4.3%	30.4%	21.7%	17.4%	26.1%

Other barriers not on the list

- “Zoning preventing the addition of units to or existing multi family buildings”
- “Allowing higher densities in growth areas with water and sewer”
- “High taxes and fees for the building. It’s hard to do any affordable housing if I have to pay so much just to keep the building running”
- “Affordable housing is not being built because cost of construction and now interest rates are such that the developer can’t make the deal pencil (no profit or even under water). Financial assistance via TIF, state and fed tax credits and any other assistance to fill the financing gap is needed to build affordable housing.”



5

How much would each of the following factors help assure your ability to develop affordable housing in Biddeford on a scale of 1 to 5, with 1 being not at all helpful and 5 being extremely helpful?

23 out of 27 people answered this question

	1	2	3	4	5
Availability of a skilled local construction...	0%	4.3%	30.4%	34.8%	30.4%
Access to low-cost private financing	9.1%	4.5%	4.5%	22.7%	59.1%
Availability of affordable housing tax increment...	4.3%	0%	13%	17.4%	65.2%
Site availability	0%	4.3%	34.8%	39.1%	21.7%
Less restrictive codes/ordinances/lar use	4.3%	8.7%	30.4%	17.4%	39.1%
Streamlined plan review/approval process	8.7%	0%	26.1%	30.4%	34.8%

Other factors not on this list

- Multiple comments about allowing additional units on existing properties
- “Continuous and dynamic community engagement is an important factor that often gets overlooked. This requires a planning mentality at the City level.”
- “Allow federal funding opportunities to be passed down without unrealistic or overly controlling conditions.”
- “Available surveyor”

People who HAVE done business in Biddeford

11 Compared to other communities that you have done work in, how would you rate the following aspects of doing business with the City of Biddeford?

9 out of 27 people answered this question

	1	2	3	4	5
Knowledgeable of regulations	0%	0%	22.2%	77.8%	0%
Good relationship with the State	0%	11.1%	44.4%	44.4%	0%
Explains which Codes are relevant to your project	0%	11.1%	22.2%	55.6%	11.1%
Explains steps that needs to be taken to get a building permit	0%	0%	22.2%	55.6%	22.2%
Understands the zoning code and addresses concerns about project feasibility	0%	11.1%	33.3%	44.4%	11.1%
Understands State's new zoning regulations	11.1%	11.1%	33.3%	33.3%	11.1%

Perception of people who HAVE NOT done business in Biddeford

9 In your perception, how would you rate the following aspects of doing business with the City of Biddeford in comparison to other communities?

9 out of 27 people answered this question

	1	2	3	4	5
Knowledgeable of regulations	0%	22.2%	66.7%	11.1%	0%
Good relationship with the State	11.1%	0%	88.9%	0%	0%
Explains which Codes are relevant to your project	11.1%	22.2%	44.4%	22.2%	0%
Explains steps that needs to be taken to get a building permit	12.5%	0%	62.5%	25%	0%
Understands the zoning code and addresses concerns about project feasibility	22.2%	22.2%	44.4%	11.1%	0%
Understands State's new zoning regulations	0%	37.5%	50%	12.5%	0%



14

Rank the following types of written materials that would you like the City to provide to help you complete projects efficiently.

18 out of 27 people answered this question

#1	Checklists to outline what steps will need to be taken to complete your project successfully	#2.11 average
#2	Easy to find and clear to read zoning regulations	#2.22 average
#3	Lists of City resources that may be available to you to create affordable housing opportunities	#3.17 average
#4	Information about current events regarding potential changes in zoning and other policies that may impact your project	#3.56 average
#5	A guide to explain which department to engage with for each step of the development process	#3.94 average

▼ View details

Final Thoughts

- Allow the addition of units to existing multi family properties
- Someone to meet with to let me know what is available for help with this
- Pursue pattern zoning and pre-approved building types, provide micro-TIFs to help cover gap for projects that provide rents at 80%-120% ami, remove layers of regulation and fees for in-town projects.
- It would be great to develop some pre-approved housing types. It would also be great to identify City-owned land and make it shovel-ready for these pre-approved types.
- Treat small landlords and owner occupied with similar freedoms as the developers are treated instead of artificially creating extremely life-limiting conditions in order to access funding to assist with projects.
- I feel that the codes department is not on board with finding ways to increase density unless it fits into current zoning requirement which is too restrictive generally.
- Making sure any fees are defined, easy to calculate, and predictable.

Affordable Housing Task Force

At the July 26 meeting, the Housing Survey Results were shared (provided as a separate attachment). Here are major themes (thanks to Gail for putting this together):

- What most respondents think of as "affordable" rents are pretty much in line with the median rent (50th percentile) and FMR (40th percentile):
 - Studio: \$800/median; FMR: \$961/mo
 - 1 BR: \$1,000/median; FMR: \$967/mo
 - 2 BR: \$1,200/median; FMR: \$1,216/mo
 - 3 BR: \$1,500/median; FMR: \$1,561/mo
 - 4 BR: \$1,700/median; FMR: \$1,790/mo
- Top three ways the City can help individuals with Rental/Housing Affordability:
 - More housing developments where RENTALS are affordable
 - More housing developments where HOMES are affordable
 - Down-payment assistance to help me buy a home
- Top three ways the City can help small and large developers create affordable housing:
 - Zoning changes to allow greater density on/in existing properties
 - Assistance with TIF funding and other low-cost private financing credit
 - City-owned property/pattern zoning projects that are 'shovel ready' for ease of review

In addition, the Task Force recommended updates to Council's 5-Year Housing Goals, as follows:

- Increase from 90 to 180 per year the number of affordable units created or preserved

At the upcoming August 23 meeting, the AHTF will be asked to:

- Affirm their recommendation that the City's goal to preserve/create affordable units increase from 90 units per year to 180, or 18% of all current units and 12.5% of all rental units by 2028;
- Consider use of the affordable housing fund (e.g., supporting the unhoused, creating new/preserved affordable units)
- Discuss inclusionary zoning (using Portland as a case study of what has worked and what has not)
- Consider non-monetary means of supporting affordable housing development (density bonus, ADUs, relaxed parking requirements, etc)

Potential Projects

The main ideas that have been discussed thus far:

- (1) conversion of existing structures into affordable units (giving the City another tool to acquire for sale or donation to developers of all sizes for rehab and occupancy); and
- (2) support people experiencing homelessness (in terms of via acquisition and then sale or donation of a property to a service provider), especially given that we have maxed out the social services CDBG dollars.

This ties in with information learned through the Affordable Housing Task Force, which is provided in a separate document.

There are other things that CDBG funds can support (e.g. senior centers, youth centers, neighborhood facilities, child care centers, etc., but these would all need a service component and haven't necessarily risen to the level of urgency that affordable housing and homeless response have).