

Avenue Northline

Equitable Development Plan

Developed in partnership with







Avenue Northline

Equitable Development Plan

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Together we will build a strong, safe, supportive and connected community. Our civic life will be anchored by a new community center, and we will have quality parks and open spaces. Our neighborhood will be home to great schools, quality affordable housing and sound public infrastructure. Our voice as a community will get stronger as we work together towards realizing our vision.

01 Introduction

The Northline neighborhood is approximately 4 miles north of downtown Houston and is a majority Hispanic neighborhood composed of working families and individuals. Avenue began comprehensive community development work in the neighborhood in 2015 and the neighborhood, led by its resident leadership, has developed a comprehensive plan for their community guided by the following vision:

Together we will build a strong, safe, supportive and connected community.

Our civic life will be anchored by a new community center, and we will have quality parks and open spaces. Our neighborhood will be home to great schools, quality affordable housing and sound public infrastructure. Our voice as a community will get stronger as we work together towards realizing our vision.

This vision will inform and form the backbone for this Northline Equitable Development Action Plan.

The purpose of the plan is to develop a series of goals around the vision of quality affordable housing and to develop strategies that can be implemented to help achieve these goals, taking input from the community and grounding the overall work in data. If successful, the plan will help the community to achieve redevelopment without displacement, the heart of equitable neighborhood development.

In 2015 Avenue expanded its area of outreach to the north, moving north of Loop 610 into the Northline neighborhood. Initially this expansion was led by its Community Initiatives team which is Avenue's comprehensive community development arm. Avenue has been conducting comprehensive community development (CCD) in the neighborhood immediately to the south for 10 years. Avenue sought to deploy this same model in Northline.



A principle tenant of Avenue's CCD model is community engagement and development of resident leadership. In Northline this process involved an array of engagement strategies at different stages of the process. These strategies included resident surveys, listening sessions, community meetings, focus groups and establishment of a resident leadership team. The objective of the process was to help the community establish a vision for its neighborhood and ultimately a plan to achieve that vision.

Along the way, several information gathering studies were done and these provided the necessary factual data and information to inform the eventual vision and plan. The first plan was "Northside/ Northline—Super Neighborhood 45" produced

by the University of Houston Community Design Resource Center in conjunction with Avenue CDC (2015 and updates). This provides a comprehensive analysis of the neighborhood including information on the population, educational attainment, income and housing, among other topics. The second study was performed in 2016 by the Reinvestment Fund for Avenue and the Wells Fargo Regional Foundation, a major funder of Avenue's Northline efforts. This study provided additional socioeconomic and housing data to inform the community's efforts. Both studies are included by reference to this plan and are attached. Below is a summary of some of the data provided by these studies which help to form a basis for this Northline Equitable Development Action Plan.

The Northline area has been deeply studied over the last several years by Avenue and its partners.

02 | About Northline

In brief, the Northline Community is:

- · Predominantly Hispanic
- · Low income
- Young
- Low educational attainment compared to Houston
- Predominantly single-family residences that are getting older
- Roughly the same homeownership rate as Houston
- Many home owners and renters that are cost burdened
- Desirous to preserve its single family characteristics
- Beginning to feel the approach of gentrification, particularly on the southern end.

These characteristics will inform the action plan to follow.

Demographics

The Northline area has been deeply studied over the last several years by Avenue and its partners. Below is a series of demographic highlights for the community. Much more can be found in the reports and studies noted.

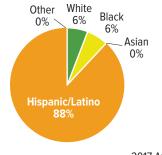
The Northline Super Neighborhood, of which our study area is a part, is a predominantly Hispanic community of just under 60,000. The population is 88% Hispanic compared to an overall city proportion of 44%. The Hispanic share of the population in Northline has also increased significantly since 2000, rising from 72% to 88% with a complementary reduction in the White population of 20% to 6%.

Other 2% White 25%

Hispanic/ Latino 44%

Asian

Northline Neighborhood



2017 ACS



Like many Hispanic communities in Houston the composition is significantly younger than Houston at large with 34% of the population being 0-17 years compared to 26% for Houston overall (ACS 2013). Additionally the neighborhood has a lower median income than Houston overall, with the median income being \$32,018 in the Super Neighborhood compared to \$45,728 for Houston (ACS 2014). The trend has also been negative for median household incomes dropping from \$39,587 in 2000 to \$36,055 in 2010 and \$32,018 in 2014 (Census 2000 and 2010, ACS 2014, adjusted 2014 dollars).

The Super Neighborhood also has a lower level of educational attainment than Houston at large, though the trend has been improving in an absolute sense as it has across Houston as a whole. In 2014, 50% of residents in the Super Neighborhood had a high school diploma compared to 76% in Houston overall. For the Super Neighborhood this is an improvement from 42% in 2000 and for the City an improvement from 70% (Census 2000 and 2010, ACS 2014).

Gentrification/ **Revitalization Trends**

Like many Inner Loop and Inner Beltway communities in Houston, the first shoots of a trend to gentrification are beginning to appear in the Northline area. This is evident is some of the data trends related to this undertaking but has also been evident in our day-to-day observations in the community and City at large.

For a number of years Houston, like many large urban cities, has been experiencing a renaissance in its urban core, with significant numbers of people moving back into the City's center. This was first observed in Houston 15 - 20 years ago in neighborhoods not far from Northline including Houston Heights and the Old Sixth Ward, the first neighborhood Avenue operated in when it was founded in 1991. In fact, Avenue has moved its affordable housing efforts three times due to increasing land prices due to this general trend. Avenue first moved from the Sixth Ward to the First Ward and then subsequently to the Near Northside. This move has been followed by our most recent move to Northline.

88%

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The general trend has been a radial gradient emanating from Downtown, with the greatest changes being closest in to the City's core and decreasing as you move out radially from the center. This is evident in trend data provided to Avenue by NALCAB.

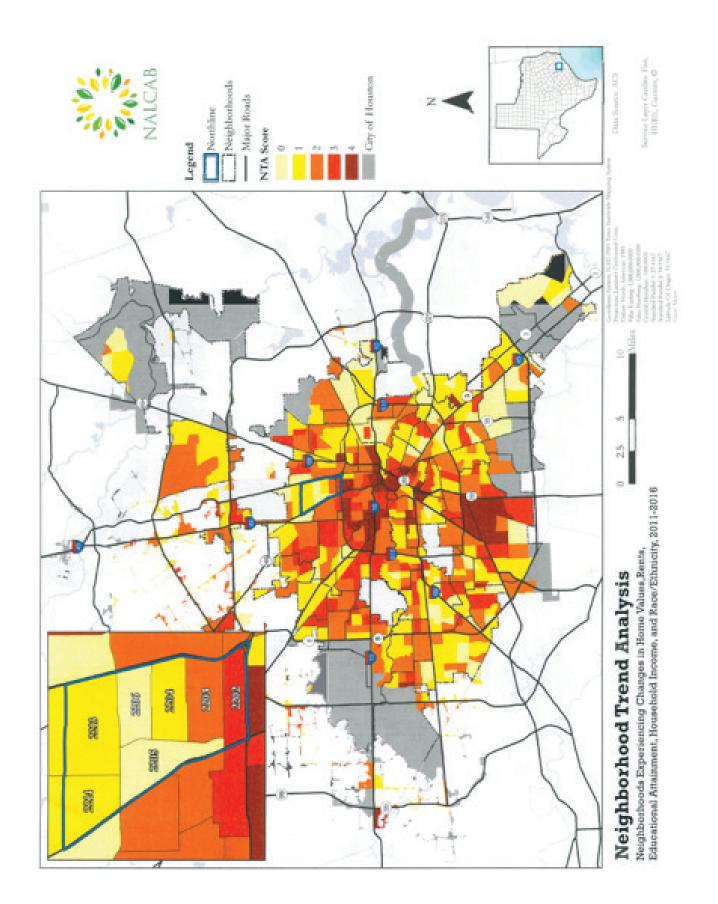
NALCAB's Neighborhood Trend Analysis tool gives each census tract a score based on temporal trends in data for home values, rents, household income, educational attainment and race/ethnicity to score a census tract from 0 to 4 for its trending to or risk for gentrification. On the following page is a map for the City of Houston using this tool and scoring system and for the study area's 7 census tracts.

The radial trend from the City's Downtown is evident particularly for the census tracts in the north and northwest, including those for Northline. The Near Northside, where Avenue has been doing community development and affordable housing development.

opment for the last 10 years and immediately to the north of Downtown, clearly shows this radial trend for gentrification. Increasing land prices in the Near Northside, a harbinger of gentrification, have now caused Avenue to move into the Northline area.

As can be seen in the inset for the Northline study area in the upper left hand corner, the radial trend is evident in Northline as well. The farthest south census tract 2202 has a score of 3 indicating it is at significant risk for gentrification and 2203 immediately to its north shows risk as well. The more northern census tracts still show a relatively low risk for gentrification. Fortunately, it appears there is still time to shift the trend from gentrification to revitalization for the community and Avenue's equitable development plan as enumerated herein will seek to do that.

Northline Neighborhood Trend Analysis



Avenue's community development focus area data indicates that in 2014 44% of residents owned their homes, slightly lower than Houston's average.

03 | Housing Data

The Northline Super Neighborhood is located approximately 4 miles to the north of Downtown Houston and is generally bounded by 610 on the south, I-45 on the West, Canino Road on the north and the Hardy Toll Road on the east. The study area for this grant is slightly smaller, not including some of the areas to the north that are included in the Super Neighborhood, but the characteristics are similar throughout both areas.

The neighborhood is a comprised of small subdivisions with a compact and regular block pattern. The predominant housing type is single family detached with a number of apartment complexes along the I-45 corridor. Adjacent to I-45 is also the neighborhood's largest commercial district. The I-45 / Crosstimbers intersection used to be home to the former Northline Mall which was demolished in 2007 and replaced by a successful power center anchored by a large Wal Mart with many surrounding junior anchors and smaller stores.

As noted previously the housing stock is predominantly single family detached, comprising just under

70% of all housing units, significantly more than Houston at large (46%, 2013 ACS). Much of this housing was built in the 1950's to the 1970's. The figure on the following page shows the distribution by census tract of the age of the housing stock for the study area. Multi-family housing comprises just 17% of all housing compared to 36% for Houston.

Avenue's community development focus area data indicates that in 2014 44% of residents owned their homes, slightly lower than Houston's average. Data also indicated that many residents were housing cost burdened with 24% of owners and 47% of renters spending more than 30% of their income on housing (2014 ACS).

Through Avenue's community development work in Northline and its recent own affordable housing experience in Northline, it is clear that much of the community has a desire for improvements to both the existing stock of single family homes and new single family homes, but, with the exception of senior housing, a limited desire for new multi-family housing. Just over 5 years ago, before Avenue



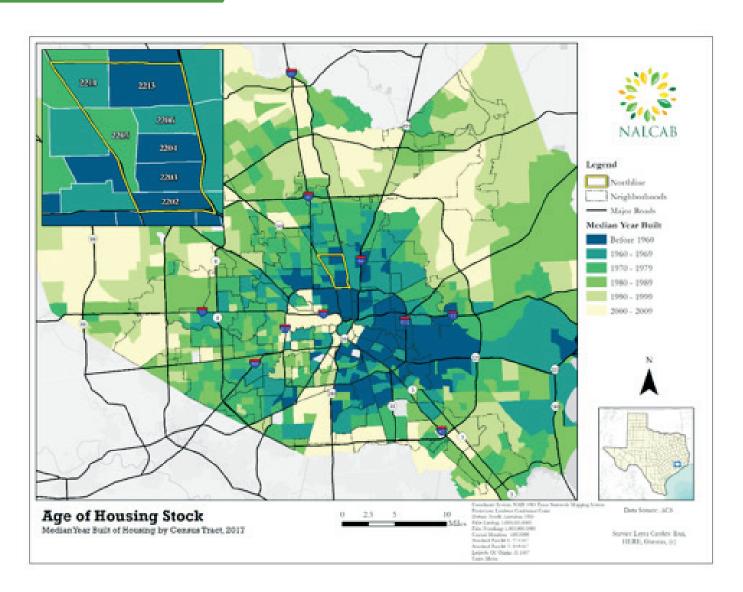
had started significant community development efforts in the neighborhood, it optioned a parcel of land in the center of Northline for a 9% low income housing tax credit project. While performing outreach to the community seeking needed public support, we encountered significant opposition to the project and ultimately canceled it. The message to us was clear – Avenue was welcome to improve the existing stock of multi-family housing but not to build more; the community liked its single family characteristic.

New Data Analyses

As part of this grant Avenue contracted with the Houston Community Data Connections center at the Rice University's Kinder Institute for Urban Research to perform various data analyses using current (up to 2018) data.

One analysis performed by HCDC was to look at 2018 HCAD data for median home values in the 7 study census tracts and compare that to 2013

Avenue was welcome to improve the existing stock of multi-family housing but not to build more; the community liked its single family characteristic.



HCAD data. The results shown in the following figures show that in real terms (inflation adjusted), homes appreciated from a high of 10% per year in tract 2202 to a low of 1% per year in tract 2214, with 4 of the 7 census tracts having increases of 4% or more per year.

In keeping with other observed trends there was also an apparent south to north gradient in this increase (census tract 2202 being the most southern, 2214 being one of the two most north). Such high real rates in home value increases would indicate that

property tax burdens likely increased for area residents and that for existing residents wishing to form new home-owning households by moving from rental properties or out of their existing family's home to homeownership the hurdle for homeownership would be higher. Conversely, the increase in home values indicates that for present home-owning residents their increased home value could be a source of equity to tap for home improvements.

HCDC also analyzed this current HCAD data for address mismatches between both 2013 and 2018.

Median Assessed Value 2013

Median Assessed Value 2018





Median Assessed Value, Change from 2013 to 2018

Census Tract	2013	2018	Yearly % Increase	
2202	72,929	108,562	9.77%	
2203	75,867	94,055	4.79%	
2204	66,395	89,001	6.81%	
2205	72,786	78,921	1.69%	
2206	77,810	99,100	5.47%	
2213	68,088	80,079	3.52%	
2214	74,780	77,855	0.82%	
Harris County	149,040	200,250	6.87%	

Source: HCAD and Texas A&M Real Estate Center

An address mismatch is a reliable proxy for home ownership, a mismatch indicating that the home is a possible rental property. Data from 2013 and from 2018 indicate there was no appreciable increase in address mismatches (2011 mismatches for 6968 parcels in 2013 versus 2120 of 6980 in 2018). This would indicate that between 2013 and 2018 there was not a significant change in homeownership rates.

Additionally HCDC looked at both homestead exemption data and HMDA data for Avenue. These will be explored in later portions of this report.



04 | Equitable Development Action Plan

Vision

The Northline community is a community of many characteristics but perhaps the one Avenue has heard over the years most strongly is that it is a community that aims to maintain its single family characteristics for those that live in the community. It is a proud, home-owning neighborhood. More than perhaps any other factor, this will inform Avenue's proposed action plan.

The community, in conjunction with Avenue, developed a vision for their neighborhood. The overall plan is composed of 10 subplans of which housing is one. Each subplan in turn has a community vision. The housing vision for the community is as follows:

The quality of our housing will be improved and our residents will have access to the resources they need to become homeowners, maintain their homes and secure quality housing.

This vision guides the action plan.

Action Plan Elements

The action plan has been structured to help achieve three overarching goals that should help achieve equitable neighborhood development:

Goal 1: Increase home ownership for Northline low and moderate income residents

- Strategy 1: Modular construction
- Strategy 2: Starter homes ready for expansion
- Strategy 3: Acquisition and rehabilitation
- Strategy 4: Accessory dwelling units
- Strategy 5: Community Land Trust

Goal 2: Stabilize existing low and moderate income homeowners so that they can remain in Northline

- Strategy 1: Home Repairs
- Strategy 2: Home Repair Loans
- Strategy 3: Accessing Tax Exemptions



Goal 3: Advocate for policies that could increase homeownership and/or help stabilize existing homeowners

- Strategy 1: Down payment assistance
- Strategy 2: Property taxes
- Strategy 3: Accelerator fund
- Strategy 4: City code changes

Goal 1: Increase Home Ownership

Modular Construction – Avenue is presently building new homes on site in Northline. Avenue Meadows 1 was completed in December of 2018 and the homes have now all been sold. The objective is to sell half to market buyers and half to buyers at less than 120% of AMI. These homes are priced between \$179,000 and \$182,000, much below Houston's January median sales price of \$222,000. Avenue is presently pricing phase 2 of this development and expects prices to increase to around \$200,000 per unit.

While largely successful relative to its objectives for the first phase, Avenue recognizes that given the median household income for Northline residents, they will be hard pressed to purchase these homes. In short, Avenue is helping to address Houston's overall affordable housing needs but perhaps not the affordable housing needs of the Northline community.

In an attempt to lower construction costs, Avenue is piloting modular home construction. Modular homes are not manufactured housing, but rather are equivalent to site-built homes built in a factory. The modular components are built in a factory to design specifications, delivered to the home site, assembled and then connected to local utilities. Construction is in a highly controlled environment (a factory). At scale, economies should be achievable such that production costs and production uncertainties (weather, labor) that bear on the cost can be reduced.

The goal of the pilot is to gain experience with the design and construction of a modular home and then to make it available to local officials and affordable housing developers to tour to learn from Avenue initiated the pilot project in June of 2019. A lot was acquired in Northline and Avenue is in the final stages of building a 3/2 modular home.

Avenue's experiences and to view the product. Based on the results of this pilot Avenue may deploy this mode of construction in Avenue Park, its new 53-unit subdivision in Northline.

Avenue initiated the pilot project in June of 2019. A lot was acquired in Northline and Avenue is in the final stages of building a 3/2 modular home (see photo above).

Starter Homes Ready For Expansion – Avenue is presently designing a 2-bedroom 1-bath house with StudioMET, its architect for Avenue Meadows, with the objective that it could be built at Avenue Meadows 3 or Avenue Park. The home is being designed with the expectation that it could be expanded to a 3/2 with the addition of a master suite.

The expectation is that the 2/1's lower initial home price would help families get into the home and then over time they could save additional money and build equity in their house such that they could later finance expansion. Like with much of its affordable housing concepts, Avenue will be reaching out to the community for further input on this option when plans from the architect become available, likely in summer of 2019.

Acquisition/Rehab – Avenue has traditionally been a builder of new homes. However, through its Northline work, we have heard from the community that they are proud of their community and that they would like it to retain the same look and feel as it presently has. One affordable housing strategy that Avenue is studying is participating in the market as a buyer of homes for sale and rehabilitating those homes and making them available at a modest markup such that existing community residents can afford them.

Avenue believes this could be a viable business model for itself in that Avenue would be the builder (through Avenue Development), the realtor (through Avenue Realty), and would be able to provide home buyer education and counseling thorough our home buyer education and counseling program. This last factor could allow Avenue to help homebuyers that are qualified access down payment assistance through the city of Houston and other programs it is aware of.

In the data section of this document it is seen that prices are accelerating well above inflation in several of the census tracts for this grant. This strategy will require quick deployment to get ahead of this



rapidly developing market and Avenue will need to monitor the market to see if its strategy is contributing or hopefully retarding price appreciation, if such an impact is discernable.

Accessory Dwelling Units – Accessory dwelling units (ADU's) are units of housing that are added to an existing parcel of residential housing. The typical model in Houston is the garage apartment. The development of such units would have two benefits. First, given that market rents in Northline are affordable, they would add to the stock for affordable rental units in the area. Second, they could provide an income source for the current homeowner that would add the ADU.

One challenge to this model is given the current low median income of existing residents financing the construction work could be difficult. However, we believe many long-term home owners have equity built up in their land and homes such that it could be tapped for financing. Educating homeowners in how this could be done would be a central feature of this effort.

Avenue believes this model maybe applicable in several subdivisions in Northline that have over-

sized lots. Avenue recently purchased a vacant lot in a subdivision of Northline that has lots that measure 50' x 195', more than ample room to accommodate an ADU. These subdivisions would be prime candidates for this strategy.

Community Land Trust – The city of Houston recently chartered a city-wide community land trust that could be a new model of ownership for Houston residents. As such, it could play a role in the development and redevelopment of Northline's single-family housing stock.

This strategy has two significant challenges. First will be sufficient subsidies to procure the land underlying the new or existing home. The logical source of this subsidy will be the city of Houston or its associated land bank or land trust.

Second will be educational. Educating potential land trust homeowners in the unique land trust model will be challenging. Homeownership without land ownership for any population is a challenging concept but for a low income, low educational attainment community for whom English is not their first language this presents added challenges.

The land trust model is just getting started in Houston. The initial strategy relative to this option will be to monitor its progress and acceptance.

Goal 2: Stabilize Current Home Owners

Home Repairs — Through its community engagement work Avenue has also heard a consistent desire from existing Northline residents with respect to helping to repair their own homes. Much of the housing stock in the Northline area was built between the 1950's and the 1970's and is reaching an age at which significant levels of deferred maintenance are becoming a challenge for many residents. Avenue has also noted this in its Harvey related work in this neighborhood and other similar neighborhoods.

As part of this strategy to help homeowners stay in their present homes, Avenue will evaluate maintaining its home repair program it initiated in the immediate aftermath of Hurricane Harvey. Avenue's Hurricane Harvey program has repaired over 200 housing units since October 2017. Avenue is exploring other options for funding the program once Harvey funding has been exhausted. This could allow Avenue to repair homes in the Northline area.

Two additional programs Avenue is actively exploring is CenterPoint Energy's Weaterization program and the Amy Young Accessibility Program out of the Texas Department of Housing and Community Affairs. Each would allow Avenue to repair homes of qualifying residents in the Northline area. If additional sources of funding could be found or raised, more comprehensive repair work encompassing weatherization and accessibility improvements could also be done.

Home Repair Loans – A complementary strategy to home repairs would be to offer home repair loans. This could benefit residents that don't meet the qualification requirements of either or both of the weatherization or accessibility programs.

To explore the potential market for home loans, Avenue asked HCDC to query both 2013 and 2017 Home Mortgage Disclosure Act (HMDA) data for the 7 study census tracts. HMDA data is one of the few data sources that would indicate how many conventional home improvement loans had been applied for and their approval rate. Interestingly, the HMDA data indicated there was a market for home improvement loans in the area with 58 applications for home loans in 2013 and 67 in 2017. Perhaps more interestingly, the data indicated a low approval rate, with only 12 approvals in 2013 and 30 for 2018, or 21% in 2013 and 45% in 2018.

In light of this data and through discussions with Avenue's community outreach staff, Avenue believes that for a home repair loan program to be successful in the area it will need to be a program specifically tailored to overcome the community's limits relative to a conventional home improvement loan program (immigration status, etc.) and the community's comfort level with what can be complex financing matter. In short, Avenue believes a simplified, low-threshold loan program might be most appropriate for the community.

This may necessitate crafting a program that does not rely upon a lien/deed of trust model but rather a personal loan model. Avenue recognizes the risks associated with such a program may be higher but it might be more accepting to the community. Avenue believes it is worth the effort and is willing to engage with the community to determine if this is a better

model. If not, Avenue may seek to work with one or two conventional lenders to engage with the community and help them access the credit to repair their homes.

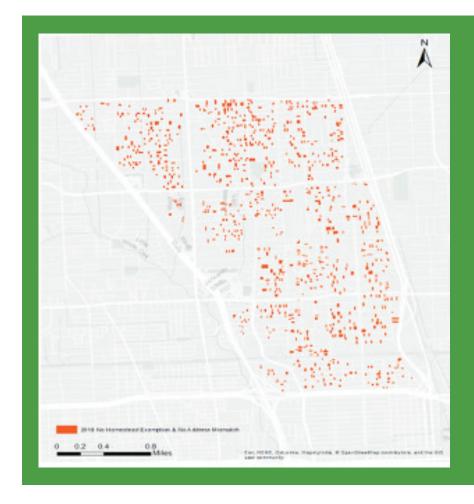
Accessing Tax Exemptions – Data obtained via our work with HCDC indicates that a number of residents in Northline may not be accessing exemptions they are entitled to that could help reduce their taxes owed and improve their overall housing stability. These exemptions include homestead exemptions, senior exemptions and disability exemptions.

Below, is a map produced by HCDC showing single family parcels in the study area that do not have an address mismatch (indicating likely occupied by owner) and do not have a homestead exemption. This will be the target population for outreach on taking advantage of available exemptions (Avenue has the associated address list).

Goal 3: Advocacy

Avenue has identified four policy initiatives that it will consider pursing to improve housing in the Northline neighborhood, each of which it believes will help provide more equitable development in Northline.

Down Payment Assistance – This is an area that Avenue believes it has already made progress in since the initiation of the grant. Avenue recognized that the City's down payment assistance program, which had not been updated in some time, was not sufficient to help buyers at less than 80% AMI and began actively lobbying the City to alter its program. Previously the program provided \$25,000 in assistance to buyers at 70% of AMI and below and \$15,000 in assistance to buyers between 71% and 80% of AMI. The City revised its program in 2018, increasing assistance to \$30,000 to all buyers



Potential Homes for Tax Exemption Outreach

Avenue will evaluate using this data to stage regular workshops in the Northline area where experts can assist residents determine if they are eligible for offered tax exemptions.

at 80% AMI and below. This will be a significant benefit to future low income buyers. Avenue and the community will continue to lobby for expansion and maintenance of this assistance.

Avenue also has partnerships with local banks that have their own down payment assistance programs to help buyers connect with these programs. Often these can be layered with the City's program, increasing the total overall amount of assistance. Avenue will continue to market these, including to buyers in the Northline community.

Property Taxes – As in much of Texas, Houston's property taxes have become an increasing burden to low and moderate income homeowners as property appraisals have increased. Avenue will research policy options to help ease this burden on low and moderate income homeowners that will benefit all communities in Houston including Northline.

Two promising options Avenue has identified for further research are Homestead Preservation Districts, a tool currently in Texas code but with certain defects and limitations that will likely have to be addressed legislatively, and Philadelphia's Long Term Owner Occupants Program ("LOOP Program"). Each might be means to reducing displacement of current Northline residents due to rapidly increasing property taxes.

Accelerator or Acquisition Fund – Among the challenges affordable housing developers face is the rising cost of properties, both undeveloped and developed, for acquisition and an increasingly competitive market landscape, where available properties enter the market and are quickly purchased. To combat this, San Francisco and other metro areas have created accelerator or acquisition funds that help non-profit developers quickly move on properties with short-term acquisition financing then are taken out when governmental support is lined up and closed.

Avenue learned of one such fund, the San Francisco Housing Accelerator Fund, at NALCAB's fall 2018 conference. Avenue intends to engage with local non-profits and foundations to see about the opportunity for creating such a fund in Houston.

City Code Opportunities – Avenue will also explore options to improve the City's development code around matters that impact affordable housing. Specific opportunities to influence City code around floodplain development, modular housing and manufactured housing currently exist. Avenue intends to engage with the larger non-profit housing community on these issues and others related to housing and to collectively weigh in on these issues to ensure that their impacts on affordable housing are considered.

Community Engagement

Avenue has been engaged in the Northline community for over 3 years and has developed and uses an extensive system of community engagement. The affordable housing staff participating in this grant benefits from that infrastructure. Via coordination with Avenue's community development team, housing staff have access to the Northline resident leadership and can participate in various events.

Avenue's housing staff have already tapped this resource twice to help it refine and receive community input on its housing strategies and projects. At a July meeting of Northline residents invited by Avenue's community development staff, housing staff received feedback on what potential homeowners' preferences are with various single family home design features. Avenue gained useful input from the community and used the input from this meeting to add gas service and eliminate garages and carports at its Avenue Meadows Phase 2 development.

Housing staff met again with the leadership team from Northline and specifically asked them to rank many of the strategies in this action plan. This information will help Avenue to improve these strategies and to prioritize how it will roll its program out.

Avenue intends to engage with the community throughout implementation of the action plan. One of the first opportunities will be to invite members of the community to its modular house that it is developing in Northline. Input from the community will be critical in making the decision to pursue this method of construction or not.



05 | Timeline, Budget Estimates and Metrics

To the right is a chart that details the timeline, budget, funding source and metrics for the strategies discussed. These are initial estimates and maybe adjusted as different strategies progress.

Avenue is presently implementing or is committed to implementing in 2019 the following strategies:

- Modular construction: pilot underway
- Acquisition/rehab: \$1 million in funding committed; program to commence second half 2019
- Home repairs: fall event scheduled and funding committed
- Tax exemption workshop: committed to one in 2019.

Many of the other strategies will require community outreach and feedback. Avenue will use its community engagement processes to solicit input from the community on the market, structure or interest in these. If feedback warrants Avenue will explore funding opportunities when required and staff commitments. When implemented appropriate metrics for each will be developed.



Implementation Plan

Strategy	Timeline Years 1-5	Budget High/Mod/Low	Funding Source Existing/New	Metrics
Modular Construction	Pilot Year 1, construct Years 2-3	High	Existing and New	If pilot successful, 25/year
Starter Homes	Outreach Year 1	High	Existing and New	Based on outreach results
Acquisition/Rehab	1-5	Mod	Existing and New	5/year
ADU's	Outreach Year 1	Mod	Existing and New	Based on outreach
CLT	Outreach Years 1 and 2	High	New	Based on outreach
Home Repairs	1-5	Mod	Existing and New	20/year
Home Repair Loans	Outreach and product development Years 1 and 2	Mod	Existing and New	Based on outreach
Tax Exemption Workshops	1-5	Low	Existing	1/year

