

COMMUNITY DEVELOPMENT AGENCY
HOUSING AND FEDERAL GRANTS DIVISION

January 10, 2023



Thomas K. Lai
DIRECTOR

Marin County Board of Supervisors
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SUBJECT: Federal HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) and Amendment to the 2021 Annual Action Plan for the HOME Investment Partnerships Program (HOME)

Dear Board Members,

Building and Safety
Environmental Health Services
Planning
Environmental Review
Housing
Sustainability
Code Enforcement
GIS
Federal Grants

www.marincounty.org/cda

RECOMMENDATIONS:

1. Hold a public hearing on January 10, 2023, for comment on:
 - A. The HOME-ARP Allocation Plan amending the 2021 Annual Action Plan, including proposed activity and budget changes to accommodate HOME-ARP funding allocated through the American Rescue Plan Act.

2. Following public testimony, approve:
 - A. The HOME-ARP Allocation Plan amending the 2021 Annual Action Plan and related documents, in substantially the form attached, and authorize any budget changes necessary to implement these actions.

 - B. Approve the Resolution authorizing staff to submit the HOME-ARP Allocation Plan and 2021 Annual Action Plan Amendment to the U.S. Department of Housing and Urban Development (HUD), and authorize staff to act in connection with these submissions and to provide such corrections, additional information, and non-substantial budget adjustments as HUD may require.

3. Inform the public that copies of the HOME-ARP Allocation Plan amending the 2021 Annual Action Plan, and related documents, records regarding past use of HOME funds, and local Policies and Procedures are available for inspection at the Community Development Agency.

SUMMARY:

In response to COVID-19, the U.S. Department of Housing and Urban Development (HUD) has received additional HOME Investment Partnerships Program funding (HOME-ARP) to appropriate to Participating Jurisdictions. These funds are made available through the American Rescue Plan Act. To accommodate the additional funding available through HOME-ARP, the County must complete an allocation plan and amend the 2021 Annual Action Plan approved by the Board of Supervisors on May 4, 2021.

DISCUSSION:

The American Rescue Plan Act, which was signed into law on March 11, 2021, appropriated \$5 billion to HUD's HOME Investment Partnerships Program (HOME-

#8

ARP). HOME-ARP funds are allocated by formula to jurisdictions that qualified for HOME Investment Partnerships Program allocations in Fiscal Year 2021 and are intended to provide housing, services, and shelter to individuals experiencing homelessness, those at risk of homelessness, and other vulnerable populations.

On September 13, 2021, HUD published its HOME-ARP program notice and issued the allocation plan template. The County of Marin has been allocated \$2,902,549. Grant funds are available for expenditure until the end of September 2030.

HOME-ARP funds must be used to primarily benefit individuals and families that meet the definition of one or more "qualifying populations":

- 1) Homeless
- 2) At Risk of Homelessness
- 3) Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
- 4) Other Populations where assistance would:
 - a. Prevent the family's homelessness; or
 - b. Serve those with the Greatest Risk of Housing Instability

HOME-ARP funds may be used for the following eligible activities:

- Affordable Rental Housing
- Tenant-Based Rental Assistance
- Supportive Services
- Non-Congregate Shelter

To receive HOME-ARP funds, the County is required to consult with local organizations serving the above qualifying populations, provide opportunities for public participation, and develop an allocation plan.

To support the development of a HOME-ARP allocation plan, during the month of September 2022, staff met with 16 nonprofit and government agencies representing the Continuum of Care; homeless, domestic violence, and veterans' service providers; the local Public Housing Authority; public agencies that address the needs of the qualifying populations; and agencies addressing fair housing, civil rights, and the needs of persons with disabilities. Through this outreach, staff learned about current and ongoing needs, groups facing significant challenges, and areas for potential investment. Staff utilized information acquired through this consultation and data collection process to draft the HOME-ARP Allocation Plan (Attachment 2), which consists of six sections:

1. Consultation
2. Public Participation
3. Needs Assessment and Gaps Analysis
4. HOME-ARP Activities
5. HOME-ARP Production Housing Goals
6. Preferences

On November 3, 2022, the Countywide Priority Setting Committee (PSC) held a public hearing to review findings from community consultations, receive community comments, and provide staff with direction to support further development of the

HOME-ARP Allocation Plan. On November 15, the County made the Draft HOME-ARP Allocation Plan available for public comment through December 16.

Consistent with findings from consultation interviews, data analysis, and direction from the PSC, staff recommend that the HOME-ARP funds be used to support, develop, and preserve affordable rental housing and make units more deeply affordable.

To do this, the Allocation Plan proposes granting HOME-ARP funds in conjunction with County Affordable Housing Funds (HTF) and Permanent Local Housing Allocation (PLHA) funds to leverage their collective impact with the goal of making 30 residential units more deeply affordable. For example, HTF and PLHA typically regulate rents at 60% of Area Median Income (AMI), whereas the addition of HOME-ARP funds would regulate rents for a specific subset of units at 30-50% AMI.

In addition, the Allocation Plan gives preference to families who are experiencing homelessness or at risk of homelessness, and families that are domestic violence survivors who are experiencing homelessness or at risk of homelessness.

On December 1, 2022, the PSC held a public hearing to receive feedback on the draft HOME-ARP Allocation Plan and approved a recommendation to submit the plan to the Board of Supervisors.

EQUITY IMPACT:

The HOME-ARP Allocation Plan prioritizes funding for projects that serve families who are experiencing homelessness or at risk of homelessness, and families that are domestic violence survivors who are experiencing homelessness or at risk of homelessness. People of color, especially African American and Indigenous people, experience homelessness at higher rates than White people, largely due to long-standing historical and structural racism.

All projects must Affirmatively Further Fair Housing¹, engage in Affirmative Marketing², serve low-income persons, and serve members of the protected classes as defined by HUD³.

FISCAL/STAFFING IMPACT:

The HOME-ARP Allocation Plan amending the 2021 Annual Action Plan has no impact on Net County Costs. Approval by your Board of this action would increase expenditures and revenues by \$2,902,549 for the HOME-ARP grant in Fund 2770, Program 5130 CDA Federal Grants.

Funding recommendations over \$50,000, consistent with the HOME-ARP Allocation Plan amending the 2021 Annual Action Plan and public hearing, will come before the Board of Supervisors for contract approval. All contract approvals for commitments of \$50,000 or less shall be delegated to the County Administrator, or their designee.

¹ Taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on the protected characteristics listed in Footnote 3.

² Methods of advertising and community outreach that are designed to reach persons who are least likely to know about or apply for the program, including marketing in formats that are accessible for persons with disabilities and in languages other than English.

³ Race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, and disability.

This is consistent with approval authority for Professional Services as described in the Countywide Procurement Manual, effective February 2018.

REVIEWED BY:

- | | |
|--|---|
| <input type="checkbox"/> Department of Finance | <input checked="" type="checkbox"/> N/A |
| <input type="checkbox"/> County Administrator's Office | <input checked="" type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> County Counsel | <input type="checkbox"/> N/A |
| <input type="checkbox"/> Human Resources | <input checked="" type="checkbox"/> N/A |

Respectfully submitted,


Molly Kren
Senior Planner


Leelee Thomas
Deputy Director

ATTACHMENTS:

1. Resolution approving the HOME-ARP Allocation Plan amending the 2021 Annual Action Plan.
2. Draft HOME-ARP Allocation Plan.

RESOLUTION NO. 2023-_____
RESOLUTION OF THE MARIN COUNTY BOARD OF SUPERVISORS
AUTHORIZING SUBMISSION OF THE HOME-ARP ALLOCATION PLAN AND 2021 ANNUAL
ACTION PLAN AMENDMENT FOR THE USE OF HOME INVESTMENT PARTNERSHIPS PROGRAM
FUNDS PROVIDED BY THE AMERICAN RESCUE PLAN ACT.

WHEREAS, the American Rescue Plan (ARP) Act became law on March 11, 2021 and appropriated \$5 billion to the United States Department of Housing and Urban Development (HUD) for the HOME Investment Partnerships Program (HOME) to serve individuals experiencing homelessness and other vulnerable populations in the wake of COVID-19 (HOME-ARP),

WHEREAS, the County of Marin was allocated \$2,902,549 in HOME-ARP funding; and

WHEREAS, the Board of Supervisors of the County of Marin, in cooperation with eleven cities in the County, has adopted a community development strategy establishing interjurisdictional citizen participation and planning for HOME; and

WHEREAS, the Countywide Priority Setting Committee, the countywide citizen participation body for HOME, conducted a public hearing on November 3, 2022 and December 1, 2022 to solicit public testimony on community consultation findings and the proposed use of HOME-ARP, and to make recommendations to be forwarded to the Board of Supervisors of the County of Marin; and

WHEREAS, a notice of availability of the draft HOME-ARP Allocation Plan amending the 2021 Annual Action Plan for use of HOME-ARP funds was published on November 13, 2022 in the *Marin Independent Journal*, a newspaper of general circulation; and

WHEREAS, the Board of Supervisors of the County of Marin conducted a public hearing on January 10, 2023, to hear public testimony and consider in full the draft HOME-ARP Allocation Plan amending the 2021 Annual Allocation Plan and associated documents; and

WHEREAS, the Board of Supervisors of the County of Marin has certified that the HOME-ARP Allocation Plan has been developed with citizen input and gives maximum feasible priority to activities that will principally benefit HOME-ARP Qualifying Populations.

NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors of the County of Marin hereby authorizes County staff to sign and submit the HOME-ARP Allocation Plan amending the 2021 Annual Action Plan, including the required Certifications and associated documents to HUD, and authorizes staff to act in connection with the submission of the Annual Action Plan Amendment and to provide such corrections, additional information, and non-substantial budget adjustments as HUD may require.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Marin held on this 10th day of January, 2023, by the following vote:

AYES: SUPERVISORS

NOES:

ABSENT:

PRESIDENT, BOARD OF SUPERVISORS

ATTEST:

DEPUTY CLERK

County of Marin

Draft HOME-ARP Allocation Plan for Public Review

First Substantial Amendment to the 2021 Annual Action Plan Amendment



Prepared by
Marin County Community Development Agency
Housing & Federal Grants Division

Posted November 15, 2022
Updated November 22, 2022

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Participating Jurisdiction: County of Marin

Date: November 15, 2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum.

Describe the consultation process including methods used and dates of consultation:

The Marin County Community Development Agency's Housing and Federal Grants Division (CDA) conducts ongoing stakeholder engagement and consultation to help guide its funding programs to ensure they are responding to the needs of the community. Stakeholder engagement includes outreach to nonprofit agencies, local government jurisdictions, Continuum of Care (CoC) providers, housing developers, the local public housing agency, and other County departments.

Consultation for HOME-ARP included 18 individual meetings with representatives from 16 different organizations and government agencies serving the qualifying populations and Fair Housing experts, as identified by HOME-ARP. Consultation meetings took place between September 12, 2022 and September 23, 2022.

List of organizations consulted:

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|-----------------------|---|------------------------|---|
| Adopt A Family | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none">• More affordable housing for families.• Additional emergency and transitional housing options for families, in particular for families with multiple children.• Housing, vouchers, and support services for undocumented or non-chronically homeless families.• Support services to address food security, find housing, childcare, credit repair, mental health and isolation, addiction, etc.• Financial support to address cost of rent, childcare.• More rental assistance to address back rent from COVID-19 and keep people housed. |

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|----------------------------------|--|------------------------|--|
| Bucklew Programs | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • Additional affordable housing and transitional housing needed for households managing mental health and substance health challenges, particularly families and young people. • Vouchers to transition to housing permanently. • Non-Congregate Shelter options for people with mental health challenges. |
| Center for Domestic Peace | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • Permanent affordable and transitional housing to leave dangerous situations. • Jobs with wages sufficient to pay full rent/back rent. • Support services to address food security, find housing, childcare, credit repair, mental health and isolation, addiction, etc. • Financial support to address cost of rent, childcare, funeral expenses, predatory loans, and debt. • Legal services. • Better language support to access public benefits and community-based services. • Housing, rental assistance, and services for undocumented households. |
| City of San Rafael | Public Agency Addressing the Needs of Qualifying Populations | Meeting | <ul style="list-style-type: none"> • Prioritize more affordable housing units with 2 and 3 bedrooms specifically for families. • More vouchers paired with supportive services. |
| Community Action Marin | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • More rental assistance to address back rent from COVID-19 and keep people housed. • More affordable housing, especially for families and older adults. • Supportive services including workforce/career training. • More vouchers. |
| Downtown Streets Team | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • More affordable housing. • Support services to help formerly homeless maintain housing. |

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|--|---|------------------------|--|
| | | | <ul style="list-style-type: none"> • More support services for currently homeless and those not eligible for vouchers. |
| Fair Housing Advocates of Northern California | Public Organization Addressing Fair Housing and Civil Rights | Meeting | <ul style="list-style-type: none"> • Supportive services for people with vouchers, including housing navigators and landlord liaison. • More affordable housing. • More Fair Housing education and enforcement tools to compel compliance by landlords and developers around source of income, race discrimination, and local preference. • Affordable housing for extremely low-income and no-income households. • More vouchers. • Deposit assistance and rent assistance for households unable to access vouchers. |
| Homeward Bound of Marin | Homeless and Domestic Violence Service Provider/ Veterans' Service Provider | Meeting | <ul style="list-style-type: none"> • More capital funds for affordable housing development. • Affordable housing for extremely low-income and no-income households. • More housing-based case management paired with vouchers for families. |
| Marin Center for Independent Living | Public Organization Addressing the Needs of Persons with Disabilities | Meeting/Email | <ul style="list-style-type: none"> • More affordable housing for people with disabilities and their caregivers. • Rental assistance to maintain housing for people with disabilities. • More vouchers with set-aside specifically for people with disabilities. • More affordable long-term care housing for people unable to live independently. • Better language support to improve access to housing and services. • Support services for case management, housing navigation, and to alleviate added financial burden for people with disabilities. • Overall, better integration and access to housing-related resources and services for people with disabilities. |

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|--|--|------------------------|---|
| Marin County Health and Human Services | Veterans' Service Provider | Meeting | <ul style="list-style-type: none"> • More housing overall. • Affordable housing for elderly fixed-income veterans who are being priced out of the market. • Temporary vouchers/financial assistance while VASH vouchers are on hold. • Support services for credit and eviction history repair. |
| Marin County Health and Human Services | Public Agency Addressing the Needs of Qualifying Populations | Meeting | <ul style="list-style-type: none"> • Time-limited vouchers for households on the path to a permanent voucher. • More funding for supportive services whose funding streams end in 2025. |
| Marin County Homelessness and Whole Person Care | Continuum of Care (CoC) | Meeting | <ul style="list-style-type: none"> • Affordable housing available to extremely low-income and no-income households. • Vouchers to house rising number of homeless families, especially single-parent households. • Vouchers to support seniors on fixed incomes with dwindling savings. • Case management for permanent supportive housing. |
| Marin Housing Authority | Public Housing Agency (PHA) | Meeting | <ul style="list-style-type: none"> • More affordable housing. • Support services such as housing liaison to keep people with vouchers housed and navigate landlord issues. • Vouchers to address Mainstream Voucher shortfall. |
| Ritter Center | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • More affordable housing dedicated to the Housing First approach. • Case management to keep formerly homeless housed. • More rental assistance and rapid re-housing resources. • Universal Basic Income for seniors and families. |
| Side By Side | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • Permanent affordable and transitional housing. • Emergency shelter for minors. • Non-Congregate Shelter options for transitional age youth (TAY) women. |

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|---|---|------------------------|---|
| | | | <ul style="list-style-type: none"> • Vouchers to support TAY on Supplemental Security Income. |
| St. Vincent de Paul Society of Marin | Homeless and Domestic Violence Service Provider | Meeting | <ul style="list-style-type: none"> • More capital for affordable housing. • Vouchers for seniors with shorter period of ongoing need. • More Non-Congregate Shelter with supportive services for clients on path to be permanently housed. |

Summarize feedback received and results of upfront consultation with these entities:

Through stakeholder engagement and consultation efforts, CDA learned about current and ongoing needs, groups facing significant challenges, and areas for potential investment. Consultations highlighted the significantly growing trend of family homelessness and the lack of investments in permanent affordable housing for this population. Also identified was the need for more housing assistance for domestic violence survivors. Across all populations, the need far outweighs the resources. Through the interviews, CDA identified that the Coordinated Entry system works well for specific populations, but its design is far too narrow to facilitate housing access for many populations, including those identified as Qualifying Populations to be served by HOME-ARP. Below are the results of these outreach and consultation efforts:

Populations at risk of homelessness and/or facing ongoing impacts from COVID-19 in Marin County:

- Domestic violence survivors
- Families*
- Immigrant, monolingual Spanish-speaking, and undocumented households*
- People with dementia and traumatic brain injuries
- People with disabilities
- People exiting the justice system
- People with mental health and/or substance use issues
- Seniors*
- Transitional Age Youth

(*Most frequently referenced populations)

Trends impacting homelessness in Marin County:

- There has been a dramatic increase in family homelessness across Marin County. Families are finding themselves living in vehicles and precariously housed at rates not previously seen.
- The county’s immigrant, monolingual Spanish-speaking, and undocumented community has largely been left behind and precluded from accessing meaningful levels of COVID relief. Many in this community hold subleases. Some tenants felt threatened by landlords

and/or were pressured to take out predatory loans to pay rent during deep COVID. Both subleases and loans were precluded from the Emergency Rental Assistance Program.

- While COVID relief resources have generated many new housing vouchers, many low-income people at risk of homelessness or precariously housed households are ineligible for existing vouchers because they are undocumented and/or are not chronically homeless.
- The County and region are experiencing untenable rent increases impacting all populations.
- Naturally Occurring Affordable Housing (NOAH) has rapidly disappeared throughout the pandemic, as long-held income properties have sold and changed hands.
- There is an increasing number of seniors with income streams and savings coming to an end who will be unable to keep up with rapidly rising rents.
- The number of emergency beds and vouchers for domestic violence survivors is insufficient. Many survivors have stayed in unsafe households throughout the pandemic. Domestic violence increased during the pandemic and remains a large issue.
- The Coordinated Entry system used to prioritize housing vouchers has significant gaps in reaching and serving families, people with disabilities, Transitional Age Youth, folks with dementia and traumatic brain injuries, and people coming out of the justice system.
- Some landlords are using illegal income requirements and engaging in racial profiling of potential new leaseholders.
- The Marin Housing Authority is in a funding shortfall with HUD and is unable to issue new Housing Choice Vouchers (HCV) until additional resources are made available by HUD.
- The Veteran's Administration is not currently issuing Veterans Affairs Supportive Housing vouchers (VASH). The VASH program combines HUD's Housing Choice Voucher (HCV) rental assistance for homeless veterans with case management and supportive services.

Needs to reduce and prevent homelessness in Marin County:

- Additional affordable housing units.
- Case management and housing liaisons to keep people in housing.
- Housing navigators to assist mainstream voucher holders with finding units.
- Additional housing vouchers and rental assistance.
- Additional Rapid Re-housing¹ funds to get households back into housing quickly before they become chronically homeless.
- Family transitional housing, shelter beds, and trauma-informed care.
- Universal Basic Income support.
- Deposit assistance.
- Supportive services, including but not limited to access to food, utilities payments, childcare, and employment services.
- Legal services for eviction prevention, domestic violence, unpaid wages, etc.

¹ Rapid re-housing provides short-term rental assistance and services. The goals are to help people obtain housing quickly, increase self-sufficiency, and stay housed.

Potential funding opportunities:

- Acquisition and/or development of affordable rental housing.
- Buy down affordability in existing pipeline of affordable housing projects.
- Time-limited vouchers paired with case management.
- Supportive services addressing the supportive housing fiscal cliff.
- Acquisition and/or development of non-congregant shelter.

Additional considerations and findings:

- Bulk of COVID relief dollars received have gone to vouchers and support services.
- All substantial new affordable housing developments in the last four years have been for seniors and homeless individuals, not available to families.
- Housing-based case management needs to be funded for 5 years and should be paired with vouchers to be effective.
- The County's supportive housing programs have time limited funding for a period of three years. The County is looking for new funding streams to avoid a fiscal cliff in three years, when program funding ceases.
- The Downtown Streets Team shower program has been cut, leaving people experiencing homelessness without access to showers.
- Sober living housing, shelters, and transitional housing often have a 6-month limit, which creates a revolving door.
- Many people experiencing homelessness do not feel comfortable or safe in congregate shelter environments.
- Landlords are not sad to see the tenants go and are able to raise rents significantly after evictions.
- Staffing is increasingly hard for service providers due to cost of living in the area.
- New housing designs should consider intergenerational housing and universal design.

Existing Resources:

Over the past three years the County has received over \$80 million in COVID and non-COVID related resources to support homeless services and prevent homelessness through state, federal, local, and private funds. The bulk of these funds have been allocated for supportive services, vouchers, and emergency rental assistance. Of this total, \$20 million has been allocated to support the acquisition and construction of a new homeless shelter and permanent supportive housing project, and three Homekey projects, all of which are limited to serving homeless adults.

Public Participation

A PJ must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less

than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- **Date(s) of public notice:** November 13, 2022, September 30, 2022, and August 2, 2021
- **Public comment period:** Start date - 11/15/2022 End date - 12/16/2022
- **Date(s) of public hearing:** January 10, 2023; December 1, 2022; November 3, 2022; and November 4, 2021

Describe the public participation process:

CDA strives to conduct public engagement in ways that will provide a number of opportunities for participation and consultation. The first aspect of our public engagement approach is public noticing. CDA publishes notices in the local newspaper that serves the entire county. All public notices are translated into Spanish and Vietnamese and posted to the County’s Federal Grants webpage. The second component is community outreach. To support community outreach, CDA maintains a list of over 1,200 stakeholders, nonprofit agencies, local government officials, community members, and developers. Communications on funding program updates, public hearings, and public comment periods are regularly distributed to this list. Finally, CDA conducts public hearings. For the approval of a plan or amendment impacting HOME, two hearings are required. First, the Countywide Priority Setting Committee (PSC) hearing educates the public on the range of activities allowed through HOME-ARP, solicits public comment, and establishes a recommendation for the Board of Supervisors (BOS). Subsequently, the Board of Supervisors conducts a hearing at their regularly scheduled meeting to again educate the public on the range of activities allowed through HOME-ARP, receive public comments, and approve the plan and/or amendment. All public comments are recorded and included with the submission of this plan. Public hearing staff reports are translated into Spanish and Vietnamese and posted to the Federal Grants webpage. In addition, oral interpretation and Communication Access Realtime Translation (CART) services are available upon request for PSC hearings. The BOS hearings provide Spanish translation and CART services, with other languages available upon request.

Describe efforts to broaden public participation:

To broaden public participation, CDA extended the period of plan review and public comment from the required 15 days to 32 days. The plan was posted on the website with instant translation available through Google Translate. In addition, CDA issued three public notices and held four public hearings to educate the public about HOME-ARP and receive public input. These public hearings included an overview of the HOME-ARP program’s range of allowable activities,

opportunities to provide input, key data points regarding housing and homeless needs in Marin, and County use of resources to support housing and homelessness throughout the pandemic.

CDA distributed three electronic communications with information about HOME-ARP, opportunities to consult, and the notice of public comment period through its community listserv, reaching over 1,200 recipients.

The public hearings were held virtually to ensure as many people as possible could participate without barriers of travel and public health concerns. Notice of the meetings was provided in English, Spanish, and Vietnamese. Interpreters were offered and Spanish translation was provided at two hearings. Participants were provided CDA contact information and were encouraged to contact staff outside of the meeting to provide comments or questions.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Comments and questions from the 12/1/2022 hearing:

- Thank staff for incorporating requested changes from the 11/3/2022 hearing.
- How much total funding will HOME-ARP leverage? How much HOME-ARP per unit?
- Explain how much funding per unit is needed to buy down affordability for fifty-five years?
- Is the concept that that we make two or three units in a development more affordable and spread it over a few projects? That makes sense to me to spread the funding across multiple projects across the County.
- 10 to 15 units is too few units for our goal to house extremely low-income.
- We know the Area Median Income is high, but what does it really mean when it comes to affordable rents? Can people who work at Walgreens, CVS, restaurants, retail, or grocery stores afford rents a 40, 50, 60% AMI?
- How are we supporting the extremely low-income people afford rents outside of vouchers?
- There are not enough HUD approved properties to house all of the people in Marin who are homeless, on strict incomes, seniors, and the working poor.
- Using vouchers to offset the inflation of housing costs is not enough. We have so many people that are under the poverty line competing for services and housing that do not exist.
- Will these funds be going to for-profit developers/developments?
- What would it look like if we tried to buy down affordability to 0-30% AMI?
- If we do a 20-year time period for affordability could increase the number of units?
- Can this housing providers collaborate with other CBOs so that they can better care for residents?
- Change the affordability to 20 years, and increase the number of units.

Comments and questions from the 11/3/2022 hearing:

- Why is rental assistance not a priority use? Towns are facing pressure to pass rent stabilization to prevent displacement. Can this be used in-lieu of those new policies?
- Can ADUs be considered for funding through HOME-ARP?
- Families have been disparately impacted in Marin for a long time. It is an ongoing area of housing need that is really difficult to make an impact. I am supportive of focusing on families. We should only focus these funds on people experiencing homelessness or at risk of homelessness and include families experiencing domestic violence.
- We should include preserving existing housing for families. Can we award funds to affordable housing groups to subsidize their purchase of market rate housing to preserve as affordable?
- I am concerned that this money will only go to one project. I want to spread it around Marin to support families who are experiencing homelessness or at risk of homelessness and victims of domestic violence.
- Can we reduce the requirements and restrictions on the funds and focus on projects ineligible in other funding cycles? Can we fund longer term projects?
- We need to look at how we diversify funding across the county.
- I don't think we can make a dent in an affordable housing project with such little funding. I think we can have a bigger impact with affordability buy down. It is a little amount of money; we should pick one thing and focus our resources.
- Is there other funding for safe houses for domestic violence victims? When there is a domestic violence incident, are there translation services to assist people with getting help?
- Safe house services are extremely limited and not enough. I was only allowed to stay for 5 days and had nowhere to go. There is a long waitlist for more permanent transitional shelter. It's not enough.
- There is considerable need for capital funding for the HUD Parcel, which is 50 units of veteran and workforce housing.
- Transitional Age Youth (TAY) families have a big gap in services and housing.

Summarize any comments or recommendations not accepted and state the reasons why:

All comments and recommendations were accepted.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Homeless Needs Inventory and Gap Analysis Table

| Homeless | | | | | | | | | | | | | |
|------------------------------|--------------------------|------------|-------------|------------|-----------|------------------------------|----------------------|------|---------------|---------------------|------------|-------------|------------|
| | Current Inventory | | | | | Homeless Population | | | | Gap Analysis | | | |
| | Family | | Adults Only | | Vets | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV | Family | | Adults Only | |
| | # of Beds | # of Units | # of Beds | # of Units | # of Beds | | | | | # of Beds | # of Units | # of Beds | # of Units |
| Emergency Shelter | 45 | 19 | 110 | 110 | 0 | | | | | | | | |
| Transitional Housing | 97 | 44 | 40 | 40 | 12 | | | | | | | | |
| Permanent Supportive Housing | 174 | 57 | 506 | 496 | 72 | | | | | | | | |
| Other Permanent Housing | 120 | 45 | 104 | 97 | 0 | | | | | | | | |
| Sheltered Homeless | | | | | | 133 | 158 | 14 | 81 | | | | |
| Unsheltered Homeless | | | | | | 91 | 737 | 51 | 28 | | | | |
| Current Gap | | | | | | | | | | 91 | 28 | 737 | 582 |

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Needs Inventory and Gap Analysis Table

| Non-Homeless | | | |
|---|--------------------------|----------------------|---------------------|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of Units | # of Households | # of Households |
| Total Rental Units | 38,317 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 4,065 | | |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 4,505 | | |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 8,170 | |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 5,775 | |
| Current Gaps | | | 5,375 |

Data Sources: 2019 American Community Survey 5-year estimates, Table B25003; 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

Homeless as defined in 24 CFR 91.5

The total number of individuals experiencing homelessness in Marin County has increased by 8.4% from the 2019 Point in Time Count (PIT). While the number of homeless has not changed substantially, the demographics of who are homeless are shifting. Family homelessness has grown by over 35%, which is unprecedented in Marin. The PIT showed 1,121 people experiencing homelessness in Marin County with 26% of those sheltered and 74% unsheltered. With regard to age, 8% were under 18, 15% 18-24, 50% 25-59, and 28% 60 and older. 59% were male, 39% female, and 2% were transgender or gender non-conforming. 65% were white, 22% black, 4% American Indian or Alaska Native, and 5% multi-racial or other. 23% were Hispanic/Latinx. Since the PIT count was completed, current data indicates that the number of homeless is continuing to grow and has increased to over 1,400 homeless individuals since January 2022.

At Risk of Homelessness as defined in 24 CFR 91.5

The demographics of households at risk of homelessness include low-income individuals and families with children (especially extremely low-income) who are currently housed but severely rent burdened, currently residing in shelters, and/or formerly homeless families and individuals who are receiving rapid re-housing assistance.

Marin County’s 2020-24 Consolidated Plan discusses the demographics of households with severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables below show the number of Marin County households that have severe housing needs by income, race, and ethnicity. Needs are defined as one or more of the following housing problems: 1) Housing lacks complete kitchen facilities, 2) Housing lacks complete plumbing facilities, 3) Household has more than 1.5 persons per room, 4) Household cost burden exceeds 50 percent.

0%-30% of Area Median Income

| Severe Housing Problems | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|---|--|---|
| Jurisdiction as a whole | 10,967 | 4,295 | 877 |
| White | 7,243 | 3,075 | 628 |
| Black / African American | 319 | 170 | 24 |
| Asian | 459 | 225 | 58 |
| American Indian, Alaska Native | 100 | 15 | 4 |
| Pacific Islander | 34 | 0 | 0 |
| Hispanic | 2,596 | 538 | 95 |

Data Source: 2011-2015 CHAS

30%-50% of Area Median Income

| Severe Housing Problems | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|--|---------------------------------------|--|
| Jurisdiction as a whole | 6,082 | 6,312 | 0 |
| White | 4,266 | 4,781 | 0 |
| Black / African American | 119 | 90 | 0 |
| Asian | 234 | 388 | 0 |
| American Indian, Alaska Native | 4 | 10 | 0 |
| Pacific Islander | 0 | 0 | 0 |
| Hispanic | 1,380 | 928 | 0 |

Data Source: 2011-2015 CHAS

The most recent HUD Comprehensive Housing Affordability Strategy (CHAS) data identifies that 9,085 (or 26%) of Marin renter households are severely rent-burdened and are considered an at-risk population². Severely rent-burdened households are defined as spending more than half of monthly income on rent. An additional 8,745 (or 22.8%) renter households are rent burdened, paying more than 30% of their income, but less than 50%.

In addition, the County’s 2023 Draft Housing Element estimates 1,274 agricultural workers living in West Marin, the majority of whom are not seasonal workers. According to the Community Land Trust Association of West Marin (CLAM), a farm worker in Marin is likely to earn an annual salary of no more than \$28,000.

There are significant race-based income disparities in Marin County that directly impact housing access and financial burden. In 2018, non-Hispanic White residents in Marin earned a median annual income of \$121,310³, while Black/African American and Hispanic/Latinx residents earned roughly half that amount, at \$66,316 and \$64,367 respectively. With a median contract rent of about \$2,072 per month in 2018⁴, non-Hispanic White residents spend about 20% of their monthly income on rent, in comparison to 38% and 39% for Black/African American and Hispanic/Latinx residents, respectively.

There are 200 active applicants on the Housing Choice Voucher/Section 8 waitlist. The Marin Housing Authority's Housing Choice Voucher/Section 8 waitlist opened in September 2008 and received 11,200 applications. Additionally, Marin Housing Authority has 822 applicants on their combined Public Housing waiting list. The Family Public Housing waitlist last opened in 2021 and had 700 applicants. The senior and disabled properties waitlist last opened in 2015 and currently has 213 active applicants.

Due to historic and ongoing discriminatory practices and government policies, members of protected classes, specifically people of color and those with disabilities, are more affected by the most common housing problems in Marin County, which include cost, availability, and

² CHAS Data 2020

³ 2013-2018 American Community Survey 5-year estimates, Table S1903

⁴ 2013-2018 American Community Survey 5-year estimates, Table B25058

quality. In addition, these individuals are less likely to have housing access in areas of opportunity in the County.

Individuals and families receiving rapid re-housing that are nearing the end of their assistance often have an ongoing need for increased income, education/vocational training that could lead to higher paying employment, affordable childcare, and ongoing budgeting and money management support. Linkages to community resources are especially important as the end of assistance approaches in order to ensure that households are able to access the supports they need to be self-sustaining in the future.

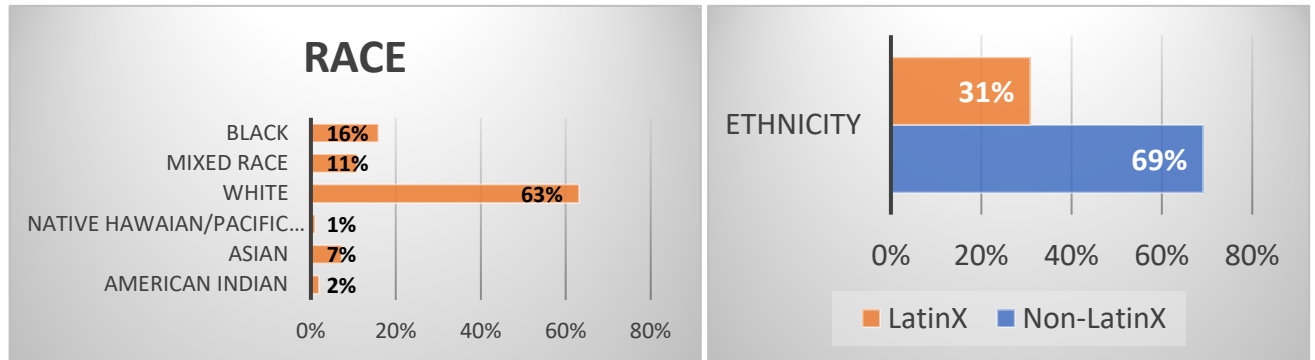
Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

In the 2022 PIT, 109 people fleeing domestic violence (DV) were counted. 81 were sheltered and 28 were unsheltered. Five percent (5%) of survey respondents reported they were currently experiencing domestic violence or partner abuse. Of those individuals, 54% were women, 39% were men, and 8% were transgender. Including those who are not currently homeless and were not counted in the PIT, based on DV service provider records, there are 373 survivors in Marin who need services. Demographics of the DV survivor population include: 1) Age - 62% were under 18, 9% were 18-24, and 29% were adults over age 24; 2) Ethnicity - 78% were Hispanic/Latino, 9% were African American, 10% were Caucasian, and 4% were other.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

From April 2020 through September 2022, the County of Marin has distributed approximately \$27 million in rental assistance to over 1,900 renter households and \$4.3 million in rapid rehousing support to over 700 households to prevent homelessness and providing stability to low-income households in Marin. Although these substantial resources have been distributed, these households remain at high-risk of future homelessness due to increasing rents, stagnant wages, and continuing debts resulting from the COVID-19 pandemic.

In addition, there are hundreds of low-income renter households in Marin who were ineligible for rental assistance because of program design which did not provide aid to people who were subtenants or renters who borrowed money to pay rent, often from predatory lenders. These two program designs negatively impacted the immigrant and Latino communities in Marin. The demographics of rental assistance recipients include:



In addition, 69% of rental assistance recipients have income below 30% AMI and 59% of recipients are Female headed households.

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. Female-headed households fall into one of three primary groups in Marin County: single professional women, single parents, and seniors. The last two groups in particular may have a need for affordable housing. The needs of female-headed households with children are particularly acute. The 2023-31 Housing Element identifies that female-headed households with children may face particular housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging.

Another population at greatest risk of housing instability are people living with disabilities. People living with disabilities require a wide range of housing supports. Special consideration should be given to income and affordability, as many people with disabilities are living on fixed incomes. The 2022 Supplemental Security Income (SSI) rate for Marin County is \$841 for an individual and \$1,261 for a couple. According to the 2020-24 Consolidated Plan, the Marin Center for Independent Living (MCIL) estimates that there are approximately 46,029 people living with disabilities in the county. One quarter of people with disabilities in Marin live in poverty. In addition, 38% of individuals with disabilities are homeless or housing insecure. In 2020 MCIL served 683 people with all types of disabilities (including older adults); of these, over 60% were facing a lack of affordable accessible housing. Approximately 75% of their clients live under the poverty level.

Unaccompanied children (under 18) and Transitional Age Youth (18-24), particularly those aging out of the foster care system and those with serious emotional disturbance or emerging

mental illness are at great risk of housing instability. The 2022 PIT Count identified two unaccompanied children (under 18 years old) and 124 unaccompanied transition-age youth (age 18-24) enumerated, accounting for 11% of the population experiencing homelessness in Marin County. Down slightly from years past, 5% of children and transition-age youth experiencing homelessness were sheltered, with 95% unsheltered. Unaccompanied children and transition-age youth have a 73% identifying as White, The Black or African American unaccompanied children and transition-age youth are overrepresented from the total homeless population with 23% compared to only 2% of the general Marin County population. The number of youth identifying as Hispanic or Latinx is 22% in 2022.

Many U.S. veterans experience conditions that place them at increased risk for homelessness. Veterans experience higher rates of post-traumatic stress disorder (PTSD), traumatic brain injury (TBI), sexual assault, and substance use disorders. Veterans experiencing homelessness are more likely to live on the street than in shelters, and often remain on the street for extended periods of time. The 2022 PIT Count identified 65 homeless veterans in Marin County, 51 of which were unsheltered. Four-fifths (80%) of veterans were cisgender male, 15% cisgender female, and 5% transgender. Black and Multi-race veterans were overrepresented when compared to the general population of Marin County, with 23% Black veterans compared to 2% of the general population, and 15% of Multi-race veterans compared to 11% of the general population.

*Describe the unmet housing and service needs of qualifying populations:
Homeless as defined in 24 CFR 91.5*

There are 1,121 people experiencing homelessness in Marin based on the 2022 PIT Count. Of those, 284 are chronically homeless and would likely require Permanent Supportive Housing. Marin also maintains a by-name list of people experiencing homelessness. Based on the by-name list, approximately 625 people qualify for permanent supportive housing, though some would likely be okay without supportive services. Due to the high housing costs in Marin and the greater Bay Area, most of the remaining people experiencing homelessness will need deed-restricted affordable housing or some type of housing subsidy. 830 people did not have access to shelter or transitional housing. In addition, 33% of PIT survey respondents reported not receiving any government assistance, 59% did not receive free meals, 76% did not receive day services, 77% did not receive health services, and 79% did not receive bus passes.

At Risk of Homelessness as defined in 24 CFR 91.5

As noted previously, the County has 13,945 households with incomes of 50% AMI or less that have at least 1 severe housing problem. Housing problems include: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. When looking at cost burden alone 17,830 households are rent burdened and with 9,085 of those being severely rent burdened.

Through the 2023-31 Housing Element process Marin County jurisdictions are required to plan for 4,171 units of housing for very low-income households and 2,400 units of housing for low-income households. This results in a minimum gap of 11,259 affordable units. However this number is likely much higher given the units being planned for if built would be deed restricted at levels higher than 50% AMI.

To truly meet the housing affordability needs of extremely low- and very low-income households in Marin, additional mainstream and project-based vouchers are needed from HUD. Time limited Tenant Based Rental Assistance is not adequate to address the ongoing affordability gap of housing in Marin.

The County has limited sources to fund the affordable housing needs. Since 2019 \$11 million of County general funds have been committed to address affordable housing needs. To increase production significantly more resources will be required. In addition, projects and program assisting helping qualifying population at risk of homelessness require ongoing operating funds.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Based on Domestic Violence provider service records, there are 373 survivors in Marin who need services, and 148 are receiving services, for a gap of 225 people. The services that domestic violence victims most need are: 1) permanent housing, and 2) representation by an attorney for DV legal cases.

Helping survivors find permanent, affordable housing has been the biggest challenge for years. Rent costs in Marin remain beyond reach for many survivors, and DV victims' loss of income due to COVID has made it harder for many victims to afford rent. Although the Center for Domestic Peace provides legal advocacy for survivors within the civil and criminal justice systems, they do not have attorneys on staff that can provide representation. Victims are unable to receive representation around custody, child support, divorce, etc., creating a gap around these types of cases for DV victims.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Based on the number of unsheltered homeless Transitional Age Youth and Veterans there is a need for at least 190 units with fund to support operations of such housing. The broader pool of populations requiring services and housing assistance to prevent homelessness is reflected in the description of unmet housing and service needs of populations at risk of homelessness.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

While Marin continues to focus on permanent housing, severe gaps remain. Over the past three years, the County has invested \$20 million to build 140 new units of permanent supportive housing (PSH), available for individuals only. In addition, it has created housing-based case management paired with vouchers to create an additional 200 beds of PSH for individuals and families. However, there is still a significant need for additional affordable housing, permanent supportive housing (particularly for the highest-need clients), and for those who need a higher level of care such as skilled nursing or dementia care. Marin's shelter inventory is also insufficient for the number of people experiencing homelessness, with only 26% of the homeless population being sheltered at the 2022 PIT count.

Over the past four years, all significant new affordable housing developments have been deed-restricted for seniors and individuals. There have been no new significant family housing developments in four years.

Identify characteristics associated with instability and increased risk of homelessness:

In Marin County the characteristics most associated with instability and increased risk of homelessness are high cost of rental housing, low stock of available rental housing, and abundance of low-wage service jobs. According to the 2023-31 Housing Element, the median rent for a one-bedroom apartment was \$2,450 while the median rent for two-bedrooms was \$3,151. The vacancy rate for rental units is a staggeringly low 2.5%. As reported in the Needs Assessment portion of this plan 26% of Marin renter households are severely rent-burdened.

Identify priority needs for qualifying populations:

The priority needs for the qualifying populations include new housing development, tenant-based rental assistance (TBRA), non-congregate shelter, and supportive services. Over the past three years, the County has received made significant investments in supportive services, vouchers, permanent supportive housing for individual adults, and emergency rental assistance. These investments have been made possible through state, federal, local, and private funds. Additional permanent affordable family housing has been the most difficult need to address.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

The data presented in the HOME ARP plan was compiled through a number of sources including Homeless Management Information System (HMIS), 2022 Point in Time Count, 2023-2032 Housing Element, 2020-24 Consolidated Plan, Comprehensive Housing Affordability Strategy data (CHAS), and County of Marin program tracking materials for the Continuum of Care, Emergency Rental Assistance Program, Health and Human Service, and Community

Development Agency. Additionally, through consultations with community stakeholders and partner organizations the County was able to further determine priority needs and gaps in investments among eligible activities.

Each of the plans and sources reinforced the data on the existing, shelter, housing inventory, and service delivery systems and gaps, in particular the growing number homeless families and the need for investments in new additional affordable housing.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The County releases a Notice of Funding Availability/Request for Proposals (NOFA/RFP) annually to solicit applications from developers for a number of funding sources, including Permanent Local Housing Allocation (PLHA) and County Affordable Housing Funds (HTF). Consistent with CDA practices, HOME-ARP will utilize the open, competitive solicitation process for applications through the existing NOFA/RFP cycle. HOME-ARP funds will be used to leverage PLHA and HTF funding sources for greater impact. The NOFA/RFP guidelines will describe HOME-ARP requirements and be available to potential applicants prior to the NOFA/RFP release. In addition, CDA will modify any grant or contract agreement templates and monitoring policies and processes accordingly to ensure compliance with HOME-ARP.

Describe whether the PJ will administer eligible activities directly:

The County will administer HOME-ARP directly.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

The County will independently administer the HOME-ARP grant. We will retain administrative funds to support internal administration and planning costs associated with the HOME-ARP grant. The County will allocate 15% toward administration.

The County may consider allocating less toward administration. Any remaining resources would be allocated to approved funding activities.

Use of HOME-ARP Funding

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|-----------------------|-----------------------------|------------------------|
| Supportive Services | \$ 0 | | |
| Acquisition and Development of Non-Congregate Shelters | \$ 0 | | |

| | | | |
|--|--------------|------|-----|
| Tenant Based Rental Assistance (TBRA) | \$ 0 | | |
| Development of Affordable Rental Housing | \$ 2,467,167 | | |
| Non-Profit Operating | \$ 0 | 0 % | 5% |
| Non-Profit Capacity Building | \$ 0 | 0 % | 5% |
| Administration and Planning | \$ 435,382 | 15 % | 15% |
| Total HOME ARP Allocation | \$ 2,902,549 | | |

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

To address the priority needs identified, the County anticipates allocating HOME-ARP funds to two or three affordable rental housing projects, free of population specific deed restrictions that would prevent families or any of the qualifying populations from accessing units. The County will make funds available for acquisition, construction, and rehabilitation of permanent affordable rental housing.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The gap analysis reveals a large need for 5,375 additional affordable rental housing. The plan also identifies that family homelessness has increased by 35% in the past two years, and there have been no substantial affordable housing developments available to families in the past four years. Further the plan identified that over the past three years over \$80 million has been invested in supportive services, vouchers, emergency rental assistance, and the acquisition and construction of a new homeless shelter and three permanent supportive housing projects serving homeless adults. HOME-ARP will leverage local funding through PLHA and HTF to provide the necessary capital for the creation of permanent affordable housing accessible to families experiencing homelessness, at risk of homelessness, and domestic violence survivors.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

HOME-ARP funds will be used to create or preserve 30 affordable rental housing units for qualifying populations.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The County anticipates that HOME-ARP funds will create 30 more deeply affordable permanent housing units available for families across two or three developments with an affordability

period of 20 years. Together with other family affordable housing developments funded through other County sources, the priority of reducing family homelessness in our region will be addressed.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The County will give preference to families who are experiencing homelessness, at risk of homelessness, and families that are domestic violence victims and experiencing homelessness or at risk of homelessness. However, HOME-ARP supported units will be available to all qualifying populations. The County will ensure HOME-ARP funds support, develop, and preserve affordable rental housing and make units more deeply affordable to all qualifying populations.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

By giving preference to families who are experiencing homelessness and at risk of homelessness, and families that are domestic violence victims experiencing homelessness or at risk of homelessness, the County will address a historic lack of housing resources and capital investments into affordable housing projects serving this population. Up until very recently families have been effectively precluded from accessing permanent supportive housing through Coordinated Entry due to a concerted focus on assessing chronically homeless single adults entering them into the County's HMIS system. More recently there has been an effort to train more providers to use HMIS and get more families assessed and enrolled. However, families are still rarely able to access units and vouchers and units. In addition, over the past four years all substantial affordable housing projects developed have been deed restricted for seniors and homeless individuals. By implementing this preference the County will ensure HOME-ARP funds will substantially support these missing populations that often require larger units and different types of services.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The primary referral method for projects will be project-specific waiting lists. Each project will develop a detailed Affirmative Marketing Plan in partnership with community-based organizations serving the QPs. All qualifying individuals or families will be able to apply for placement on the waiting list for a project.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The County will not limit eligibility.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The County will not limit eligibility.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

The County will not limit eligibility.