



Sonoma County Community Development Commission
Sonoma County Housing Authority
1440 Guerneville Road, Santa Rosa, CA 95403-4107

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Commission*

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MEMORANDUM

Date: April 20, 2022

To: Community Development Committee (CD Committee)
Cities and Towns Advisory Committee (CTAC)

From: Rhonda Coffman, Community Development Assistant Manager

Subject: Sonoma County 2020 Consolidated Plan Action Plan: One-Year Use of Funds for Fiscal Year (FY) 2022-23 for the proposed use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG) funds and a Substantial Amendment to the FY 2021-2022 Action Plan for HOME and CDBG-CARES Act (CDBG-CV) funds.

The Sonoma County Community Development Commission (SCCDC) staff prepared a draft Action Plan for FY 2022-2023, and a second Substantial Amendment to the Action Plan for FY 2021-2022 based on the CDBG, HOME and CDBG-CV funding recommendations unanimously approved by the CD Committee and CTAC on March 16, 2022.

In FY 2020-2021 and FY 2021-2022, federal ESG was allocated in conjunction with other local services contracts by the Continuum of Care (CoC) Board. ESG funds were utilized to achieve stable funding with combined sources. In FY 2022-2023, federal ESG is recommended to support homeless shelters and homeless services and will be coordinated with other currently funded homeless services contracts as recommended by the CoC Board. The federal ESG funds are included in the draft FY 2022-2023 Action Plan.

The United States Department of Housing and Urban Development (HUD) requires submission of the Annual Action Plans to enable the "Urban County" entitlement jurisdiction to receive CDBG, HOME, ESG, and CDBG-CV funding. The Action Plans list the specific projects that are being approved to use a combined total of \$3,220,230 from these funding sources for affordable housing development and preservation, public facilities and improvements, rental assistance, emergency shelter operations, and services related to fair housing, homelessness prevention, case management, and financial stability, all to benefit lower-income residents, as well as administrative costs for SCCDC staff to operate these HUD-funded programs.

The following table includes the combined total of CDBG, HOME, ESG and CDBG-CV funding recommended to support the activities listed in the draft FY 2022-2023 Action Plan and the FY 2021-2022 Amended Action Plan.



Table 1 – Combined Action Plan Funding			
Project Sponsor	Project Name	Funding Source	Recommended Award
City of Sebastopol	Luther Burbank Farm ADA Restrooms	CDBG	\$146,000
Sweetwater Springs Water District	Wright Drive Water Main, Natoma Tank & Edgehill Booster Replacement	CDBG	\$169,472
Burbank Housing	Dry Creek Commons	CDBG	\$866,476
Disability Services & Legal Center	Housing Accessibility Modifications	CDBG	\$45,000
SCCDC	Housing Rehabilitation & Earthquake Resistant Bracing System Programs	CDBG	\$500,000
Legal Aid of Sonoma Co.	HOME - Housing Justice Program	CDBG - Public Services	\$194,000
Fair Housing Advocates of Northern CA	Fair Housing Education & Enforcement	CDBG - Public Services	\$84,526
Fair Housing Advocates of Northern CA	Fair Housing Education & Enforcement	CDBG - CV	\$25,000
Housing & Economic Rights Advocates	Financial Stability Legal Services	CDBG - CV	\$25,650
Community Action Partnership	HCA Family Fund	CDBG - CV	\$33,000
Homes 4 the Homeless	Case Management Program	CDBG - CV	\$25,000
Community Action Partnership	Sloan Housing Woman’s Shelter	CDBG - CV	\$57,367
Burbank Housing	Dry Creek Commons	HOME	\$400,000
So. Co. Housing Authority	Tenant-Based Rental Assistance	HOME	\$500,000
Catholic Charities	Sam Jones Hall Emergency Shelter	ESG	\$148,739
TOTAL			\$3,220,230

The draft FY 2022-2023 Action Plan and Substantial Amendment to the FY 2021-2022 Action Plan were prepared for a 30-day comment period, as required by HUD. The comment period started on April 1, 2022 and will conclude on May 1, 2022. Following the public comment period, and the recommendation of the CD Committee and CTAC, the draft Action Plans will be finalized and go before the Board of Supervisors for approval on May 3, 2022 at 8:30am.

Staff is requesting that the Committees make a recommendation for the Board of Supervisors’ approval of the FY 2022-2023 Action Plan and Substantial Amendment to the FY 2021-2022 Action Plan. In addition, because HUD has not yet published the FY 2022-23 CDBG, HOME, and ESG allocations for entitlement jurisdictions, staff requests that the Committees make recommendations for adjustments to the award amounts listed above in the event that a higher or lower level of funding is made available to the Urban County.

SONOMA COUNTY FY 2020 CONSOLIDATED PLAN – FY 2021-2022 ONE-YEAR ACTION PLAN SECOND SUBSTANTIAL AMENDMENT

Second substantial amendment to the FY 2021-2022 Annual Action Plan: Amended on May 5, 2022 to reprogram \$166,017 from prior year Community Development Block Grant (CDBG)-CARES Act (CV) funds to support five public service and fair housing activities that prevent, prepare for, or respond to Coronavirus.

The selection criteria for used to select eligible activities and programs for funding to meet Consolidated Plan goals were included in the FY 2022-2023 CDBG and HOME Funding Policies that were published with the Notice of Funding Availability in December 2021. Several applications for funding were received in January 2022 for eligible activities and programs. Based on these criteria, the Community Development Committee and the Cities and Towns Advisory Committee recommended CDBG-CV funding for the following five organizations and activities:

Fair Housing Advocates of Northern California: \$25,000

Housing and Economic Rights Advocates: \$25,650

Community Action Partnership – Sloan House Case Management: \$57,367

Community Action Partnership – Rental Assistance: \$33,000

Homes for the Homeless – Case Management Services: \$25,000

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The FY 2021-22 Action Plan is part of the 2020 Sonoma County Consolidated Plan covering FYs 2020-2021 through 2024-2025. The Consolidated Plan and Annual Action Plans are required by the U.S. Department of Housing and Urban Development (HUD) in order to receive certain federal housing, homelessness, and community development funds. Pursuant to a Joint Powers Agreement, the Sonoma County Community Development Commission (Commission) administers these funds on behalf of the HUD-designated Urban County entitlement jurisdiction, consisting of the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma. HUD funds received by the Urban County are Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Community Development Block Grant CARES Act (CDBG-CV) and the Emergency Solutions Grant (ESG) program funds. The projects and programs using these funds will be carried out either directly by the Commission or through funding provided to other governmental or

nonprofit agencies, to benefit low-income households by addressing the goals and objectives enumerated in the Consolidated Plan and summarized below.

The administration of CDBG, CDBG-CV and HOME for capital projects and for fair housing services are guided by funding policies set annually by the Commission with input from its advisory committees. The Commission uses a Community Development Committee (an appointed advisory committee made up of representatives from each supervisorial district, Housing Choice Voucher tenants, and a representative from the Human Services Department) and a Cities and Towns Advisory Committee, (an advisory committee made up of representatives from all Cities and Towns in the Urban County) to set these annual policies.

The administration of the CDBG homeless services set-aside, ESG and certain local and State funds for homeless services is guided by funding policies set annually by the Continuum of Care (COC) Board, the county's homeless system of care.

Once recommendations are made for CDBG, CDBG-CV, HOME and ESG by the Community Development Committee, Cities and Towns Advisory Committee and COC Board, these are incorporated into the annual Action Plan for adoption by the County Board of Supervisors.

For FY 2021-2022, the policies set aside funds for administration and the balance of funds are awarded through competitive processes in which eligible projects and programs applied for funding awards to meet the Consolidated Planning goals. The selection and scoring criteria for how goals would be met were set in the annual policies and in two separate Notices of Funding Availability: one for Capital Projects and one for Homeless Services and a Fair Housing Services set-aside.

The Commission's advisory committees made preliminary funding recommendations based on staff's review and analysis of the applicant projects and programs in two public meetings.

All minor or substantial amendments to the FY 2021-2022 Action Plan are carried out using the process identified in the Citizen Participation Plan and administered as described above.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This Action Plan, like previous Plans, organizes community priorities for the use of CDBG, HOME, and ESG funds by the Urban County by following the structure provided by HUD regulations, namely, by grouping said priorities into three categories: affordable housing, homelessness, and non-housing community development.

The Urban County's Consolidated Plan contains the following broad goals:

1. Affordable Housing: Increase and preserve the housing stock that is affordable, safe, and accessible for low-, very low-, and extremely-low families and individuals, including those with special needs and those who are homeless or at imminent risk of homelessness.
2. Homelessness: Promote effective and proven strategies for homelessness prevention and intervention countywide.
3. Non-Housing Community Development: a) Assist in creating and/or replacing infrastructure systems and public facilities that meet the needs of lower-income people, people with disabilities, and other special needs subpopulations county-wide; b) Promote the well-being and economic integration of lower-income persons through non-housing services, self-sufficiency programs, job training, and economic development assistance; and c) Promote Fair Housing by investing in services which assist low-income tenants with fair housing complaints, reasonable accommodations and eviction defense, each of which enables residents to remain in their home or extend their period of housing.

Each of these priorities has equity as its underlying foundation by ensuring that historically marginalized or disadvantaged communities have equal and fair access to the services provided through HUD funding

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Sonoma County has a long-standing history of being a very expensive housing market, especially in comparison to median household incomes. According to *Out of Reach 2019*, a publication of the National Low Income Housing Coalition, the average wage for Sonoma County renters in 2019 was \$18.25 and the "housing wage" necessary to afford the fair market rent for a one-bedroom apartment is \$27.83, indicating an overall wage shortfall of 34%. The gap rises to 50% for two-bedroom apartments, which require a wage of \$36.29 per hour. A report released by Apartment List in September 2018 found that over half of Sonoma County residents are cost-burdened (paying more than 30% of income on rent), and nearly a third are severely cost-burdened (paying more than 50% of their income on rent). Additionally, catastrophic wildfires in October 2017 and October 2019 and flooding in February 2019 destroyed or rendered uninhabitable nearly 6000 homes in the County. Furthermore, the global pandemic COVID-19, which was declared an emergency in March 2020, spurred the mass shutdown of businesses and subsequent layoffs Countywide. Though the Governor's office and County implemented moratoriums on evictions for renters who were suddenly unable to pay rent due to loss of income, County officials are seeking ways to keep renters who are in volatile economic positions from entering homelessness once the moratorium is lifted. Thus, even though earlier Consolidated Plans for the Urban County prioritized rental housing affordability, rental housing affordability remains a top priority.

Due mainly to the disparity in housing rents versus household incomes, Sonoma County has a high rate of homelessness. In 2020, the Annual Point-in-Time Homeless Census & Survey found that approximately 2,745 residents, are experiencing homelessness at any given time. Though this is a decrease of 7.7% from 2019, the rate of homelessness remains significantly higher than many of similarly-sized California counties and most of the nation. The funding of homeless intervention and prevention programs make up a large percentage of the "portfolio" of past performance and remains a top objective.

In the past, the Urban County members have prioritized the use of CDBG funds for Americans with Disabilities Act (ADA) retrofit projects, mainly the removal of architectural barriers identified in existing public buildings and infrastructure. This use of CDBG funds is highly effective in these projects because ADA retrofit projects can generally be successfully scaled and/or phased based on funding availability. During the last Consolidated Plan period, July 2015 to June 2020, ADA project funds in an aggregate amount of nearly \$3.5M were awarded to 36 different projects sponsored by the eight participating jurisdictions. These projects include sidewalk "curb cuts," and other path-of-travel retrofit projects along roadsides; library, park, and community center restroom ADA renovations; creation of ADA compliant bike paths; and community facility ADA retrofit upgrades. Additionally, CDBG dollars financed rehabilitation or accessibility modifications for over 250 low-income and senior homeowners and renters. These projects are essential to the community's residents who are mostly elderly or have disabilities, and therefore remain a high priority for the use of CDBG funds during the 2020-2025 Consolidated Plan period.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen input into this Annual Action Plan was sought primarily through multiple virtual public hearings, engagement with cities and towns on jurisdictional needs and community outreach to identify patterns in housing and economic concerns. Much of the citizen participation process was delayed or hindered due to the COVID-19 emergency declared by Governor Newsom on March 4, 2020, and by President Trump on March 13, 2020. In light of these events, the Commission gathered much of the public information virtually. It relied upon outreach efforts throughout the year that, while not directly for the Annual Action Plan, were designed to collect relevant data that provides insight into the most significant economic and housing needs expressed by Sonoma County residents. Additionally, a draft of the Annual Action Plan was made available to the public from July 9, 2021, through August 7, 2021. The draft is available on the Sonoma County Community Development Commission website and hard copies are available by request.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public input received was overwhelmingly focused on affordable rental housing, fair housing issues, homelessness, protected classes and the disproportionate affect that the pandemic has on them and the relationship between of these issues combined. Therefore, these are areas of prioritization that reflect public feedback and sentiment. Many comments were also received that expressed interest or concern about how federal funds might be used to respond to those most impacted by the ongoing COVID-19 crisis

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

Rental housing affordability, fair housing, and homelessness remain top priorities. In the advent of two fires, a major flood and a pandemic all in the last four years, housing stability has been shaken across the County, but has had particularly burdensome impacts for lower income renters and protected class populations. The public input to prioritize stable and equitable housing is more intense and broad-based than was voiced in the development phase of earlier Consolidated Plans.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Sonoma County	Community Development Commission
HOME Administrator	Sonoma County	Community Development Commission
ESG Administrator	Sonoma County	Community Development Commission

Table 1 – Responsible Agencies

Narrative (optional)

The Sonoma County Community Development Commission is the administrative agency charged with administering CDBG, CDBG-CV, HOME and ESG funding on behalf of the Urban County, a Joint Powers Agreement partnership consisting of the County of Sonoma, the Town of Windsor and the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The Sonoma County Community Development Commission houses the Sonoma County Housing Authority and administers all affordable housing finance programs for the unincorporated County of Sonoma. The Commission also hosts and staffs the county's COC and is the largest funder of homeless services countywide. The Commission actively participates in various collective action and community initiatives addressing the needs of lower-income members of the community, including, but not limited to, ACCESS Sonoma, the Renewal Enterprise District (RED), Health Action, and Upstream Investments. Because of these existing roles, the Commission is well-positioned to consult with private and public agencies about Consolidated Plan matters since the appropriate agency-to-agency relations are already in place.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The Sonoma County Community Development Commission is a County government agency, and its staff has regular and ongoing contact with County government departments and agencies including, but not limited to, the Department of Health Services (DHS) and the Human Services Department; Regional Parks; Permit Sonoma; and the newly formed Office of Recovery and Resilience. The Sonoma County Housing Authority is a component organization of the Commission. The Commission has regular and ongoing contact with the City of Santa Rosa Economic Development and Housing Department and Housing Authority. The COC Board, staffed by the Commission, includes dedicated seats for the County of Sonoma's Board of Supervisors, as well as one seat each for a member of the Santa Rosa City Council, and the Petaluma City Council. The Commission stages annual competitions for federal and local public services funding and in doing so, establishes ongoing relationships with a large percentage of community-based non-profit agencies with homelessness, affordable housing, and related services. The County of Sonoma's planning, building, zoning and land use department is known as Permit Sonoma. The Commission has regular contact with Permit Sonoma to enhance affordable housing program coordination. The Chair of the Commission's advisory committee (the Community Development Committee) is the Assistant Director of the Human Services Department. The Commission created and launched the RED which now operates independently as a Joint-governmental organization between the City of Santa Rosa, the County of Sonoma, and private developers. The RED works across jurisdictions to market and attract developers, to blend private financing and public funds, to leverage state and federal grant funds and to facilitate creation of housing that meets established public policy goals for increased density, access to transit, protection of open space and community separators and improving energy efficiency, climate resilience and affordability. The Commission also works in close coordination with staff from DHS on building internal infrastructure and coordinating efforts around joint housing and health interventions for the County's homeless population.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

In November 2020, the County's CoC, Home Sonoma County, reverted to its previous CoC Board structure due to an error in reorganization in 2018. The Sonoma County Community Development Commission leads, hosts and staffs the 15 member CoC Board and fully integrates that role with other related Commission roles such as funder of homeless, housing, and community services, Homeless Management Information Systems (HMIS) administrator, and Coordinated Entry. The CoC Board provides structure to the homeless system of care in order to make policy decisions and measure results for ending homelessness throughout the county. The meetings of the CoC Board and its Committees and working groups help forge new connections and working relationships with many participants as well as responding to the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requirements.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Sonoma County Community Development Commission's Ending Homelessness division is responsible for ESG program administration as well as for hosting and staffing Home Sonoma County and coordinating the County HMIS. Thus, funding prioritization, policy and standards development, and funding administration are fully integrated. Also, through its representation on the Home Sonoma County Leadership Council and interjurisdictional staff consultation, the Commission coordinates with the cities of Santa Rosa and Petaluma in allocating ESG funding in those cities, which lie within the geography of Home Sonoma County/the CoC. The Commission's Home Sonoma County staff regularly coordinate with both staff and civic leaders in the cities of Santa Rosa and Petaluma, the State Department of Housing and Community Development, and the State Business, Consumer Services and Housing Agency—not to mention with elected leaders of the County of Sonoma—through study sessions, formal presentations, and informal consultations on implementation of their Consolidated Plans and related matters of concern.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CITY OF SANTA ROSA
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited the city to provide Plan input through public meetings or direct communication. The Commission coordinates regularly with the City on the administration of housing programs. The anticipated outcome of the consultation was to ensure continued coordination and to complement the City's 5-Year Consolidated Plan
2	Agency/Group/Organization	City of Cloverdale
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
3	Agency/Group/Organization	City of Cotati
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
4	Agency/Group/Organization	City of Healdsburg
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
5	Agency/Group/Organization	CITY OF ROHNERT PARK
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.

6	Agency/Group/Organization	City of Sonoma
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
7	Agency/Group/Organization	City of Sebastopol
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
8	Agency/Group/Organization	Town of Windsor
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
9	Agency/Group/Organization	City of Petaluma
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. The Commission coordinates regularly with the City on the administration of housing programs. The anticipated outcome of the consultation was to ensure continued coordination and to complement the City's 5-Year Consolidated Plan.
10	Agency/Group/Organization	Fair Housing Advocates of Northern California
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Fair Housing Advocates of Northern California (FHANC) is the CDBG funded Fair Housing provider for the Urban County. The agency has provided training on Fair Housing. FHANC primary services involve fair housing counseling, investigation, and enforcement to Sonoma County residents
11	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. Agency is recognized leader in providing homeless services in the Urban County. The anticipated outcome of the consultation was improved coordination with a regional homeless services provider.
12	Agency/Group/Organization	Committee on the Shelterless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. Agency is recognized leader in providing homeless services in the Urban County. The anticipated outcome of the consultation was improved coordination with a regional homeless services provider.

Identify any Agency Types not consulted and provide rationale for not consulting

All groups were either consulted or invited to participate in the Plan process. There was no decision to exclude any group.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Sonoma County Community Development Commission	The County's Continuum of Care, is staffed by the Community Development Commission. Staff work to ensure that plans and goals are consistent and complementary.
2020 Assessment of Fair Housing	Sonoma County Community Development Commission	The Assessment of Fair Housing illuminates where discrimination and barriers to accessing housing exist for protected class populations, and serves as the framework for the Community Development Commissions inclusion of equity in all policy examination. Efforts to hold community meetings, focus groups and interview members of protected classes are currently underway.
Sonoma County Recovery Framework	Sonoma County Community Development Commission County Office of Recovery and Resiliency	The Framework was prepared by the County's Office of Recovery and Resiliency in collaboration with other County departments and agencies, cities and other jurisdictions, nonprofits, and community stakeholders in response to the 2017 Sonoma Complex Wildfires. The Framework is a culmination of input provided by community members and stakeholders during an extensive community engagement period to gather information on needs and action items for five key strategic areas: Community preparedness and infrastructure; Housing; Economy; Safety Net Services; and Natural Resources

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation outreach includes public meetings of the Community Development Committee, Cities & Towns Advisory Committee, The CoC Board, Technical Advisory Committee, and sub-committee working groups, public notices, email "blasts," and the use of the CDC website, which is accessed by numerous community partners. The Community was also widely engaged following the 2017 and 2019 fires in Sonoma County and during surveying and focus group activities as part of the 2020 Assessment of Fair Housing process. These efforts were especially fruitful and generated much comment on the escalating cost of rental housing, the shortage of housing supply, the local homelessness situation, disparate impacts of disasters, fair housing concerns and the effects that the pandemic has had on protected classes, and other factors contributing to housing insecurity and homelessness in the County.

From July 9, 2021, through August 7, 2021, the Draft Annual Action Plan was made available to the public. A notice was published in the newspaper to announce its availability as well as radio public service announcements. The Plan was released when offices were still operating in a hybrid model due to the global pandemic, and therefore physical copies were only available by request. During this time, four hard copies were requested by and mailed to members of the public. The Draft Plan was distributed via email to a broad list of stakeholders and posted on Commission social media pages. Additionally, a public hearing on the projects recommended for formula grant funding was held on Tuesday, June 29, 2021 and a subsequent hearing to take comment on the full plan on July 21, 2021. Both meetings were held virtually to comply with the Governor's Executive Orders N-25-20 and N-29-20 to prevent the spread of COVID-19

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	members of the public attended the virtual meeting	no public comments were made regarding the Action Plan during this meeting	all comments were accepted	https://sonomacounty.ca.gov/CDC/Plans-Policies-and-Reports/
2	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	NA	NA	all comments were accepted	https://santarosapressdemocrat-ca.newsmemory.com?selDate=20210709&goTo=C04&artid=3
3	Internet Outreach	Non-targeted/broad community	NA	NA	all comments were accepted	https://sonomacounty.ca.gov/CDC/Plans-Policies-and-Reports/

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The amount of CDBG, HOME, and ESG funds expected annually is approximately \$2.9 million. Based on consistent historical trends, these funds are expected to leverage many times this amount in other, non-federal funds, each year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,853,042	472,900	0	2,325,942	5,095,934	CDBG will be used for a variety of purposes including housing and capital projects and programs, ADA retrofit and other public facility/improvement projects and non-housing services

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	825,404	46,700	444,500	1,316,604	2,711,924	HOME funds will be used to finance affordable rental housing development and preservation, and to provide tenant-based rental assistance
CDBG-CV	Public Federal	Public services activities			166,017	166,017	1,741,722.75	Supplemental CDBG funds provided through the CARES Act to prevent, prepare for, and respond to the coronavirus.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	160,798	0	0	160,798	493,442	ESG funds will be used almost entirely for rapid re-housing programs for homeless persons. A small portion of funds may continue to be used to support shelter operations as may be permitted by regulations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Admin and Planning Rapid re-housing (rental assistance) Other	4,112,614	0	0	4,112,614	11,793,022	CoC funds will be used almost entirely for permanent supportive housing projects that currently serve 261 homeless persons, almost entirely dedicated to chronically homeless populations, and a small amount of rapid re-housing funding for victims of domestic violence. A small portion of funds will continue to be used to support mandated system infrastructure costs such as HMIS data systems, Coordinated Entry and CoC planning and management.
Section 8	public - federal	Rental Assistance	38,113,294	0	0	38,113,294	107,855,102	Section 8 funds are used for tenant based and project based vouchers and are administered by the Sonoma County Housing Authority.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how

matching requirements will be satisfied

Generally speaking, based on consistent historical trends for nearly all affordable housing projects, HOME and CDBG funds can be expected to leverage 3-30 times the amount of funding making up a project's capital development budget. The funding leveraged includes tax credit equity investment, local affordable housing funds, and State of California housing program funds. For public services, CDBG and ESG typically leverage, in aggregate, similar ratios. These leveraged operational funds include local government funds, private and foundation donated funds, federal CoC funds, and state ESG program funds, and significant new State initiatives begun in 2018. CDBG-funded fair housing and ADA retrofit projects tends to leverage less, in practice, and in some instances, CDBG is the sole source of funding. The funding application process utilized by the Commission requests applicants describe and quantify leveraged funding and the funding policies encourage leveraging by making it an evaluation criteria. Through the funding contract administration process, all awardees are required to rigorously document the amounts and sources of leveraged funds.

HOME Match Requirement: The HOME regulations require a 25% match for all HOME funds used, excluding HOME funds used for CHDO operational expense, and general program administration. The Sonoma County Community Development Commission estimates that the leveraged funds will generate match sufficient to cover the match obligation for the HOME loans to rental housing projects. Any residual match will be credited against the Tenant Based Rental Assistance (TBRA) program match obligation. Any balance of the TBRA match obligation will be drawn from the previously accumulated match that the Commission has earned. The Commission will calculate the match value of the property tax waiver that the projects receive when the rental housing projects become operational and add the match value to the Commission's match tracking system.

ESG Match Requirement: The ESG regulations require grantees to provide a 100% match for all ESG funds used. Any projects to be funded through the Commission must document sufficient match through funds from other sources including but not limited to contributions, client fees, incidental program revenue and rent, foundation grants.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In general and historically, local government has frequently provided land for many affordable housing projects. The Commission currently owns a 6 acre parcel in the former Roseland Redevelopment Area, and another 7 acre property purchased in 2016 which served as the office location of the Sonoma Water Agency. The County's department of General Services maintains a list of underutilized County properties as the discussion around utilizing publicly owned land continues.

Discussion

DRAFT

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2025	Affordable Housing		Affordable Housing	HOME: \$526,948 Section 8: \$38,113,294	Tenant-based rental assistance / Rapid Rehousing: 3292 Households Assisted
2	Homelessness	2020	2025	Homeless		Homelessness	ESG: \$160,798 Competitive McKinney-Vento Homeless Assistance Act: \$4,112,614	Tenant-based rental assistance / Rapid Rehousing: 300 Households Assisted Homeless Person Overnight Shelter: 750 Persons Assisted
3	Non-Housing Community Development	2020	2025	Non-Homeless Special Needs Non-Housing Community Development		Non-Housing Community Development	CDBG: \$1,204,477	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4741 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 300 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	
2	Goal Name	Homelessness
	Goal Description	
3	Goal Name	Non-Housing Community Development
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

In FY 2021-2022, Sonoma County will receive \$1,853,042 in CDBG funds. CDBG funds will be used for housing, fair housing services, homeless services, public improvements, and public facilities, all of which must be awarded for projects and programs that affirmatively further fair housing. Federal regulations impose a 15 percent maximum cap on funding to be expended for public service activities. Administrative costs are limited to 20 percent of the total CDBG funding and 20 percent of program income received.

In FY 2021-2022, Sonoma County will receive \$825,404 in HOME Program funds. An additional \$444,500 in HOME reprogrammed funds from FY 2017-18 (\$102,356) and FY 2018-19 (\$342,154) will also be available during the fiscal year. The funds will be used for new rental construction, housing rehabilitation, and tenant-based rental assistance. Federal regulations require a minimum of 15 percent of each year's HOME allocation to be set-aside for projects sponsored by CHDOs.

In FY 2021-2022, Sonoma County will receive \$160,798 in ESG funds. This year, one homeless shelter proposal was recommended for funding

Projects

#	Project Name
1	CDBG - General Administration
2	ESG 21 Sonoma County
3	Acquisition, Disposition and Predevelopment
4	2021 Affordable Housing
5	CDBG 2021 Public Facilities and Infrastructure Improvements
6	CDBG 2021 Fair Housing and Housing Justice Program
7	2021 HOME Administration

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The above-listed set of projects using Community Development Block Grant, HOME Investments Partnership Program and Emergency Solutions Grant will be used to meet the 2020 Consolidated Plan goals.

The projects will meet the policy goals approved by the CoC Board and will comply with the regulatory

requirements, especially meeting defined objectives of each funding source and timely spending of awarded funds. Some projects were recommended for partial funding based on staff analysis of the ability to spend funds in a timely manner. If funds are spent more quickly than anticipated and program income or reprogrammed funds become available, these funds can be used to support these projects. Staff will bring recommendations to the committee for an action plan amendment that would allow more funding to be awarded for these at a later time.

The County did not receive an eligible application for our remaining \$536,605 in FY 2021-22 HOME funds, but we will be looking to provide funds to a project or projects in the coming program year. In addition, a Community Housing Development Organization (CHDO) Affordable Housing Project is to be determined as well for the set aside of \$123,811. HOME Program Income is anticipated to be \$46,700 and we will be looking to provide funds to a project or projects in the coming year. CDBG Program Income is anticipated to be \$472,900 and we will be looking to provide funds to a project or projects in the coming year.

DRAFT

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	CDBG - General Administration
	Target Area	
	Goals Supported	Affordable Housing Non-Housing Community Development
	Needs Addressed	Affordable Housing Non-Housing Community Development
	Funding	CDBG: \$370,608
	Description	
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	Countywide Administration of CDBG activities
2	Project Name	ESG 21 Sonoma County
	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$160,798
	Description	\$148,738 will go to the Catholic Charities Sam Jones Hall and \$12,060 will go to ESG Administration
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	756 Individuals supported by beds at the shelter
	Location Description	Countywide
	Planned Activities	Homeless Shelter
3	Project Name	Acquisition, Disposition and Predevelopment
	Target Area	
	Goals Supported	Homelessness

	Needs Addressed	Homelessness
	Funding	CDBG: \$406,977 CDBG-CV: \$141,017
	Description	The County will utilize CDBG funds, including entitlement funds and program income, to fund projects that lead persons out of homelessness or prevent homelessness.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	approximately 300 individuals
	Location Description	Countywide
	Planned Activities	Funds will be awarded for completion of one or more NEPA Environmental Assessments.
4	Project Name	2021 Affordable Housing
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$526,948
	Description	The County will utilize CDBG funds, including entitlement funds and program income, to fund predevelopment on affordable housing projects. HOME Funds will be used to create affordable housing opportunity through construction of new units and Tenant-Based Rental Assistance for low-income individuals. The County did not receive an eligible application for our FY 2021-22 HOME funds, but will be looking to provide funds to a project or projects in the coming program year. \$444,500 in FY 2017-18 and FY 2018-29 reprogrammed HOME funds will be used for the Sonoma County Housing Authority's Tenant-Based Rental Assistance program.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	152 households will receive Tenant Based Rental assistance for rental subsidies and/or security deposits.
	Location Description	Countywide

	Planned Activities	Tenant Based Rental Assistance
5	Project Name	CDBG 2021 Public Facilities and Infrastructure Improvements
	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$797,500
	Description	The County will utilize CDBG funds to improve public facilities and public infrastructure to meet the demands of citizens in low- and moderate income (LMI) areas or to meet the needs of LMC in specific areas. This will include ADA accessibility improvements and infrastructure updates.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4,741 Low Income Individuals
	Location Description	
	Planned Activities	Water system improvements to increase water pressure and install fire hydrants in underserved areas, and ADA improvements for recreational/municipal facilities and sidewalks in low-moderate income areas
6	Project Name	CDBG 2021 Fair Housing and Housing Justice Program
	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$277,956 CDBG-CV: \$25,000
	Description	Funds will be used to support a robust Fair Housing Education program as well as legal services to provide eviction defense for residents and related housing stabilization programs.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	750 Households, 1100 people will be assisted

	Location Description	County Wide
	Planned Activities	
7	Project Name	2021 HOME Administration
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$82,540
	Description	Administration of the 2021 HOME Partnerships Program for the County of Sonoma. This will include consulting and technical assistance services as well as program planning efforts and project delivery. There is no corresponding National Objective for Administration though these efforts support the successful completion of all other projects and activities.
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	County wide
	Planned Activities	Countywide administration of HOME programs

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

This FY 2021-2022 Action Plan, Year 2, encompasses activities undertaken by the County of Sonoma, as well as the seven municipalities comprising the HUD entitlement Urban County: Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor. Sonoma County does not dedicate funds to target areas.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Urban County jurisdictions share CDBG funds for capital projects and economic development programs in rough proportion to the number of low-income residents living in each area. Particular attention has been paid to tracking the geographic distribution of these dollars, and in the 2020 Consolidated Plan, a focus on communities that have experienced historic disinvestment of public resources will be prioritized.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Below are the anticipated numbers of households that will be supported through Consolidated Planning funds in 2021-2022. These goals were predicated on a regular year, before COVID-19 created many project delays.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	33
Special-Needs	5
Total	338

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	312
The Production of New Units	0
Rehab of Existing Units	26
Acquisition of Existing Units	0
Total	338

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Healdsburg will rehabilitate Victory Studio Apartments in Healdsburg, 11 rental apartments, affordable to extremely low- and low-income households. Disability Services and Legal Center (DSLCL) will operate a Housing Access Modification program installing ADA upgrades to 5-6 homes. The Commission in its role as the Housing Authority will provide tenant-based rental assistance to 12 vulnerable households. The Commission’s Housing Rehabilitation program will rehabilitate at least 10 homes for low-income seniors and residents with disabilities. ESG funds will be used to support Rapid-Rehousing programs which will serve approximately 300 persons.

AP-60 Public Housing – 91.220(h)

Introduction

Sonoma County's 2011 *Analysis of Impediments to Fair Housing Choice* cited the lack of affordable housing as a barrier for low-income persons to find adequate housing. The shortage of affordable housing has only become worse since the October 2017 Sonoma Complex Fire. While the Sonoma County Housing Authority (Housing Authority) has no public housing, the Commission will continue to use its Housing Choice Voucher Program, CDBG and HOME funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons. The Housing Authority will continue to pursue all new voucher opportunities that become available.

Actions planned during the next year to address the needs to public housing

The Urban County does not operate public housing. During the next year, the Commission will continue to address the priority housing needs discussed in the 2020 Consolidated Plan. The County will primarily focus resources on rental housing development and preservation. As opportunities arise, the County also will devote resources to affordable homeownership opportunities for lower-income first-time homebuyers

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

The Urban County does not own or operate public housing units. The Sonoma County Community Development Committee (the advisory board to the Sonoma County Community Development Commission and the Sonoma County Housing Authority) includes two Section 8 participants and serves as the Housing Authority's resident advisory board.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

HUD has designated the Sonoma County Housing Authority as a "high performer" agency for the past 20 years consecutively.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Sonoma County Community Development Commission combines ESG, California Emergency Solutions and Housing (CESH), \$3.5 million in one-time State Homeless Housing Assistance and Prevention (HHAP) program funds and other State and local funding allocations into a consolidated funding process for Homeless Services programs. Homeless services funding priorities focus on interventions that demonstrably impact the CoC's system-wide Performance Measures.

The Commission staffs the CoC Board and its working groups, which comprise the local CoC. In addition to the funding cycle described above, another \$3.9 million annually in CoC funding is used annually to address homelessness. As Lead Agency for the CoC Board and the only ESG entitlement jurisdiction in Sonoma County, the Commission has entered into an agreement with the California Department of Housing and Community Development to act as Administrative Entity for a \$213,044 allocation of Balance of State ESG funds (for the non-ESG entitlement jurisdictions of Santa Rosa and Petaluma) plus CESH, a State-funded program with eligible uses similar to ESG, currently estimated at \$457,360 for FY 2021-22.

In addition, a private donor contributes \$600,000 annually to a homeless prevention fund operated by an awardee; that single donor has contributed over \$7 million to date.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

Since 2015, the Commission has contracted with Catholic Charities to operate a Homeless Outreach Services Team (HOST) street outreach program to engage unsheltered persons living along waterways and in parks, assess their needs with an evidence-based assessment tool, and place people into housing as quickly as possible. As the system of care shifted its focus to the most vulnerable unsheltered persons, especially with the advent of Coordinated Entry throughout the county geography, a County Integrated Multi-Disciplinary Team (now rebranded as HEART) has significantly increased county-wide engagement efforts to difficult to serve populations. Additional street outreach teams with local knowledge have been launched in each region of the county, and all outreach teams work collaboratively. Street outreach teams work closely with the Coordinated Entry System, which provides standardized assessment and housing placement for all homeless populations.

In FY 2020-21, \$325,651 in combined State and local funds have been added to the HOST project to enable the HOST Team to reach 700 unsheltered persons throughout the Urban County, including underserved areas such as the Sonoma Valley; outreach to transition age youth has been expanded to

serve up to 500 unsheltered youth with \$211,542 in combined State and local funds. In addition to these investments, a combined \$200,000 has been allocated to targeted outreach activities in rural areas of the Urban County.

Addressing the emergency shelter and transitional housing needs of homeless persons

The focus of Sonoma County's emergency shelter and transitional housing programs is establishing safety through trauma-informed care, to stabilize and more quickly house participants. In FY 2020-21, CDBG funds will support 332 single adults at the 100-bed Mary Isaak Center Emergency Shelter and 85 women and children at the YWCA's 27-bed domestic violence safe house. In addition, ESG, local, and State Homeless Emergency Aid Program (HEAP) funds are allocated to support 370 children and their families at Catholic Charities' 138-bed Family Support Center. In FY 2020-21, the Commission will use local and State funds to support 500 single adults at Catholic Charities' 213-bed Samuel Jones Hall, 91 women and children at Community Action Partnership's 22-bed Sloan Women's Shelter; 33 youth at Social Advocates for Youth's (SAY) 12-bed Transitional-Aged Youth (TAY) Emergency Shelter and another 81 youth at SAY's Dream Center Emergency Shelter. In addition, the Commission will use local and State HEAP funds to support winter shelter expansions offered by Catholic Charities' Family Support Center, Committee on the Shelterless (COTS), Sonoma Overnight Support (in the Sonoma Valley), SAY, and West County Community Services in unincorporated Guerneville—all of which serve the Urban County. Lastly in FY 2019-20, the County of Sonoma invested new State funding in operation of an "indoor-outdoor" shelter serving 60 vulnerable individuals in tiny shelters on the grounds of a former juvenile justice facility, to mitigate the impact of unsheltered persons with significant service needs congregating in County parks. While the County undertook this effort in the midst of an emergency declaration, operations have been determined necessary on an ongoing and indefinite timeline.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Permanent supportive housing is the key service intervention for chronically homeless persons and for ensuring they do not become homeless again. Permanent supportive housing is also the Sonoma County system of care's greatest need, and therefore the homeless services competitive funding cycle prioritizes permanent supportive housing capital development, services, and operations above all other uses, as long as these are eligible expenses. In FY 2021-22, the Community Development Commission has allocated ESG- Coronavirus (ESG-CV) dollars and State ESG dollars, with other local and State funds, for two Rapid Re-Housing projects (operated by Interfaith Shelter Network and Catholic Charities) that will serve up to 143 households. Local and State funds which will support Rapid Re-Housing assistance for another 270 households throughout the Urban County. Local and State HHAP funds for the cost of

services and housing operations at eight permanent supportive housing projects serving 310 persons in Cotati, Cloverdale, Rohnert Park, Santa Rosa, and Sebastopol. Funding for supportive services and housing operations provided by Catholic Charities, Community Support Network, COTS, Reach for Home, and West County Community Services. In addition, the Commission acts as a collaborative applicant for \$3.9 million in CoC funding, which supports permanent supportive housing for approximately 260 formerly chronically homeless persons throughout Sonoma County.

Through partnerships with Partnership HealthPlan of California, Kaiser and St Joseph Health, 11 new permanent supportive housing beds have become available for the chronic homeless who are super utilizers of the emergency room with complex medical conditions.

In March 2018 the Housing Authority instituted a referral program providing streamlined accessibility to households registered with Sonoma County Coordinated Entry. Households referred by Coordinated Entry for this program are provided an opportunity to receive a Housing Choice Voucher.

In July 2018 the Housing Authority instituted a move-on program to free up beds in permanent supportive housing facilities. The people who are “moved-on” are provided with a Housing Choice Voucher, freeing up a PSH bed for another chronically homeless individual or family in need of supportive services.

Finally, the Housing Authority initiated a new CoC funded permanent supportive housing program targeting homeless individuals with chronic health conditions

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Commission works with Coordinated Entry to provide linkage for individuals existing health care systems via staff co-located at hospitals as well as a weekly Transitions of Care with hospital and clinic leads that emphasizes placement of individuals exiting hospitals, particularly at risk of COVID complications. For mental health facilities, the Commission works closely with Sonoma County's Health Services Department and its Behavioral Health Division, particularly the Crisis Stabilization Unit. Correction partners include the Sonoma County Department of Probation and its primary contractor, Interfaith Shelter Network, who provide linkages to transitional housing for justice involved individuals for placement prior to becoming homelessness. Youth providers, including Social Advocates for Youth, provide homelessness prevention services and work closely with Commission staff to prevent

transition age youth from becoming homeless.

Public and private agencies – such as the Department of Health Services and the Department of Human Services and private healthcare also work closely with the Commission. Most notably, Partnership Health Plan of California partners with the Commission to provide over \$5 million in funds for local nonprofits for both homeless services and capital development for those receiving health benefits. The Commission’s Ending Homelessness Manager works closely with the County Foster Youth Liaison to provide services for youth.

Discussion

The County of Sonoma endeavors to enhance the capacity of County programs and community systems to more effectively meet the changing needs of individuals, families, and communities in Sonoma County by following the concept of “*upstream investments*.” Upstream investments are defined as opportunities to provide prevention or intervention assistance before more expensive consequences develop. The Commission and Home Sonoma County are supporting this concept by prioritizing homeless and supportive housing programs and expanding the use of evidence-based practices with tools such as the Housing First Self-Assessment Tool.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Sonoma County's 2011 Analysis of Impediments to Fair Housing Choice cited the lack of affordable housing stock as a barrier to affordable housing for residents living in Sonoma County. The Commission will continue to use its CDBG and HOME funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons.

In a 2020 study, the California Housing Partnership Corporation found that 77% of Sonoma County's lowest-income renters are severely rent burdened, leaving little left for food, transportation, health or other essentials. The poverty rate in Sonoma County rises from 10.3% to 17.9% when adjusted for housing costs and social benefits. The California Housing Partnership Corporation estimates that Sonoma County needs 16,825 new affordable rental homes to meet current demand. This number represents the approximate number of renter households currently living in overcrowded conditions or facing severe housing cost burdens.

As mentioned in the Market Analysis of the Consolidated Plan, the State of California requires each jurisdiction's General Plan Housing Element to identify constraints to housing development and to identify measures the jurisdiction will undertake to ameliorate those constraints. SP- 55 of the Consolidated Plan provides a list of the type of measures likely to be undertaken by one or more of the individual jurisdictions. Because the Urban County is comprised of eight different jurisdictions, seven municipalities plus the County of Sonoma, it is not possible to identify the cumulative measures planned by the eight jurisdictions for FY 2021-2022. However, each jurisdiction has a Housing Element that identifies its various programs and actions steps specific to their communities. The websites for these Housing Elements are listed in MA-40 and SP-55 of the 2020-2025 Consolidated Plan.

The Commission in partnership with the cities of Santa Rosa and Petaluma is currently underway with an updated Analysis of Impediments/Assessment of Fair Housing that looks at barriers to fair and affordable housing and economic opportunities for marginalized communities countywide

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Commission ensures compliance with the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 for all new housing construction projects. This includes that, at a minimum, five percent of the total dwelling units or at least one unit in a multifamily housing project, whichever is greater, shall be made accessible for persons with mobility impairments. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in § 8.32 is accessible for purposes of this section. An additional two percent of the units (but not less than one unit) in such a

project shall be accessible for persons with hearing or vision impairments.

In addition, the Commission requires all projects receiving HOME funds to adhere to the requirements of 24 CFR 92.351 and to follow its affirmative marketing procedures and requirements for rental and homebuyer projects containing 5 or more HOME-assisted housing units. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability.

Furthermore, Permit Sonoma, uses a number of tools to remove barriers to affordable housing: A Reasonable Accommodation Ordinance, in place for more than 10 years, allows exceptions and modifications to standards and policies for siting, development, and use of housing that gives persons with disabilities equal access to housing of their choice; local Density Bonuses for affordable housing and housing that incorporates Universal Design; an Affordable Housing Program that requires all new development contribute to development of new affordable housing, through on-site construction, payment of fees, or the equivalent; repeal of a Growth Management Ordinance that was hindering new affordable housing development; and streamlined provisions for accessory dwelling units and junior accessory dwelling units making it easier to build both, which will contribute to the affordable housing stock.

Over the next several months, the Urban County and cities of Santa Rosa and Petaluma will be completing an Assessment of Fair Housing report. Part of the Assessment includes setting Fair Housing Goals and Priorities.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

All of the projects recommended for funding under this FY 2021-2022 Action Plan address one or more of the obstacles to meeting underserved needs delineated in the Consolidated Plan. The projects recommended for funding in FY 21-22 also take into account the impact of the 2017 and 2019 fires on vulnerable populations. Also, the County of Sonoma has committed County General Funds to support programs that serve the needs of the most vulnerable in the community through the County Fund for Housing (CFH). The Community Development Commission has allocated the maximum amount of income from its former redevelopment assets that are allowable under State Redevelopment Law to rapid re-housing and homelessness prevention services. The County will also receive approximately \$4.7 million in the 2020-21 Fiscal Year in CDBG-DR funds from the State in response to the 2017 Federally declared disasters. Projects and programs recommended for funding demonstrate efficiencies to best utilize the decreasing amounts of funding available to support their endeavors. Affordable housing projects recommended for funding are based on readiness to proceed and innovative approaches to overcoming regulatory barriers and provide or preserve both rental and homeownership housing opportunities for lower-income persons, especially households at risk of homelessness. Housing rehabilitation projects serve low-income homeowners, who are often elderly or disabled. Loans provided to these households help to keep them from becoming homeless and preserve the existing affordable housing stock. Emergency rental assistance and family self-sufficiency activities enable lower-income individuals and families to obtain and retain rental housing in the high-priced market in Sonoma County. The high cost of housing is a contributing factor in the County's homeless population, especially following the October 2017 fires which exacerbated an already tight rental market. The emergency shelter, transitional housing, permanent supportive housing, and homelessness prevention and rapid re-housing assistance recommended for funding assist those in need to move as quickly as possible towards stable, permanent housing

Actions planned to address obstacles to meeting underserved needs

In response to Sonoma County's overheated housing market, low vacancy rates for rental housing, high cost of home ownership, and a much higher than normal percentage of homeless residents needing housing in our jurisdiction, and the post-fire recovery needs impacting our community, the Commission has never had a more important impetus to meet the needs of those who are underserved in our community.

The 2020 Point-in-Time Homeless Count showed that the total number of people experiencing homelessness on any given night in Sonoma County declined, despite a 6% increase in the immediate aftermath of the 2017 Sonoma Complex Fire disaster. Following the 2017 fires, the Commission's Homeless Count has included a telephone survey to learn about people who are living in unstable situations. These are people who are couch surfing or doubled up, or who have no lease. People living in these situations are the most at risk of becoming homeless. The study showed that approximately

21,725 County residents are living in these unstable situations – 7% of County households. More than half of these lost their housing as a direct result of the fires or due to the fires' economic impact. The annual homeless count, along with the new telephone survey suggest a new wave of people are already becoming homeless as they exhaust their resources following the fires. Thousands more are at risk.

In December 2019, in response to a massive encampment and public health emergency along one of the County Parks department's biking trails, the Sonoma County Board of Supervisors made a range of new investments to expand permanent supportive housing, temporary shelter, and supportive services appropriate to the needs of unsheltered and vulnerable persons. These investments represented an unprecedented collaboration between County agencies to address underserved needs. The efforts began as a result of the encampment clearing, and State declared homeless emergency continues into 2021-22 with a sense of collaboration continuing as the hallmark of the County response.

Actions planned to foster and maintain affordable housing

In response to *Sonoma County's 2011 Analysis of Impediments to Fair Housing Choice* report which cited the lack of affordable housing as a barrier to fair housing choice, the Community Development Commission will continue to use its CDBG, ESG, and HOME funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons. In addition, in FY 2021-2022, the Commission has committed most of its 15% CDBG public services set-aside to a robust, fair housing program, that includes eviction defense. Staff is working with partners to ensure that the scope of contracted fair housing providers is responsive to the needs identified in the 2011 Analysis of Impediments and reflects fair housing program best practices. Furthermore, the Commission has begun its *2020 Assessment of Fair Housing* to thoroughly examine fair housing issues in our community including segregation, disparate impact of local policies on protected classes, and disparate access to education, jobs, and transportation, and housing.

Actions planned to reduce lead-based paint hazards

Making housing lead-safe is the most effective strategy to protect children from lead poisoning. The Community Development Commission addresses this through proactively distributing printed information concerning lead-based paint hazards to all residents of housing rehabilitation and rental assistance programs. The Commission's Housing Quality Standards (HQS) Inspectors have received training in visual assessment of lead-based paint hazards and are observant of the existence of this hazard during their property inspections, thereby preventing exposure to lead hazards by identifying the risks before families with children under six years of age move into rental units that are assisted by the Housing Authority.

The Commission's Construction Services Specialists are trained in the identification of lead hazards, proper methods of paint stabilization, interim control, abatement procedures, and testing/clearance reports to ensure compliance with all lead hazard reduction requirements during rehabilitation

activities. Additionally, Construction Services is investing in staff training, so the Commission will have a certified lead tester to identify the level of abatement required during future rehabilitation projects. Any dwellings not exempt from HUD's lead hazard reduction provisions (single-room occupancy, dedicated senior housing and housing construction after 1978) renovated under the Housing Rehabilitation Program undergo a lead hazard risk assessment by a state-certified Risk Assessor before the formulation of the project's scope of work. Any identified lead hazards are addressed in the scope of work, and a certified clearance is obtained before the project is considered complete.

The Commission will also ensure compliance with lead hazard reduction requirements by subrecipients of CDBG, and HOME funding used to acquire and/or renovate existing buildings for housing or to undertake residential and re-housing service activities through regular monitoring of those activities.

Actions planned to reduce the number of poverty-level families

The Urban County will work to reduce the number of poverty-level families by targeting CDBG, HOME, ESG and local funds to projects that will provide services to foster self-sufficiency, in conjunction with the provision of housing and shelter. The Commission will also continue to work closely with organizations that prioritize upstream investments.

Actions planned to develop institutional structure

The Sonoma County Community Development Commission will engage County Departments, cities, and community partners receiving CDBG, HOME, and ESG funding to carry out the activities in this plan during the next year. The anticipated outcome of this engagement will be a stronger social safety net and progress toward the alleviation of the causes and conditions of homelessness. Among the community partners are health, mental health, and service agencies who are key to fostering development of more supportive housing options throughout the County, and the nonprofit housing developers with whom they coordinate.

Under the direction of the Board of Supervisors, the Commission will spearhead initiatives to spur production of affordable rental housing by engaging developers and cities, collaborating with other County departments, updating funding policies, leveraging County-owned property, and proactively setting a production agenda.

The Sonoma County Housing Authority will strengthen the Housing Choice Voucher program's effectiveness by attracting new landlords, and by engaging participants, people on our wait lists, and community partners in a review of Housing Authority policies and practices and will build on existing relationships with local supportive service agencies to improve services offered to the Housing Authority's Family Self-Sufficiency participants. In July 2018, the Housing Authority hired a full-time Landlord Liaison who is dedicated to cultivating relationships with landlords who will provide additional housing opportunities for low-income families served through the various Housing Authority programs. The Housing Authority also received approval to use unspent administrative funds as a signing bonus

and risk mitigation fund for landlords who agree to take Housing Choice Voucher tenants.

Through the Homeless System Redesign and the reformation of the CoC Board in late 2020, the homeless system of care is continuing to increase efforts to coordinate funding decisions and policies. This effort increased collaboration among the County, City of Santa Rosa, City of Petaluma, the County departments of Health Services and Human Services, and virtually all housing and homeless service providers throughout Sonoma County. These will strengthen the homeless system of care's performance on System Performance Measurements such as reducing the length of homeless episodes, reducing returns to homelessness, increasing placements in permanent housing, and increasing participant incomes.

Specific goals for addressing and preventing homelessness in Sonoma County were outlined in the CoC's 10-Year Homeless Action Plan 2014 Update. The 2019 consolidated application for CoC funds also addressed the needs of homeless people in Sonoma County and can be accessed by contacting the Commission.

Finally, the Commission will strengthen internal systems to aid transparency, improve public engagement, and ensure maximum leverage of scarce public resources

Actions planned to enhance coordination between public and private housing and social service agencies

The Community Development Commission will strengthen relationships with public and private entities to further the objectives of this plan. The Commission has been and will continue improving its data systems in coordination with other service agencies, hospitals, and County departments in the intersection of healthcare and housing. The Commission will improve its engagement with all agencies, public and private, County departments, as well as the general public and encourage participation in all public meetings and forums it holds. As part of the effort to conduct an Assessment of Fair Housing, the Commission will lean on local groups and service providers to do robust outreach in the community.

The CoC Board in coordination with Commission staff will recommend improved standards for administering ESG funds under the HEARTH Act, will begin implementation of key recommendations made in an evaluation of the Coordinated Entry System, and will invite participation from all local agencies that serve Sonoma County's current and potential homeless population.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	1,040
5. The amount of income from float-funded activities	0
Total Program Income:	1,040

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No other forms of investment will be used in the second Year Action Plan.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

No homebuyer activities are being funded in the second Year Action Plan with HOME funds

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

All units that are being constructed or funded with HOME funds in the second Year Action Plan will be required to have restrictions on the deeds to indicate that units remain affordable for at least 55 years.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No HOME funds will be used for this purpose in the second Year Action Plan

Emergency Solutions Grant (ESG) Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Fiscal Year 2019-20 Home Sonoma County Consolidated Notice of Funding Availability (NOFA) Funding Policies. For FY 2021-22, the new CoC Board opted to renew current contracts for a second year with a reduction in funds available, rather than issue a new NOFA for a competitive funding process. Therefore, the FY 2019-20 policies are the most recent standards. In addition, in its role as CoC, Home Sonoma County has developed the standards for projects operating with ESG funding.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Sonoma County CoC's Coordinated Entry System (CES) provides entry into housing via numerous access points for individuals, youth, and families experiencing homelessness with a goal of providing participants with their choice of housing, shelter or services within 60 days of program enrollment. Since January 2018, Coordinated Entry has been the primary process for assessing severity of needs and ensuring that people experiencing homelessness can receive assistance in a timely fashion. Coordinated Entry covers the entire geography of the Sonoma County CoC and is the primary access point for referrals for permanent supportive housing and rapid re-housing as well as emergency crisis services/emergency shelter. The Commission provides funding to the Coordinated Entry Operator, Catholic Charities of the Diocese of Santa Rosa. Primary oversight of the Coordinated

Entry System is performed by the CoC Coordinated Entry Advisory Committee. The fully compliant Coordinated Entry Policies and Procedures adopted by the CoC Board in January 2018 are attached to this Action Plan.

In spring 2019 the Commission engaged Technical Assistance Collaborative, Inc., a HUD technical assistance provider, to perform an evaluation of the Coordinated Entry implementation. The consultants interviewed Commission and Coordinated Entry staff at great length and held more than a dozen focus groups to learn what is working well with Coordinated Entry, and what needs to be improved. The final report from Technical Assistance Collaborative was published on July 2. The report included several recommendations for needed improvements to strengthen CE infrastructure, and work has begun on implementing those improvements.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Sonoma County Community Development Commission allocates ESG funds (as well as local discretionary funds and a range of State funding) through a single competitive funding process governed by the Funding Policies. This allocation and contract administration function is staffed by the Commission's Ending Homelessness Team, which also provides staffing to the CoC and acts as HMIS Lead Agency. CoC consultation is achieved through a rating and ranking process for all applications that are eligible for ESG funds, conducted by the CoC Board's Evaluation Ad Hoc Group, and staffed by the Commission. HEARTH Act and Home Sonoma County policies, goals, and objectives—including standards for allocation of ESG funds—are fully integrated into the entitlement fund allocation process.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The County meets this requirement as two representatives on the CoC Board (governing body/CoC Board) are persons with recent lived experience of homelessness.

5. Describe performance standards for evaluating ESG.

The Sonoma County Community Development Commission staff follows the same procedures in monitoring and evaluating all homeless services awards, including those funded with ESG (and local CSF, LMIHAF and State ESG and other State funds). Minimally, all awardees are required to do a 'desktop monitoring' process (respond to an in-depth questionnaire); all ESG awardees are monitored on site each year. When ESG-funded programs are monitored, HEARTH Act performance measures and ESG policies and criteria are included in the overall monitoring. The FY 2019-20 Funding Policies for Homeless Services required scoring of projects based on performance in the

areas of temporary or permanent housing placement (for street outreach and day center projects), permanent housing placement (for shelter and rapid re-housing projects), and permanent housing retention (for permanent supportive housing projects). The policies set benchmarks for expected performance based on the 2016 System Performance Measures, broken out by program type as follows:

Street Outreach/Day Center/Coordinated Entry—placement in temporary or permanent housing: 35%

Emergency Shelters—exit to permanent housing: 21%

Rapid Re-Housing—exit to permanent housing: 90%

Permanent Supportive Housing—retention of permanent housing: 90%

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Sonoma County
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Fiscal Year 2022 One-Year Action Plan



Sonoma County Community Development Commission
Sonoma County Housing Authority
1440 Guerneville Road, Santa Rosa, CA 95403-4107

May 5, 2022

Annual Action Plan
FY 2022-2023

1

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Fiscal Year (FY) 2022-23 Action Plan is part of the 2020 Sonoma County Consolidated Plan covering FY's 2020-2021 through 2024-2025. The Consolidated Plan and Annual Action Plans are required by the U.S. Department of Housing and Urban Development (HUD) in order to receive certain federal housing, homelessness, and community development funds. Pursuant to a Joint Powers Agreement, the Sonoma County Community Development Commission (Commission) administers these funds on behalf of the HUD-designated Urban County entitlement jurisdiction, consisting of the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma. HUD funds received by the Urban County are Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and the Emergency Solutions Grant (ESG) program funds. The projects and programs using these funds will be carried out either directly by the Commission or through funding provided to other governmental or nonprofit agencies, to benefit low-income households by addressing the goals and objectives enumerated in the Consolidated Plan and summarized below.

The administration of and CDBG and HOME funds for projects are guided by funding policies set annually by the Commission with input from its advisory committees. The Commission uses a Community Development Committee (an appointed advisory committee made up of representatives from each supervisorial district, Housing Choice Voucher tenants, and a representative from the Human Services Department) and a Cities and Towns Advisory Committee, (an advisory committee made up of representatives from all Cities and Towns in the Urban County) to set these annual policies.

The administration of the CDBG homeless services set-aside, ESG and certain local and State funds for homeless services are guided by funding policies set annually by the Continuum of Care (CoC) Board, the county's homeless system of care.

Once recommendations are made for HOME, CDBG and ESG by the Community Development Committee, Cities and Towns Advisory Committee and CoC Board, these are incorporated into the annual Action Plan for adoption by the County Board of Supervisors.

For FY 2022-2023, the policies set aside funds for grant administration and planning and the balance of funds are awarded through competitive processes in which eligible projects and programs applied for funding to help meet the goals identified in the Consolidated Planning. The selection criteria for used to select eligible activities and programs for funding to meet Consolidated Plan goals were included in the - FY 2022-2023 CDBG and HOME Funding Policies that were published with the Notice of Funding Availability in December 2021.

The Commission's advisory committees made funding recommendations based on staff's review and analysis of the applicant projects and programs in two public meetings, including a public hearing held on April 20, 2022.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

This Action Plan, similar to previous Action Plans, organizes community priorities for the use of CDBG, HOME, and ESG funds by the Urban County by following the structure provided by HUD regulations, namely, by grouping said priorities into three categories: affordable housing, homelessness, and non-housing community development.

The Urban County's Consolidated Plan contains the following broad goals:

1. Affordable Housing: Increase and preserve the housing stock that is affordable, safe, and accessible for low, very low, and extremely-low income families and individuals, including those with special needs and those who are homeless or at imminent risk of homelessness.
2. Homelessness: Promote effective and proven strategies for homelessness prevention and intervention countywide.
3. Non-Housing Community Development: a) Assist in creating and/or replacing infrastructure systems and public facilities that meet the needs of lower-income people, people with disabilities, and other special needs subpopulations county-wide; b) Promote the well-being and economic integration of lower-income persons through non-housing services, self-sufficiency programs, job training, and economic development assistance; and c) Promote Fair Housing by investing in services which assist low-income tenants with fair housing complaints, reasonable accommodations and eviction defense, each of which enables residents to remain in their home or extend their period of housing.

Each of these priorities has equity as its underlying foundation by ensuring that historically marginalized or disadvantaged communities have equal and fair access to the services provided through HUD funding.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Sonoma County has a long-standing history of being a very expensive housing market, especially in comparison to median household incomes. According to *Out of Reach 2021*, a publication of the National Low-Income Housing Coalition, the average wage for Sonoma County renters in 2021 was \$20.05 and the "housing wage" necessary to afford the fair market rent for a one-bedroom apartment is \$31.06, indicating an overall wage shortfall of 35%. The gap rises to 48% for two-bedroom apartments, which require a wage of \$39.03 per hour. A report released by Apartment List in September 2018 found that over half of Sonoma County residents are cost-burdened (paying more than 30% of income on rent), and nearly a third are severely cost-burdened (paying more than 50% of their income on rent). Additionally, catastrophic wildfires in October 2017 and October 2019 and flooding in February 2019 destroyed or rendered uninhabitable nearly 6,000 homes in Sonoma County. Furthermore, the global pandemic, COVID-19, which was declared an emergency in March 2020, spurred the mass shutdown of businesses and subsequent layoffs Countywide. Though the Governor's office and County implemented moratoriums on evictions for renters who were suddenly unable to pay rent due to loss of income, County officials are seeking ways to keep renters who are in volatile economic positions from entering homelessness once the moratorium is lifted. Thus, even though earlier Consolidated Plans for the Urban County prioritized rental housing affordability, rental housing affordability remains a top priority.

Due mainly to the disparity in housing rents versus household incomes, Sonoma County has a high rate of homelessness. In 2020, the Annual Point-in-Time Homeless Census & Survey found that approximately 2,745 residents are experiencing homelessness at any given time. Though this is a decrease of 7.7% from 2019, the rate of homelessness remains significantly higher than many similarly-sized California counties and most of the nation. The funding of homeless intervention and prevention programs make up a large percentage of the "portfolio" of past performance and remains a top objective. Due to the COVID-19 pandemic, the scheduled biennial Homeless Count was not conducted in 2021 due to safety concerns, but was conducted in March, 2022 with results to be published in the late summer or early fall of 2022.

In the past, the Urban County members have prioritized the use of CDBG funds for Americans with Disabilities Act (ADA) retrofit projects, mainly the removal of architectural barriers identified in existing public buildings and infrastructure. This use of CDBG funds is highly effective in these projects because ADA retrofit projects can generally be successfully scaled

and/or phased based on funding availability. During the last Consolidated Plan period, July 2015 to June 2020, ADA project funds in an aggregate amount of nearly \$3.5 million were awarded to 36 different projects sponsored by the eight participating jurisdictions. These projects include sidewalk "curb cuts," and other path-of-travel retrofit projects along roadsides; library, park, and community center restroom ADA renovations; creation of ADA compliant bike paths; and community facility ADA retrofit upgrades. Additionally, CDBG dollars financed rehabilitation or accessibility modifications for over 250 low-income and senior homeowners and renters. These projects are essential to the community's residents who are lower income, elderly or have disabilities, and therefore remain a high priority for the use of CDBG funds during the 2020-2025 Consolidated Plan period.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen input into this Action Plan was sought primarily through multiple virtual public hearings, engagement with cities and towns on jurisdictional needs and community outreach to needs. The citizen participation process was adapted primarily to a virtual meeting format when a federal emergency was declared due to the COVID-19 pandemic. Notices of public meetings and public hearings were published to encourage community participation in the development of the Action Plan. Additionally, a draft of the Action Plan was made available from April 1, 2022, through May 1, 2022 for a 30-day public comment period. The draft was available on the Sonoma County Community Development Commission website and hard copies were available by request.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public input received was focused on affordable rental housing, fair housing issues, homelessness, protected classes and the disproportionate affect that the pandemic has on them and the relationship between of these issues combined. Therefore, these are areas of prioritization that reflect public feedback.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were accepted.

7. Summary

Rental housing affordability, fair housing, and homelessness remain top priorities. The ongoing disaster response and recovery efforts from the 2017 and 2019 fires, a major flood and the COVID-19 pandemic, all in the last five years, have had a substantial impact on housing stability across the County, but has had particularly burdensome impacts for lower income renters and protected class populations. The public input to prioritize stable and equitable housing is more intense and broad-based than was voiced in the development phase of earlier Consolidated Plans.

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PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Sonoma County	Community Development Commission
HOME Administrator	Sonoma County	Community Development Commission
ESG Administrator	Sonoma County	Community Development Commission

Table 1 – Responsible Agencies

Narrative (optional)

The Sonoma County Community Development Commission is the administrative agency charged with administering CDBG, HOME and ESG funding on behalf of the Urban County, a Joint Powers Agreement partnership consisting of the County of Sonoma, the Town of Windsor and the cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The Sonoma County Community Development Commission houses the Sonoma County Housing Authority and administers all affordable housing finance programs for the unincorporated County of Sonoma. The Commission also hosts and staffs the county's CoC and is the largest funder of homeless services countywide. The Commission actively participates in various collective action and community initiatives addressing the needs of lower-income members of the community, including, but not limited to, ACCESS Sonoma, the Renewal Enterprise District (RED), Health Action, and Upstream Investments. Because of these existing roles, the Commission is well-positioned to consult with private and public agencies about Consolidated Plan matters since the appropriate agency-to-agency relations are already in place.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The Sonoma County Community Development Commission is a County government agency, and its staff has regular and ongoing contact with County government departments and agencies including, but not limited to, the Department of Health Services (DHS) and the Human Services Department; Regional Parks; Permit Sonoma; and the Office of Recovery and Resilience. The Sonoma County Housing Authority is a component organization of the Commission. The Commission has regular and ongoing contact with the City of Santa Rosa Economic Development and Housing Department and Housing Authority. The CoC Board, staffed by the Commission, includes dedicated seats for the County of Sonoma's Board of Supervisors, as well as one seat each for a member of the Santa Rosa City Council and the Petaluma City Council. The Commission conducts annual competitions for federal and local public services funding through Notices of Funding Availability and in doing so, establishes ongoing relationships with a large percentage of community-based non-profit agencies that provide homelessness, affordable housing, and related services. The County of Sonoma's planning, building, zoning and land use department is known as Permit Sonoma. The Commission has regular contact with Permit Sonoma to enhance affordable housing program coordination. One of the members of the Commission's advisory committee (the Community Development Committee) is the Assistant Director of the Human Services Department. The Commission created and launched the RED which now operates independently as a Joint-governmental organization between the City of Santa Rosa, the County of Sonoma, and private developers. The RED works across jurisdictions to market and attract developers, to blend

private financing and public funds, to leverage state and federal grant funds and to facilitate creation of housing that meets established public policy goals for increased density, access to transit, protection of open space and community separators and improving energy efficiency, climate resilience and affordability. The Commission also works in close coordination with staff from DHS on building internal infrastructure and coordinating efforts around joint housing and health interventions for the County's homeless population.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

In November 2020, the County's CoC, Home Sonoma County, reverted to its previous CoC Board structure due to an error in reorganization in 2018. The Sonoma County Community Development Commission leads, hosts and staffs the 18-member CoC Board and fully integrates that role with other related Commission roles such as funder of homeless, housing, and community services, Homeless Management Information Systems (HMIS) administrator, and Coordinated Entry. The CoC Board provides structure to the homeless system of care in order to make policy decisions and measure results for ending homelessness throughout the county. The meetings of the CoC Board and its Committees and working groups help forge new connections and working relationships with many participants as well as responding to the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requirements.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Sonoma County Community Development Commission's Ending Homelessness division is responsible for ESG program administration as well as for hosting and staffing Home Sonoma County and coordinating the County HMIS. Thus, funding prioritization, policy and standards development, and funding administration are fully integrated. Also, through its representation on the CoC Board and interjurisdictional staff consultation, the Commission coordinates with the cities of Santa Rosa and Petaluma in allocating ESG funding in those cities, which lie within the geography of Home Sonoma County/the CoC. The Commission's Home Sonoma County staff regularly coordinate with both staff and civic leaders in the cities of Santa Rosa and Petaluma, the State Department of Housing and Community Development, and the State Business, Consumer Services and Housing Agency—not to mention with elected leaders of the

County of Sonoma—through study sessions, formal presentations, and informal consultations on implementation of their Consolidated Plans and related matters of concern.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

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Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Santa Rosa
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited the city to provide Plan input through public meetings or direct communication. The Commission coordinates regularly with the City on the administration of housing programs and homeless services. The anticipated outcome of the consultation was to ensure continued coordination and to complement the City's 5-Year Consolidated Plan
2	Agency/Group/Organization	City of Cloverdale
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
3	Agency/Group/Organization	City of Cotati
	Agency/Group/Organization Type	Other government - Local

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
4	Agency/Group/Organization	City of Healdsburg
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
5	Agency/Group/Organization	City of Rohnert Park
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.

6	Agency/Group/Organization	City of Sonoma
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
7	Agency/Group/Organization	City of Sebastopol
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
8	Agency/Group/Organization	Town of Windsor
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact as a member of the Urban County Joint Powers Agreement partnership.
9	Agency/Group/Organization	City of Petaluma
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. The Commission coordinates regularly with the City on the administration of housing programs and homeless services. The anticipated outcome of the consultation was to ensure continued coordination and to complement the City's 5-Year Consolidated Plan.
10	Agency/Group/Organization	Fair Housing Advocates of Northern California
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Fair Housing Advocates of Northern California (FHANC) is the CDBG funded Fair Housing provider for the Urban County. The agency has provided training on Fair Housing. FHANC's primary services involve fair housing counseling, investigation, and enforcement of fair housing for Sonoma County residents
11	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. Agency is recognized leader in providing homeless services in the Urban County. The anticipated outcome of the consultation was improved coordination with a regional homeless services provider.
12	Agency/Group/Organization	Committee on the Shelterless
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. Agency is recognized leader in providing homeless services in the Urban County. The anticipated outcome of the consultation was improved coordination with a regional homeless services provider.

Identify any Agency Types not consulted and provide rationale for not consulting

All groups were either consulted or invited to participate in the Plan process. There was no decision to exclude any group.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Sonoma County Community Development Commission	The County's Continuum of Care, is staffed by the Community Development Commission. Staff work to ensure that plans and goals are consistent and complementary.
2020 Assessment of Fair Housing	Sonoma County Community Development Commission	The Assessment of Fair Housing illuminates where discrimination and barriers to accessing housing exist for protected class populations, and serves as the framework for the Community Development Commissions inclusion of equity in all policy examination.
Sonoma County Recovery Framework	Sonoma County Community Development Commission County Office of Recovery and Resiliency	The Framework was prepared by the County's Office of Recovery and Resiliency in collaboration with other County departments and agencies, cities and other jurisdictions, nonprofits, and community stakeholders in response to the 2017 Sonoma Complex Wildfires. The Framework is a culmination of input provided by community members and stakeholders during an extensive community engagement period to gather information on needs and action items for five key strategic areas: Community preparedness and infrastructure; Housing; Economy; Safety Net Services; and Natural Resources

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Citizen participation outreach includes public meetings of the Community Development Committee, Cities & Towns Advisory Committee, the CoC Board, Technical Advisory Committee, and sub-committee working groups, public notices, email "blasts," and the use of the CDC website, which is accessed by numerous community partners. The Community was also widely engaged following the 2017 and 2019 fires in Sonoma County and during surveying and focus group activities as part of the 2020 Assessment of Fair Housing process. These efforts were especially fruitful and generated much comment on the escalating cost of rental housing, the shortage of housing supply, the local homelessness situation, disparate impacts of disasters, fair housing concerns and the effects that the pandemic has had on protected classes, and other factors contributing to housing insecurity and homelessness in the County.

Two FY 2022-2023 CDBG and HOME Funding Policies development meetings were held on September 15, 2021 and November 17, 2021. These public meetings were held by the Community Development Committee and the Cities and Towns Advisory Committee to review the Consolidated Plan goals, CDBG and HOME requirements and Urban County needs. The committees held an in-depth discussion and one public comment was received during these meetings which were attended by approximately eight attendees at the September meeting and 22 attendees at the November meeting.

From April 1, 2022, through May 1, 2022, the draft Annual Action Plan was made available to the public. A notice was published in the local newspaper to announce its availability and the draft Annual Action Plan was posted on the Commission's website. An email was sent in both English and Spanish through the county's interested parties email list informing them of where the plan can be viewed online. The draft Action Plan was published when Commission offices were still operating in a hybrid remote telework model due to the global pandemic, and therefore physical copies were available by request. Additionally, a public meeting on the projects recommended for grant funding was held on Wednesday, March 16, 2022 and a subsequent public hearing to take comments on the draft Action Plan will be held on April 20, 2022. All meetings are held virtually to prevent the spread of COVID-19. There were

twenty-three attendees at the March 16th meeting and several of the applicants made public comments in support of their funding proposals.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Members of the public attended the virtual meeting	6 attendees and applicants spoke in support of the projects requesting funding.	All comments were accepted	https://sonomacounty.ca.gov/community-development-committee-meeting-2022-03-16
2	Newspaper Ads	Non-targeted/broad community (English and Spanish)				
3	Internet	Non-targeted/broad community (English and Spanish)				

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Email List Serve	Non-targeted/broad community (English and Spanish)				

Table 4 – Citizen Participation Outreach

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Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The amount of CDBG, HOME, and ESG funds expected annually is approximately \$2.88 million. Based on consistent historical trends, these funds are expected to leverage many times this amount in other, non-federal funds, each year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,856,844	TBD	\$520,000	2,376,844	5,760,000	CDBG will be used for housing and capital projects. ADA retrofit and other public facility/improvement projects and non-housing services

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public - Federal	Acquisition Multifamily rental new construction Multifamily rental rehab TBRA	869,602	TBD	536,605	1,188,806	1,739,204	HOME funds will be used to finance affordable rental housing development and preservation, and to provide tenant-based rental assistance
ESG	Public - Federal	Overnight shelter Rapid re-housing Rental Assistance Services Transitional housing	160,798	0	0	160,798	321,596	ESG funds will be used almost entirely for rapid re-housing programs for homeless persons. A small portion of funds may continue to be used to support shelter operations.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Competitive McKinney-Vento Homeless Assistance Act	Public - Federal	Admin and Planning Rapid re-housing (rental assistance) Other	4,162,516	0	0	4,162,516	8,325,032	CoC funds will be used for permanent supportive housing projects that serve homeless persons, chronically homeless populations, and a small amount of rapid re-housing funding for victims of domestic violence. A small portion of funds will continue to be used to support mandated system infrastructure costs such as HMIS data systems, Coordinated Entry and CoC planning and management.
Section 8	Public - Federal	Rental Assistance	38,113,294 (estimated)	0	0	38,113,294	107,855,102 (estimated)	Section 8 funds are used for tenant based and project based vouchers and are administered by the Sonoma County Housing Authority.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Generally speaking, based on consistent historical trends for nearly all affordable housing projects, HOME and CDBG funds can be expected to leverage 3-30 times the amount of funding making up a project's capital development budget. The funding leveraged

includes tax credit equity investment, local affordable housing funds, and State of California housing program funds. For public services, CDBG and ESG typically leverage, in aggregate, similar ratios. These leveraged operational funds include local government funds, private and foundation donated funds, federal CoC funds, and state ESG program funds, and significant new State funding initiatives that began in 2018. CDBG-funded fair housing and ADA retrofit projects tends to leverage less, in practice, and in some instances, CDBG is the sole source of funding. The funding application process utilized by the Commission requests applicants describe and quantify leveraged funding and the funding policies encourage leveraging by making it an evaluation criterion. Through the funding contract administration process, all awardees are required to rigorously document the amounts and sources of leveraged funds.

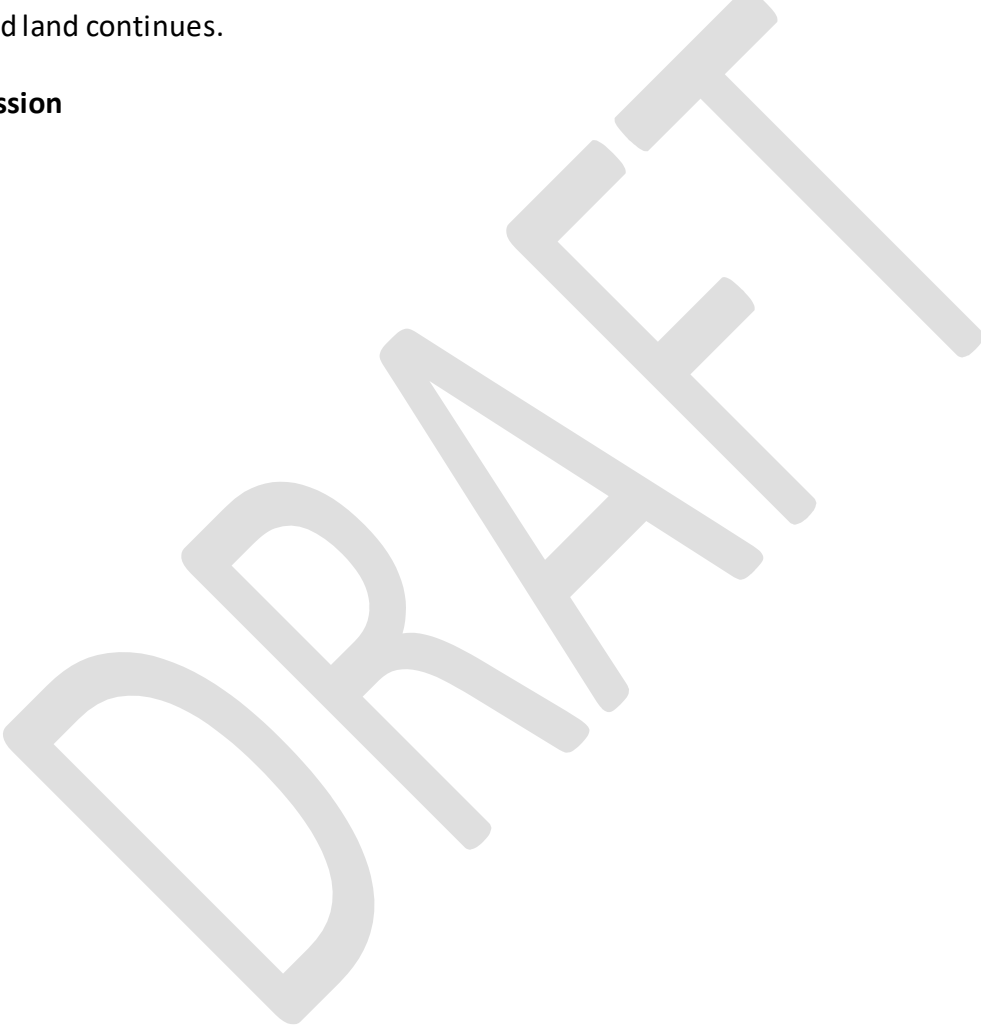
HOME Match Requirement: The HOME regulations require a 25% match for all HOME funds used, excluding HOME funds used for CHDO operational expense, and general program administration. The Sonoma County Community Development Commission estimates that the leveraged funds will generate match sufficient to cover the match obligation for the HOME loans to rental housing projects. Any residual match will be credited against the Tenant Based Rental Assistance (TBRA) program match obligation. Any balance of the TBRA match obligation will be drawn from the previously accumulated match that the Commission has earned. The Commission will calculate the match value of the property tax waiver that the projects receive when the rental housing projects become operational and add the match value to the Commission's match tracking system.

ESG Match Requirement: The ESG regulations require grantees to provide a 100% match for all ESG funds used. Any projects to be funded through the Commission must document sufficient match through funds from other sources including but not limited to contributions, client fees, incidental program revenue and rent, foundation grants.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In general, and historically, local government has frequently provided land for many affordable housing projects. The Commission currently owns a 6-acre parcel in the former Roseland Redevelopment Area, and another 7-acre property purchased in 2016 which served as the office location of the Sonoma Water Agency. The County’s department of General Services maintains a list of underutilized County properties as the discussion around utilizing publicly owned land continues.

Discussion



Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2022	2023	Affordable Housing	Urban County	Affordable Housing	<p style="text-align: right;">CDBG: \$1,411,476</p> <p style="text-align: right;">HOME: \$ 1,188,806</p> <p style="text-align: right;">Section 8: \$38,113,294 (estimated)</p>	<p>a) Predevelopment expenses for 58 very low- and low-income rental units to be constructed. b) 60 very low- and low-income homeowner housing units to be rehabilitated. Tenant-based rental assistance / Rapid Rehousing: 3,275 (estimated) Households Assisted</p>
2	Homelessness	2022	2023	Homeless		Homelessness	<p>ESG: \$160,798</p> <p>Competitive McKinney-Vento Homeless Assistance Act: \$4,162,516</p>	<p>Rapid Rehousing: 300 Households Assisted</p> <p>Homeless Persons Overnight Shelter: 750 Persons Assisted</p>

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Non-Housing Community Development	2022	2023	Non-Homeless Special Needs Non-Housing Community Development		Non-Housing Community Development	CDBG: \$315,472	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2949 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	
2	Goal Name	Homelessness
	Goal Description	
3	Goal Name	Non-Housing Community Development
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

In FY 2022-2023, Sonoma County estimates it will receive \$1,856,844 in CDBG funds. CDBG funds will be used for affordable housing activities, fair housing services, public improvements, and public facilities, all of which must be awarded for projects and programs that affirmatively further fair housing. Federal regulations impose a 15 percent maximum cap on funding to be expended for public service activities, which are used by Sonoma County to support Fair Housing services. Administrative costs are limited to 20 percent of the total CDBG grant allocation and 20 percent of program income received.

In FY 2022-2023, Sonoma County estimates it will receive \$869,602 in HOME funds. HOME funds will be used to support affordable rental housing production, and tenant-based rental assistance. Federal regulations require a minimum of 15 percent of each year's HOME grant allocation to be set-aside for Community Housing Development Organizations (CHDO's). No CHDO applications were received through the NOFA funding cycle, however, the CHDO funds will be made available through a mid-year NOFA. At least one local CHDO has expressed their intent to apply for these funds for an affordable housing development.

In FY 2022-2023, Sonoma County estimates it will receive \$160,798 in ESG funds. This year, one homeless shelter proposal was recommended for funding.

Projects

#	Project Name
1	CDBG - General Administration
2	ESG Sonoma County (HESG)
3	CDBG and HOME Acquisition, Disposition and Predevelopment
4	CDBG and HOME Affordable Housing
5	CDBG Public Facilities and Infrastructure Improvements
6	CDBG Fair Housing and Housing Justice Program
7	HOME Administration

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The above-listed set of projects using CDBG, HOME and ESG will be used to meet the five-year 2020-

2025 Consolidated Plan goals.

The projects will meet the policy goals approved by the CoC Board and will comply with the regulatory requirements, especially meeting defined objectives of each funding source and timely spending of awarded funds. Sonoma County plans to issue another NOFA for FY 2022-2023 CDBG and HOME funds and will also include any program income available. Applications for eligible activities will be recommended to the committees for an Action Plan amendment that would allow more funding to be awarded during the Action Plan program year.

DRAFT

AP-38 Project Summary
Project Summary Information

DRAFT

1	Project Name	CDBG - General Administration
	Target Area	Urban County
	Goals Supported	Affordable Housing Non-Housing Community Development
	Needs Addressed	Affordable Housing Non-Housing Community Development
	Funding	CDBG: \$371,368
	Description	CDBG grant planning and administration activities.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Urban County
	Planned Activities	CDBG grant planning and administration activities.
2	Project Name	ESG 22 Sonoma County
	Target Area	?
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$160,798
	Description	\$148,739 will be awarded to Community Based Organizations that provide rapid rehousing and shelter services and \$12,060 will go to ESG Administration
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	756 Individuals supported by beds at the shelter
	Location Description	Countywide
	Planned Activities	Homeless shelter and rapid rehousing
3	Project Name	CDBG and HOME Acquisition, Disposition and Predevelopment
	Target Area	Countywide
	Goals Supported	Affordable Housing

	Needs Addressed	Affordable Housing
	Funding	CDBG: \$866,476
	Description	The County will utilize CDBG and HOME funds for affordable rental housing predevelopment and construction activities.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	58 very low- and low-income households
	Location Description	Urban County
	Planned Activities	Funds will be awarded for Predevelopment expenses for the development of 58 units of affordable rental housing.
4	Project Name	2022 Affordable Housing
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$900,000 (Burbank Housing \$400,000 and TBRA \$500,000) CDBG: \$545,000 (Housing Rehab \$500,000 and DSLC \$45,000)
	Description	CDBG funds will be used to support affordable housing activities, including housing rehabilitation and housing accessibility modifications for disabled households. HOME Funds will be used to create affordable housing opportunities through construction of new affordable rental units and by providing Tenant-Based Rental Assistance for low-income individuals.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	140 households will receive Tenant Based Rental Assistance 58 households will have access to new affordable housing 60 low/mod residents will receive housing rehabilitation and accessibility improvements
	Location Description	Urban County
	Planned Activities	Tenant Based Rental Assistance, Housing Rehabilitation, affordable rental housing construction
	Project Name	CDBG 2022 Public Facilities and Infrastructure Improvements

5	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Infrastructure and Public Facilities
	Funding	CDBG: \$315,000 (Sebastopol ADA \$146,000 and Sweetwater Springs Water Line \$169,000)
	Description	CDBG funds will be used to improve public facilities and public infrastructure to meet the demands of citizens in low- and moderate income (LMI) areas or to meet the needs of Low Moderate-Income Clientele (LMC) in the Urban County. This will include ADA accessibility improvements and infrastructure updates.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2,949 Low Income Individuals
	Location Description	Urban County
	Planned Activities	Water system improvements to increase water pressure and install fire hydrants in underserved areas, and ADA improvements for recreational/municipal facilities and sidewalks in low-moderate income areas
6	Project Name	CDBG 2022 Fair Housing and Housing Justice Program
	Target Area	Urban County
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$278,526 (Fair Housing Advocates of NC \$84,526 and Legal Aid of SC \$194,000)
	Description	Funds will be used to support a Fair Housing and legal services to provide eviction defense for residents and housing stabilization.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	750 Households, 1100 people will be assisted
	Location Description	Urban County

	Planned Activities	
7	Project Name	2022 HOME Administration
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$86,960
	Description	Administration of the 2022 HOME Program
	Target Date	6/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Urban County
	Planned Activities	Administration of the HOME program.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

This FY 2022-2023 Action Plan, Year 3, encompasses activities undertaken by the County of Sonoma, and within the seven municipalities comprising the HUD entitlement Urban County: Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor. Sonoma County does not dedicate funds to target areas.

Geographic Distribution

Target Area	Percentage of Funds
N/A	N/A

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Urban County jurisdictions allocate CDBG and HOME funds for eligible projects and activities. Particular attention has been paid to tracking the geographic distribution of these dollars within the Urban County areas, and in the 2020 Consolidated Plan, a focus on communities that have experienced historic disinvestment of public resources was prioritized. The geographic distribution of CDBG and HOME funds is included in the analysis of eligible applications and projects when they are considered for funding recommendations.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Below are the anticipated numbers of households that will be supported through the FY 2022-2023 Action Plan.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	253
Special-Needs	5
Total	258

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	140
The Production of New Units	58
Rehab of Existing Units	60
Acquisition of Existing Units	0
Total	258

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Burbank Housing Development Corporation plans to build a 100% affordable 58-unit family rental housing project in Healdsburg. All of the units will be restricted to extremely low, very low- and low-income households.

Disability Services and Legal Center (DSLCL) will operate a Housing Access Modification program installing ADA upgrades to 5-6 homes.

The Sonoma County Housing Authority will provide tenant-based rental assistance to 140 vulnerable households.

The Commission’s Housing Rehabilitation program will complete rehabilitation and earthquake retrofits to at least 55 homes for low-income seniors and residents with disabilities.

AP-60 Public Housing – 91.220(h)

Introduction

Sonoma County's 2011 *Analysis of Impediments to Fair Housing Choice* cited the lack of affordable housing as a barrier for low-income persons to find adequate housing. The shortage of affordable housing has only become worse since the October 2017 Sonoma Complex Fire, the 2019 Tubbs Fire and the start of the COVID-19 pandemic in 2020. While the Sonoma County Housing Authority (Housing Authority) has no public housing, it will continue to use its Housing Choice Voucher Program to increase access to affordable housing for lower income households. The Housing Authority will continue to pursue all new funding opportunities that become available.

Actions planned during the next year to address the needs to public housing

The Sonoma County Housing Authority does not own or operate any public housing. During the next year, the Housing Authority and Commission will continue to address the priority housing needs discussed in the 2020 Consolidated Plan,

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

The Sonoma County Housing Authority does not own or operate any public housing. The Sonoma County Community Development Committee (the advisory board to the Sonoma County Community Development Commission and the Sonoma County Housing Authority) includes two Section 8 participants and serves as the Housing Authority's resident advisory board.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

HUD has designated the Sonoma County Housing Authority as a "high performer" agency for the past 20 years consecutively.

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Sonoma County Community Development Commission combines ESG, California Emergency Solutions and Housing (CESH), \$4.4 million in State Homeless Housing Assistance and Prevention (HHAP) 3 program funds and other State and local funding allocations into a consolidated funding process for Homeless Services programs. Homeless services funding priorities focus on interventions that demonstrably impact the CoC's system-wide Performance Measures.

The Commission staffs the CoC Board and its working groups, which comprise the local CoC. In addition to the funding cycle described above, another \$5 million annually in CoC funding is used to address homelessness. As Lead Agency for the CoC Board and the only ESG entitlement jurisdiction in Sonoma County, the Commission has entered into an agreement with the California Department of Housing and Community Development to act as Administrative Entity for a \$213,044 allocation of the balance of State ESG funds (for the non-ESG entitlement jurisdictions of Santa Rosa and Petaluma) plus CESH, a State-funded program with eligible uses similar to ESG, currently estimated at \$457,360 for FY 2022-23.

In addition, a private donor contributes \$600,000 annually to a homeless prevention fund operated by an awardee; that single donor has contributed over \$7 million to date.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Since 2015, the Commission has contracted with Catholic Charities to operate a Homeless Outreach Services Team (HOST) street outreach program to engage unsheltered persons living along waterways and in parks, assess their needs with an evidence-based assessment tool, and place people into housing as quickly as possible. As the system of care shifted its focus to the most vulnerable unsheltered persons, especially with the advent of Coordinated Entry throughout the county geography, a County Integrated Multi-Disciplinary Team (now rebranded as HEART) has significantly increased county-wide engagement efforts to difficult to serve populations. Additional street outreach teams with local knowledge have been launched in each region of the county, and all outreach teams work collaboratively. Street outreach teams work closely with the Coordinated Entry System, which provides standardized assessment and housing placement for all homeless populations.

In FY 2021-22, \$325,651 in combined State and local funds have been added to the HOST project to enable the HOST Team to reach 700 unsheltered persons throughout the Urban County, including underserved areas such as the Sonoma Valley; outreach to transition age youth has been expanded to serve up to 500 unsheltered youth with \$211,542 in combined State and local funds. In addition to these investments, a combined \$200,000 has been allocated to targeted outreach activities in rural areas of

the Urban County.

Addressing the emergency shelter and transitional housing needs of homeless persons

The focus of Sonoma County's emergency shelter and transitional housing programs is establishing safety through trauma-informed care, to stabilize and more quickly house participants. In addition, ESG, local, and State Homeless Emergency Aid Program (HEAP) funds are allocated to support 370 children and their families at Catholic Charities' 138-bed Family Support Center. In FY 2021-22, the Commission will use local and State funds to support 500 single adults at Catholic Charities' 213-bed Samuel Jones Hall, 91 women and children at Community Action Partnership's 22-bed Sloan Women's Shelter; 33 youth at Social Advocates for Youth's (SAY) 12-bed Transitional-Aged Youth (TAY) Emergency Shelter and another 81 youth at SAY's Dream Center Emergency Shelter. In addition, the Commission will use local and State HEAP funds to support winter shelter expansions offered by Catholic Charities' Family Support Center, Committee on the Shelterless (COTS), Sonoma Overnight Support (in the Sonoma Valley), SAY, and West County Community Services in unincorporated Guerneville—all of which serve the Urban County. Lastly in FY 2019-20, the County of Sonoma invested new State funding in operation of an "indoor-outdoor" shelter serving 60 vulnerable individuals in tiny shelters on the grounds of a former juvenile justice facility, to mitigate the impact of unsheltered persons with significant service needs congregating in County parks. While the County undertook this effort in the midst of an emergency declaration, operations have been determined necessary on an ongoing and indefinite timeline.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Permanent supportive housing is the key service intervention for chronically homeless persons and for ensuring they do not become homeless again. Permanent supportive housing is also the Sonoma County system of care's greatest need, and therefore the homeless services competitive funding cycle prioritizes permanent supportive housing capital development, services, and operations above all other uses, as long as these are eligible expenses. In FY 2021-22, the Community Development Commission allocated ESG- Coronavirus (ESG-CV) dollars and State ESG dollars, with other local and State funds, for two Rapid Re-Housing projects (operated by Interfaith Shelter Network and Catholic Charities) that will serve up to 143 households. Local and State funds which will support Rapid Re-Housing assistance for another 270 households throughout the Urban County. Local and State HHAP funds for the cost of services and housing operations at eight permanent supportive housing projects serving 310 persons in Cotati, Cloverdale, Rohnert Park, Santa Rosa, and Sebastopol. Funding for supportive services and housing operations provided by Catholic Charities, Community Support Network, COTS, Reach for Home,

and West County Community Services. In addition, the Commission acts as a collaborative applicant for \$3.9 million in CoC funding, which supports permanent supportive housing for approximately 260 formerly chronically homeless persons throughout Sonoma County.

Through partnerships with Partnership HealthPlan of California, Kaiser and St Joseph Health, 11 new permanent supportive housing beds have become available for the chronic homeless who are super utilizers of the emergency room with complex medical conditions.

In March 2018 the Sonoma County Housing Authority instituted a referral program providing streamlined accessibility to households registered with Sonoma County Coordinated Entry. Households referred by Coordinated Entry for this program are provided an opportunity to receive a Housing Choice Voucher.

In July 2018 the Housing Authority instituted a move-on program to free up beds in permanent supportive housing facilities. The people who are “moved-on” are provided with a Housing Choice Voucher, freeing up a PSH bed for another chronically homeless individual or family in need of supportive services.

Finally, the Housing Authority initiated a new CoC funded permanent supportive housing program targeting homeless individuals with chronic health conditions

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Commission works with Coordinated Entry to provide linkage for individuals existing health care systems via staff co-located at hospitals as well as a weekly Transitions of Care with hospital and clinic leads that emphasizes placement of individuals exiting hospitals, particularly at risk of COVID complications. For mental health facilities, the Commission works closely with Sonoma County's Health Services Department and its Behavioral Health Division, particularly the Crisis Stabilization Unit. Correction partners include the Sonoma County Department of Probation and its primary contractor, Interfaith Shelter Network, who provide linkages to transitional housing for justice involved individuals for placement prior to becoming homelessness. Youth providers, including Social Advocates for Youth, provide homelessness prevention services and work closely with Commission staff to prevent transition age youth

from becoming homeless.

Public and private agencies – such as the Department of Health Services and the Department of Human Services and private healthcare also work closely with the Commission. Most notably, Partnership Health Plan of California partners with the Commission to provide over \$5 million in funds for local nonprofits for both homeless services and capital development for those receiving health benefits. The Commission’s Ending Homelessness Manager works closely with the County Foster Youth Liaison to provide services for youth.

Discussion

The County of Sonoma endeavors to enhance the capacity of County programs and community systems to more effectively meet the changing needs of individuals, families, and communities in Sonoma County by following the concept of *“upstream investments.”* Upstream investments are defined as opportunities to provide prevention or intervention assistance before more expensive consequences develop. The Commission and Home Sonoma County are supporting this concept by prioritizing homeless and supportive housing programs and expanding the use of evidence-based practices with tools such as the Housing First Self-Assessment Tool.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Sonoma County's 2011 Analysis of Impediments to Fair Housing Choice cited the lack of affordable housing stock as a barrier to affordable housing for residents living in Sonoma County. The Commission will continue to use its CDBG and HOME funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons.

In a 2020 study, the California Housing Partnership Corporation found that 77% of Sonoma County's lowest-income renters are severely rent burdened, leaving little left for food, transportation, health or other essentials. The poverty rate in Sonoma County rises from 10.3% to 17.9% when adjusted for housing costs and social benefits. The California Housing Partnership Corporation estimates that Sonoma County needs 16,825 new affordable rental homes to meet current demand. This number represents the approximate number of renter households currently living in overcrowded conditions or facing severe housing cost burdens.

As mentioned in the Market Analysis of the Consolidated Plan, the State of California requires each jurisdiction's General Plan Housing Element to identify constraints to housing development and to identify measures the jurisdiction will undertake to ameliorate those constraints. SP- 55 of the Consolidated Plan provides a list of the type of measures likely to be undertaken by one or more of the individual jurisdictions. Because the Urban County is comprised of eight different jurisdictions, seven municipalities plus the County of Sonoma, it is not possible to identify the cumulative measures planned by the eight jurisdictions for FY 2022-2023. However, each jurisdiction has a Housing Element that identifies its various programs and actions steps specific to their communities. The websites for these Housing Elements are listed in MA-40 and SP-55 of the 2020-2025 Consolidated Plan.

In 2021, Sonoma County and each of the seven cities in the Urban County initiated the development of their new Housing Elements. This multiyear process will conclude in 2023 and will generate new Housing Elements with new housing goals based on the Regional Housing Needs Allocation. The California Department of Housing and Community Development added a new requirement to include an Affirmatively Furthering Fair Housing (AFFH) analysis this cycle. The Commission in partnership with the cities of Santa Rosa and Petaluma is currently working to update the Analysis of Impediments/Assessment of Fair Housing in conjunction with the AFFH process that evaluates barriers to housing opportunities and affordable housing for

marginalized communities countywide.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The Commission ensures compliance with the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 for all new housing construction projects. This includes that, at a minimum, five percent of the total dwelling units or at least one unit in a multifamily housing project, whichever is greater, shall be made accessible for persons with mobility impairments. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in § 8.32 is accessible for purposes of this section. An additional two percent of the units (but not less than one unit) in such a project shall be accessible for persons with hearing or vision impairments.

In addition, the Commission requires all projects receiving HOME funds to adhere to the requirements of 24 CFR 92.351 and to follow its affirmative marketing procedures and requirements for rental projects containing 5 or more HOME-assisted housing units. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status or disability.

Furthermore, Permit Sonoma, uses a number of tools to remove barriers to affordable housing: A Reasonable Accommodation Ordinance, in place for more than 10 years, allows exceptions and modifications to standards and policies for siting, development, and use of housing that gives persons with disabilities equal access to housing of their choice; local Density Bonuses for affordable housing and housing that incorporates Universal Design; an Affordable Housing Program that requires all new development contribute to development of new affordable housing, through on-site construction, payment of fees, or the equivalent; repeal of a Growth Management Ordinance that was hindering new affordable housing development; and streamlined provisions for accessory dwelling units and junior accessory dwelling units making it easier to build both, which will contribute to the affordable housing stock.

Over the next year, the Urban County and cities of Santa Rosa and Petaluma will be completing an Assessment of Fair Housing report. Part of the Assessment includes setting Fair Housing

Goals and Priorities.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

All of the projects recommended for funding under this FY 2022-2023 Action Plan address one or more of the obstacles to meet underserved needs delineated in the Consolidated Plan. The projects recommended for funding in FY 22-23 also take into account the impact of the 2017 and 2019 fires and the COVID pandemic on vulnerable populations. Also, the County of Sonoma has committed County General Funds to support programs that serve the needs of the most vulnerable in the community through the County Fund for Housing (CFH). The Community Development Commission has allocated the maximum amount of income from its former redevelopment assets that are allowable under State Redevelopment Law to rapid re-housing and homelessness prevention services. The County also received approximately \$4.7 million in the 2020-21 Fiscal Year in CDBG-DR funds from the State in response to the 2017 Federally declared disasters. Projects and programs recommended for funding demonstrate efficiencies to best utilize the decreasing amounts of funding available to support their endeavors. Affordable housing projects recommended for funding are based on readiness to proceed and innovative approaches to overcoming regulatory barriers and provide or preserve both rental and homeownership housing opportunities for lower-income persons, especially households at risk of homelessness. Housing rehabilitation projects serve low-income homeowners, who are often elderly or disabled. Loans provided to these households help to keep them from becoming homeless and preserve the existing affordable housing stock. Emergency rental assistance and family self-sufficiency activities enable lower-income individuals and families to obtain and retain rental housing in the high-priced market in Sonoma County. The high cost of housing is a contributing factor in the County's homeless population, especially following the October 2017 fires which exacerbated an already tight rental market. The emergency shelter, transitional housing, permanent supportive housing, and homelessness prevention and rapid re-housing assistance recommended for funding assist those in need to move as quickly as possible towards stable, permanent housing.

Actions planned to address obstacles to meeting underserved needs

In response to Sonoma County's overheated housing market, low vacancy rates for rental housing, high cost of home ownership, and a much higher than normal percentage of homeless residents needing housing in the jurisdiction, and the post-fire recovery needs impacting the community, the Commission has never had a more important impetus to meet the needs of those who are underserved in our community.

The 2020 Point-in-Time Homeless Count showed that the total number of people experiencing

homelessness on any given night in Sonoma County declined, despite a 6% increase in the immediate aftermath of the 2017 Sonoma Complex Fire disaster. Following the 2017 fires, the Commission's Homeless Count has included a telephone survey to learn about people who are living in unstable situations. These are people who are couch surfing or doubled up, or who have no lease. People living in these situations are the most at risk of becoming homeless. The study showed that approximately 21,725 County residents are living in these unstable situations – 7% of County households. More than half of these lost their housing as a direct result of the fires or due to the fires' economic impact. The annual homeless count, along with the new telephone survey suggest a new wave of people are already becoming homeless as they exhaust their resources following the fires. Thousands more are at risk.

In December 2019, in response to a massive encampment and public health emergency along one of the County Parks department's biking trails, the Sonoma County Board of Supervisors made a range of new investments to expand permanent supportive housing, temporary shelter, and supportive services appropriate to the needs of unsheltered and vulnerable persons. These investments represented an unprecedented collaboration between County agencies to address underserved needs. The efforts began as a result of the encampment clearing, and State declared homeless emergency continues into 2022-23 with a sense of collaboration continuing as the hallmark of the County response.

The County and Commission continue to seek opportunities and funding to support affordable housing and ending homelessness.

Actions planned to foster and maintain affordable housing

In response to *Sonoma County's 2011 Analysis of Impediments to Fair Housing Choice* report which cited the lack of affordable housing as a barrier to fair housing choice, the Community Development Commission will continue to use its CDBG, HOME and ESG funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons. In addition, in FY 2022-2023, the Commission has committed its 15% CDBG public services set-aside to support fair housing services, that includes eviction defense. Staff is working with partners to ensure that the scope of contracted fair housing providers is responsive to the needs identified in the 2011 Analysis of Impediments and reflects fair housing program best practices. Furthermore, the Commission is in the process of its *2020 Assessment of Fair Housing* to thoroughly examine fair housing issues in the community including segregation, disparate impact of local policies on protected classes, and disparate access to

education, jobs, and transportation, and housing.

Actions planned to reduce lead-based paint hazards

Making housing lead-safe is the most effective strategy to protect children from lead poisoning. The Community Development Commission addresses this through proactively distributing printed information concerning lead-based paint hazards to all residents of housing rehabilitation and rental assistance programs. The Commission's Housing Quality Standards (HQS) Inspectors have received training in visual assessment of lead-based paint hazards and are observant of the existence of this hazard during their property inspections, thereby preventing exposure to lead hazards by identifying the risks before families with children under six years of age move into rental units that are assisted by the Housing Authority.

The Commission's Construction Services Specialists are trained in the identification of lead hazards, proper methods of paint stabilization, interim control, abatement procedures, and testing/clearance reports to ensure compliance with all lead hazard reduction requirements during rehabilitation activities. Additionally, Construction Services is investing in staff training, so the Commission will have a certified lead tester to identify the level of abatement required during future rehabilitation projects. Any dwellings not exempt from HUD's lead hazard reduction provisions (single-room occupancy, dedicated senior housing and housing construction after 1978) renovated under the Housing Rehabilitation Program undergo a lead hazard risk assessment by a state-certified Risk Assessor before the formulation of the project's scope of work. Any identified lead hazards are addressed in the scope of work, and a certified clearance is obtained before the project is considered complete.

The Commission will also ensure compliance with lead hazard reduction requirements by subrecipients of CDBG and HOME funding used to acquire and/or renovate existing buildings for housing or to undertake residential and re-housing service activities through regular monitoring of those activities.

Actions planned to reduce the number of poverty-level families

The Urban County will work to reduce the number of poverty-level families by targeting CDBG, HOME, ESG and local funds to projects that will provide services to foster self-sufficiency, in conjunction with the provision of housing and shelter. The Commission will also continue to

work closely with organizations that prioritize upstream investments.

Actions planned to develop institutional structure

The Sonoma County Community Development Commission will engage County Departments, cities, and community partners receiving CDBG, HOME, and ESG funding to carry out the activities in this plan during the next year. The anticipated outcome of this engagement will be a stronger social safety net and progress toward the alleviation of the causes and conditions of homelessness. Among the community partners are health, mental health, and service agencies who are key to fostering development of more supportive housing options throughout the County, and the nonprofit housing developers with whom they coordinate.

Under the direction of the Board of Supervisors, the Commission will spearhead initiatives to spur production of affordable rental housing by engaging developers and cities, collaborating with other County departments, updating funding policies, leveraging County-owned property, and proactively setting a production agenda.

The Sonoma County Housing Authority will strengthen the Housing Choice Voucher program's effectiveness by attracting new landlords, and by engaging participants, people on our wait lists, and community partners in a review of Housing Authority policies and practices and will build on existing relationships with local supportive service agencies to improve services offered to the Housing Authority's Family Self-Sufficiency participants. In July 2018, the Housing Authority hired a full-time Landlord Liaison who is dedicated to cultivating relationships with landlords who will provide additional housing opportunities for low-income families served through the various Housing Authority programs. The Housing Authority also received approval to use unspent administrative funds as a signing bonus and risk mitigation fund for landlords who agree to take Housing Choice Voucher tenants.

Through the Homeless System Redesign and the reformation of the CoC Board in late 2020, the homeless system of care is continuing to increase efforts to coordinate funding decisions and policies. This effort increased collaboration among the County, City of Santa Rosa, City of Petaluma, the County departments of Health Services and Human Services, and virtually all housing and homeless service providers throughout Sonoma County. These will strengthen the homeless system of care's performance on System Performance Measurements such as reducing the length of homeless episodes, reducing returns to homelessness, increasing placements in permanent housing, and increasing participant incomes.

Specific goals for addressing and preventing homelessness in Sonoma County were outlined in the CoC's 10-Year Homeless Action Plan 2014 Update. The 2019 consolidated application for

CoC funds also addressed the needs of homeless people in Sonoma County and can be accessed by contacting the Commission.

Finally, the Commission will strengthen internal systems to aid transparency, improve public engagement, and ensure maximum leverage of scarce public resources.

Actions planned to enhance coordination between public and private housing and social service agencies

The Community Development Commission will strengthen relationships with public and private entities to further the objectives of this plan. The Commission has been and will continue improving its data systems in coordination with other service agencies, hospitals, and County departments in the intersection of healthcare and housing. The Commission will improve its engagement with all agencies, public and private, County departments, as well as the general public and encourage participation in all public meetings and forums it holds. As part of the effort to conduct an Assessment of Fair Housing, the Commission will coordinate and collaborate with local groups and service providers conduct robust outreach in the community.

The CoC Board in coordination with Commission staff will recommend improved standards for administering ESG funds under the HEARTH Act, will begin implementation of key recommendations made in an evaluation of the Coordinated Entry System, and will invite participation from all local agencies that serve Sonoma County’s current and potential homeless population.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

No other forms of investment will be used in the FY 2022-2023 Action Plan.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The County does not fund homebuyer activities with HOME funds.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

N/A

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No HOME funds will be used for this purpose in the FY 2022-2023 Action Plan.

**Emergency Solutions Grant (ESG)
Reference 91.220(I)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Fiscal Year 2019-20 Home Sonoma County Consolidated Notice of Funding Availability (NOFA) Funding Policies.

For FY 2022-23, the new CoC Board opted to renew current contracts for a second year with a reduction in funds available, rather than issue a new NOFA for a competitive funding process. Therefore, the FY 2019-20 policies are the most recent standards. In addition, in its role as CoC, Home Sonoma County has developed the standards for projects operating with ESG funding.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Sonoma County CoC's Coordinated Entry System (CES) provides entry into housing via numerous access points for individuals, youth, and families experiencing homelessness with

a goal of providing participants with their choice of housing, shelter or services within 60 days of program enrollment. Since January 2018, Coordinated Entry has been the primary process for assessing severity of needs and ensuring that people experiencing homelessness can receive assistance in a timely fashion. Coordinated Entry covers the entire geography of the Sonoma County CoC and is the primary access point for referrals for permanent supportive housing and rapid re-housing as well as emergency crisis services/emergency shelter. The Commission provides funding to the Coordinated Entry Operator, Catholic Charities of the Diocese of Santa Rosa. Primary oversight of the Coordinated Entry System is performed by the CoC Coordinated Entry Advisory Committee. The fully compliant Coordinated Entry Policies and Procedures adopted by the CoC Board in January 2018 are attached to this Action Plan. A new Coordinated Entry provider, Home First, will begin operations in April 2022.

In spring 2019 the Commission engaged Technical Assistance Collaborative, Inc., a HUD technical assistance provider, to perform an evaluation of the Coordinated Entry (CE) implementation. The consultants interviewed Commission and Coordinated Entry staff at great length and held more than a dozen focus groups to learn what is working well with Coordinated Entry, and what needs to be improved. The final report from Technical Assistance Collaborative was published on July 2, 2019. The report included several recommendations for needed improvements to strengthen CE infrastructure, and work has begun on implementing those improvements.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The Sonoma County Community Development Commission allocates ESG funds (as well as local discretionary funds and a range of State funding) through a single competitive funding process governed by the Funding Policies. This allocation and contract administration function is staffed by the Commission's Ending Homelessness Team, which also provides staffing to the CoC and acts as HMIS Lead Agency. CoC consultation is achieved through a rating and ranking process for all applications that are eligible for ESG funds, conducted by the CoC Board's Evaluation Ad Hoc Group, and staffed by the Commission. HEARTH Act and Home Sonoma County policies, goals, and objectives—including standards for allocation of ESG funds—are fully integrated into the entitlement fund allocation process.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions

regarding facilities and services funded under ESG.

The County meets this requirement as two representatives on the CoC Board (governing body/CoC Board) are persons with recent lived experience of homelessness.

5. Describe performance standards for evaluating ESG.

The Sonoma County Community Development Commission staff follows the same procedures in monitoring and evaluating all homeless services awards, including those funded with ESG (and local CSF, LMIHAF and State ESG and other State funds). Minimally, all awardees are required to complete a 'desktop monitoring' process (respond to an in-depth questionnaire); all ESG awardees are monitored on site each year. When ESG-funded programs are monitored, HEARTH Act performance measures and ESG policies and criteria are included in the overall monitoring. The FY 2019-20 Funding Policies for Homeless Services required scoring of projects based on performance in the areas of temporary or permanent housing placement (for street outreach and day center projects), permanent housing placement (for shelter and rapid re-housing projects), and permanent housing retention (for permanent supportive housing projects). The policies set benchmarks for expected performance based on the 2016 System Performance Measures, broken out by program type as follows:

- Street Outreach/Day Center/Coordinated Entry—placement in temporary or permanent housing: 35%
- Emergency Shelters—exit to permanent housing: 21%
- Rapid Re-Housing—exit to permanent housing: 90%
- Permanent Supportive Housing—retention of permanent housing: 90%