

Amendment on May 10, 2020 to revise the planned use of FY 2020-21 ESG-CV funding.

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	1,885,182	230,000	0	2,115,182	7,421,876	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	895,882	19,000	0	914,882	3,584,028	HOME funds will be used to finance affordable rental housing development and preservation, and to provide tenant-based rental assistance

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	163,560	0	0	163,560	654,240	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.
ESG-CV	public-federal	Shelter and services for people who are homeless	7,162,916	0	0	0	7,162,916	Supplemental ESG 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: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Admin and Planning Rapid re-housing (rental assistance) Other	3,976,409	0	0	3,976,409	15,905,636	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	36,492,099	0	0	36,492,099	145,968,396	Section 8 funds are used for tenant based and project based vouchers and are administered by the Sonoma County Housing Authority.

Table 1 - 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 the 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 Continuum of Care 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. The CARES Act waives the match requirement for the ESG-CV funds.

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 former Sonoma County 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	2020	2025	Affordable Housing		Affordable Housing	CDBG: \$714,030 HOME: \$744,007 Section 8: \$36,492,099	Rental units constructed: 40 Household Housing Unit Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit Homeowner Housing Rehabilitated: 6 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 2820 Households Assisted Housing for Homeless added: 10 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2020	2025	Homeless		Homelessness	ESG: \$163,560 ESG-CV: 7,162,916 Competitive McKinney-Vento Homeless Assistance Act: \$3,976,409	Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted Homeless Person Overnight Shelter: 750 Persons Assisted Homelessness Prevention: 250 Persons Assisted Rapid-rehousing, non-congregate shelter and services to prevent, prepare for, and respond to the Coronavirus.
3	Non-Housing Community Development	2020	2025	Non-Homeless Special Needs Non-Housing Community Development		Non-Housing Community Development	CDBG: \$913,740	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13000 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 680 Persons Assisted

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	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	Goal Name	Homelessness
	Goal Description	Promote effective and proven strategies for homelessness prevention and intervention county-wide.
3	Goal Name	Non-Housing Community Development
	Goal Description	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; and b) Promote the well-being and economic integration of lower income persons.

Projects

AP-35 Projects – 91.220(d)

Introduction

In FY 2020-2021, Sonoma County will receive \$1,885,182 in CDBG funds. CDBG funds will be used for housing, 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. Administrative costs are limited to 20 percent of the total CDBG funding and 20 percent of program income received.

In FY 2020-2021, Sonoma County will receive \$895,882 in HOME Program funds. HOME funds will be used for new rental construction, housing rehabilitation, and tenant-based rental assistance. Federal regulations normally require a minimum of 15 percent of each year's HOME allocation to be set-aside for projects sponsored by CHDOs, however, this set-aside requirement was waived due to the COVID-19 emergency after projects were recommended for funding.

In FY 2020-2021, Sonoma County will receive \$163,560 in ESG funds. Funding will be used primarily for Rapid Re-Housing and Shelter services.

Projects

#	Project Name
1	CDBG - General Administration
2	Acquisition, Disposition and Predevelopment
3	2020 Affordable Housing
4	CDBG 2020 Public Facilities and Infrastructure Improvements
5	CDBG 2020 Fair Housing and Housing Justice Program
6	ESG20 Sonoma County
7	2020 HOME Administration

Table 3 - Project Information

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

AP-38 Project Summary
Project Summary Information

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: \$417,094
	Description	Administration of the 2020 CDBG 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	6/30/2021
	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 programs
2	Project Name	Acquisition, Disposition and Predevelopment
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$40,000
	Description	The City will utilize CDBG funds, including entitlement funds and program income, to fund housing project activities, including housing rehabilitation work, affordable housing rehabilitation, environmental reviews, and deepening affordability in existing homeowner and rental units.
	Target Date	12/31/2020

	Estimate the number and type of families that will benefit from the proposed activities	300 individuals experiencing homelessness will have access to emergency housing and dignity services.
	Location Description	Countywide
	Planned Activities	Catholic Charities Caritas Center is recommended for funds to complete a NEPA Environmental Assessment.
3	Project Name	2020 Affordable Housing
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$714,030 HOME: \$642,040
	Description	The County will utilize CDBG funds, including entitlement funds and program income, to fund housing project activities, including housing rehabilitation work, affordable housing rehabilitation, predevelopment on affordable housing projects, and creating affordable homeownership opportunities for low/mod residents. HOME Funds will be used to create affordable housing opportunity through construction of new units and Tenant-Based Rental Assistance for low-income individuals. A Waiver granted through the 2020 CARES Act enabled the Commission to use the CHDO Set-aside of \$134,401 for additional Tenant-Based rental assistance.
	Target Date	4/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	21 low-income individuals and families
	Location Description	Countywide
	Planned Activities	City of Rohnert Park Essential Workforce Housing Program which will buy down affordability for two single-family homes to make them affordable forever; Sonoma County Housing Rehabilitation Program; BRIDGE Housing Cotati Station predevelopment work; and Tenant-Based Rental Assistance
4	Project Name	CDBG 2020 Public Facilities and Infrastructure Improvements
	Target Area	

	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$630,920
	Description	The County will utilize CDBG funds to improve public facilities and public infrastructure to meet the demands of citizens in LMI areas or to meet the needs of LMC in specific areas. This will include ADA accessibility improvements and infrastructure updates.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	13,000 low to moderate-income residents who reside in areas that will receive funds for infrastructure improvements.
	Location Description	Countywide
	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.
5	Project Name	CDBG 2020 Fair Housing and Housing Justice Program
	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$282,820
	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	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	680 persons will be assisted
	Location Description	Countywide
	Planned Activities	Fair Housing Advocates of Northern California Housing Education program and Legal Aid Housing Justice Program
	Project Name	ESG20 Sonoma County

6	Target Area	Countywide
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	ESG 2020 Annual Allocation: \$163,560 ESG-CV: 7,162,916
	Description	<p>\$7,162,916 in 2020 ESG-CV funds will be used for activities that prepare for, prevent, and respond to the coronavirus, separated out as follows:</p> <p>Rapid Re-Housing - \$50,000 Non-Congregate Shelter Operations - \$4,811,177 HMIS Support - \$395,826 Street Outreach - \$1,189,622 Administration - \$716,291</p> <p>\$163,560 in 2020 ESG Funds will be used by Catholic Charities for Rapid-Rehousing and shelter services. No more than 60% of the \$163,560 will go to the Catholic Charities' Family Support Center, while the remainder will go to Rapid-Rehousing programs. \$12,267 (7.5%) of the funds will be used for administration of the ESG 2020 Program for Sonoma County.</p>
	Target Date	8/31/2022
	Estimate the number and type of families that will benefit from the proposed activities	163 households through Rapid Rehousing, and 750 individuals supported by beds at the shelter.
	Location Description	
	Planned Activities	
7	Project Name	2020 HOME Administration
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$89,476

Description	Administration of the 2020 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	
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	Countywide
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 2020-2021 Action Plan, Year 1, 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 4 - 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 2020-2021. 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	143
Non-Homeless	73
Special-Needs	5
Total	221

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	160
The Production of New Units	48
Rehab of Existing Units	11
Acquisition of Existing Units	2
Total	221

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

Satellite Affordable Housing Associates has begun construction on Altamira Apartments in Sonoma, 47 rental homes affordable to extremely low-, and very low-income households and one manager’s unit. Sonoma County Affordable Housing, Inc. will rehabilitate Riverfield Homes in Healdsburg, 17 rental homes affordable to extremely low- and very low-income households and one manager’s unit. The City of Sebastopol will rehabilitate two rental apartments at Village Park Mobile Home Park, affordable to low-income households. At least one of the apartments will be made available to disabled persons, and both will serve homeless households. DSLC 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 17 vulnerable households. The Commission’s Housing Rehabilitation program will rehabilitate at least six homes for low-income seniors and residents with disabilities. ESG funds will be used to support Rapid-Rehousing programs which will serve approximately 143 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 2015 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 19 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 Continuum of Care's System-wide Performance Measures.

The Commission staffs the Home Sonoma County Leadership and Technical Advisory Committees, which comprise the local Continuum of Care. In addition to the funding cycle described above, another \$3.9 million annually in Continuum of Care funding is used annually to address homelessness. As Lead Agency for Home Sonoma County 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 \$219,283 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 2020-21.

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 2019-20, \$220,885 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 \$304,217 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 12-bed 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, COTS, Sonoma Overnight Support (City of Sonoma), Social Advocates for Youth, 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, the availability of ongoing resources for such expansions is currently unknown.

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 2020-21, the Community Development Commission has allocated ESG, along with local and State funds, for two Rapid Re-Housing projects (operated by Catholic Charities and COTS) that will serve up to 143 households. Local and State funds will support Rapid Re-Housing assistance for another 270 households throughout the Urban County. Local and State HHAP funds will additionally pay for the cost of services and housing operations at eight permanent

supportive housing projects serving 310 persons in Santa Rosa, Cotati, Rohnert Park, Cloverdale, and Sebastopol in Rohnert Park. The Commission will fund 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 collaborative applicant for \$3.9 million in Continuum of Care 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 Continuum of Care 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 County, Cities and local nonprofit agencies offer a range of programs that provide financial and other assistance to those who are at-risk of becoming homeless due to financial emergencies, loss of existing dwelling units through inaccessibility by persons with mobility impairments, natural disasters, or unabated deterioration. For FY 2020-21, the Commission will use local funds and \$324,317 in CDBG funds for housing rehabilitation that will assist low-income households to stay in their homes. Through the Home Sonoma County consolidated homeless services competition, the Commission also allocated State and local funds for the Homelessness Prevention/Diversion programs run by Catholic Charities and COTS, which both operate alongside the Coordinated Entry System, and combined will serve approximately 550 households. The Commission is also using state and local funds to support Social Advocates’ for Youth Homelessness Prevention program which will serve approximately 30 transition-age youth. In addition, the Commission is allocating additional local funds for staffing for the HCA Family

Fund (a rental assistance and financial education program operated by Community Action Partnership, serving 225 households annually). Lastly in this area, in FY 2020-21 the Commission will continue and expand its support for an effort to improve the housing stability of seniors by matching homeless and at risk persons with seniors who have rooms to rent (SHARE Sonoma County – projected to serve at least 425 individuals in in FY 2020-21).

In FY 2020-21, the Commission will continue its involvement in ACCESS Sonoma, a County Interagency Multi-Disciplinary Team streamlining services for shared clients, in collaboration with the County Departments of Health Services, Human Services, Child Support Services and Probation.

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 2019 study, the California Housing Partnership Corporation found that 76% 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 16,296 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 this 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 2019-2020. 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, Sonoma County Permit and Resource Management Department, known as 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 AI 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 2020-2021 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 20-21 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). In addition, 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 a more important charge than ever to meet the needs of those who are underserved in our community.

The 2019 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. While it is currently impossible to predict County agencies’ capacities to continue such projects in the aftermath of the coronavirus pandemic, collaboration will continue to be 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 2020-2021, 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 establishment of the Home Sonoma County, the homeless system of care now has a single regional decision-making body that oversees homeless system policies and funding. This effort increased collaboration among the County, City of Santa Rosa, City of Petaluma, the County Departments of Health 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 Continuum of Care's 10-Year Homeless Action Plan 2014 Update. The 2019 consolidated application for Continuum of Care funds also addressed the needs of homeless people in Sonoma County and can be accessed by contacting the Commission. Home Sonoma County has embarked on a new strategic planning process to establish specific goals and priorities, which will be completed later in 2020.

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 Home Sonoma County Leadership Council 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.	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 First 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 First 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 First 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 First Year Action Plan

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

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

See Fiscal Year 2019-20 Home Sonoma County Consolidated Notice of Funding Availability (NOFA) Funding Policies attached. For FY 2020-21, the Home Sonoma County Leadership Council 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 Continuum of Care, Home Sonoma County has developed the attached 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 Continuum of Care'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 Continuum of Care 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 HOME Sonoma County Coordinated Entry/Housing First Task Group. The fully compliant Coordinated Entry Policies and Procedures adopted by the Continuum of Care 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 attached Funding Policies. This allocation and contract administration function is staffed by the Commission's Ending Homelessness Team, which also provides staffing to Home Sonoma County (aka the Continuum of Care) and acts as HMIS Lead Agency. Continuum of Care consultation is achieved through a rating and ranking process for all applications that are eligible for ESG funds, conducted by the Home Sonoma County Performance Measurement and Evaluation Task 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.

This is not applicable. Two representatives on the Home Sonoma County Leadership Council (governing body/CoC Board) are persons with recent lived experience of homelessness. In addition one member of the Home Sonoma County Technical Advisory Committee is a person with recent lived experience of homelessness, who has agreed to lead a Consumer Advisory Committee to ensure the perspectives of lived experience are included in all policy-making and funding decisions.

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%

Housing Trust Fund (HTF)
Reference 24 CFR 91.220(I)(5)

1. Distribution of Funds

a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).

b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.

c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.

d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted

with HTF funds will comply with HTF requirements?

4. Performance Goals and Benchmarks. The jurisdiction has met the requirement to provide for performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

5. Rehabilitation Standards. The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

6. Resale or Recapture Guidelines. Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

7. HTF Affordable Homeownership Limits. If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

8. Limited Beneficiaries or Preferences. Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the

beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter “N/A.”

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

9. Refinancing of Existing Debt. Enter or attach the jurisdiction’s refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction’s refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter “N/A.”

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Discussion: