



**Cities & Towns Advisory Committee**  
 Sonoma County Community Development Commission

**Public Hearing**  
**Wednesday, October 16, 2019**  
 10:00am-11:30am  
 SCCDC Hearing Room  
 1440 Guerneville Road  
 Santa Rosa, California 95403

**Agenda**

- 1. Call to Order and Roll Call**
- 2. Public Comments for Items Not on the Agenda**
- 3. Approval of Minutes from April 17, 2019 and September 18, 2019 Meetings (pgs 3 and 6)**  
 The Committee will discuss and may take action to approve the minutes from April 17, 2019 and September 18, 2019 or may recommend changes to these minutes.
- 4. Selection of New Chair and Vice Chair (pg 8)**  
 Committee members will vote to appoint new City or Town representatives to act as chair and vice chair for the next 24 months in accordance with the bylaws. The term will begin in February 2020 and end in February 2022.
- 5. Update on Housing Authority Waitlist (pg 11)**  
 Staff will present an update on the status of the new lottery waitlist.
- 6. Approval of FY 2020-2021 Federal Funding Policies (pg 13)**  
 Staff will present marked-up FY 2020-2021 Funding Policies showing the changes from last year's policies and ask the committee to approve their use for the FY 2020-2021 Funding Cycle.
- 7. Public Hearing: Action Plan Amendment (pg 55)**  
 Staff will present a proposed amendment to the Action Plan to reprogram \$900,000 from delayed projects to shovel-ready projects in need of additional funds to meet the CDBG timeliness requirements and take comments from the public.
  - a) Open public hearing
  - b) Close public hearing
  - c) Committee Discussion
  - d) Motion to approve or make changes



**Cities & Towns Advisory Committee**  
Sonoma County Community Development Commission

**8. Adjournment**

Next Regular Meeting  
Not yet Scheduled

*Any writings or documents presented to a majority of the Community Development Committee regarding any item on this agenda will be made available for public inspection in the Sonoma County Community Development Commission office located at 1440 Guerneville Road, Santa Rosa, CA 95403 during normal business hours.*

**DISABLED ACCOMMODATION:** If you have a disability which requires an accommodation, an alternative format, or requires another person to assist you while attending this meeting, please contact the Administrative Services Officer at (707) 565-7520, as soon as possible to ensure arrangements for accommodation.

Language services available upon request.



**Public Hearing Concurrent with Community Development Committee  
Wednesday, April 17, 2019  
10am-11:30am**

**Minutes**

**1. Call to Order and Roll Call**

Joe Irvin called the meeting to order at 10:05 am and roll was called

CTAC Members Present: Kevin Thompson, City of Cloverdale; Joe Irvin, City of Healdsburg; Jeffrey Beiswenger, City of Rohnert Park; Henry Mikus, City of Sebastopol; Kristina Owens, Town of Windsor

CTAC Members Absent: City of Cotati, City of Sonoma

CDC Staff Present: Geoffrey Ross, Assistant Executive Director; Felicity Gasser, Federal Funding Administrator; Angela Morgan, Affordable Housing Finance Associate; Valerie Johnson, Asset Management and Compliance Specialist; Darrin O'Hara, Administrative Aide; Maria Contreras, Affordable Housing Finance Specialist; Holly Trujillo, Senior Community Development Specialist

Guests Present:

Michelle Edwards, Boys & Girls Club of Sonoma County

Caterina G, Catholic Charities

Colleen Carmichael, Reach for Home

Jenna Garcia, City of Rohnert Park

Mark Krug, Burbank Housing

Bert Bangsberg, Catholic Charities

Lake Kowell, Disability Services and Legal Center

Stephen Sotomayor, City of Healdsburg

Eileen Berry, Exchange Bank

Pamela Swan, Catholic Charities

**2. Public Comments for Items Not on the Agenda**

Michelle Edwards, Executive Vice President of the Boys & Girls Club of Sonoma County thanked the Committee for their support of public projects and highlighted the benefits of the Boys & Girls Club for low income families throughout Sonoma and Marin counties. She expressed that the Boys & Girls Club owns several buildings throughout Sonoma County that would be a fit for Capital Projects funding and would look forward to working with the Committee in the future on these projects.

**3. Approval of Minutes from February 20, 2019 Meeting**

City of Sebastopol moved to approve the minutes from the February 20, 2019 meeting.



City of Cloverdale seconded

Ayes: City of Healdsburg, City of Rohnert Park, Town of Windsor

Nays: None

Abstain: None

Absent: City of Cotati, City of Sonoma

#### **4. CD Committee Member Report Out: Fair Housing Conference Take-Aways**

This item was moved to the CD Committee's May agenda because participants of conference were not present.

#### **5. Public Hearing: Recommend the FY 2019-2020 Action Plan**

The public hearing was opened at 10:13am

Felicity Gasser, Federal Funding Administrator, provided a summary of the draft action plan which contains staff determinations of funding eligibility of applications that were presented to the Committees in February. The requirement that applicants be present for the Hearing was waived. The draft Action Plan will be presented to the Board of Supervisors on April 30<sup>th</sup>.

Some notable changes staff highlighted were:

City of Rohnert Park withdrew their request for \$73,000 for bicycle and pedestrian improvements. This money is being transferred to the Sebastopol Bodega Highway improvement in lieu of using program income funds for this project.

Staff is recommending that we fund a comprehensive program and staff will meet with each of the applicants (Legal Aid and Fair Housing Advocates) to talk about filling the gaps identified at the last meeting. Staff will not make a final determination about contracts but for a full program we can award combined.

City of Cloverdale asked for clarification on how allocation of CDBG funds was different this year as opposed to last year and if they would be making determinations of funding for Petaluma and Santa Rosa. Staff responded that in the past, the Commission set aside 30% of funds for the CTAC to decide on and the rest for the CD Committee. Now all funds are being decided upon jointly, aside from homeless and public services which are determined by the Home Sonoma County Leadership Council. Petaluma and Santa Rosa remain separate entitlement jurisdictions and so projects there cannot be funded by County CDBG unless there is a nexus to Countywide benefit. The Catholic Charities project, though in City of Santa Rosa, proposes to benefit the entire county.

City of Rohnert Park asked if the funds were heavily in favor of housing projects and



whether that would be the case every year. Geoffrey Ross, Assistant Executive Director, responded that each year staff and Committees would have an opportunity to examine the priorities of the committees and frame the RFP based on those priorities.

City of Healdsburg asked if the committees would ever see a project from County of Sonoma. Staff answered yes.

City of Sebastopol asked what the process would look like after final approval was given and when projects could commence. Felicity Gasser, Federal Funding Administrator, responded that the funds are available for a July 1, 2019 start date barring a delay from HUD. Projects would be underway shortly thereafter. Geoffrey Ross, Assistant Executive Director, added that projects funded by program income as opposed to next fiscal year's award dollars could be deployed immediately. Work cannot start until the money is in hand.

### **Public Comment**

Frank Bell, General Manager at the Sea Ranch, expressed the importance of the Sea Ranch roof repair project. He appreciated the comments made and efforts to bring this project forward in summer upon approval of funding.

Henry Mikus, City of Sebastopol, remarked that this year's process was very different from before. It was more user-friendly and engaging and he feels that the City is able to do better because of the information they were provided. He expressed appreciation for staff efforts.

## **6. Adjournment**

Joe Irvin adjourned the meeting at 10:41am

Respectfully submitted,  
Holly Trujillo, Senior Community Development Specialist



**Cities & Towns Advisory Committee**  
 Sonoma County Community Development Commission

Wednesday, September 18, 2019  
 Public Hearing

**Minutes**

**1. Call to Order and Roll Call**

Stephen Sotomayor, City of Healdsburg, called the meeting to order at 10:10 am and roll was called.

Cities & Towns Members Present: Craig Scott, City of Cotati; Stephen Sotomayor, City of Healdsburg; Jenna Garcia, City of Rohnert Park; Kari Svanstrom, City of Sebastopol; Kristina Owens, Town of Windsor

CTAC Committee Members Absent: City of Cloverdale, City of Sonoma

CDC Staff Present: Felicity Gasser, Federal Funding Coordinator; Kirsten Larsen, Environmental Coordinator; Benjamin Wickham, Affordable Housing Director; Holly Kelley, Senior Community Development Specialist; Valerie Johnson, Housing Asset & Program Compliance Specialist; Allison Mayer, Quality Compliance Specialist; Suzanne Whipple, Homeless Services Administrative Specialist

Guests Present:

Paul Carrol, CAPSC

Lasette Sewell, Catholic Charities

**2. Public Comments for Items Not on the Agenda**

No public comments were made for items not on the agenda.

**3. Approval of Minutes from April 17, 2019 Meetings**

The Committee unanimously decided to abstain, due to no representative members having been at the previous meeting.

**4. Public Hearing: Consolidated Annual Performance and Evaluation Report**

Holly Kelley, Senior Community Development Specialist, presented a brief overview of the highlights of the draft Consolidated Annual Performance and Evaluation Report and invited comments from the Committee and the public. The Committee thanked staff for providing the report and had no comments.

**Public Comment**

No comments were made by the public.



**Cities & Towns Advisory Committee**  
 Sonoma County Community Development Commission

**5. Discuss FY 2020-2021 Federal Funding Policy Changes**

Felicity Gasser, Federal Funding Coordinator, recommended FY 2020-2021 Federal Funding Policy Changes for discussion by the Community Development Committee and Cities and Towns Advisory Committee. Staff invited feedback from Committee members that will be incorporated into final policies that will be brought to the Cities & Towns Advisory Committee for adoption in October. The Committee expressed concern about pulling funds from projects not meeting timeliness when the delay was caused by something outside the control of the subrecipient, and had questions about staff steering applicants toward different better-suited funding sources after an application was already submitted. The City of Healdsburg proposed incentives for partnering with Community Housing Development Organizations (CHDO) which has a 15% set-aside of CDBG funds, and perhaps encouraging creation of new CHDOs.

**Public Comment**

Paul Carrol, Community Action Partnership, pointed out that a lot of affordable housing is built in areas with heavy traffic. A lot of children who grow up in these homes end up with asthma, but there are certain design features that could mitigate exposure to particulates.

**6. Progress Report on Meeting Timeliness and Recommendations for an Action Plan Amendment**

Felicity Gasser, Federal Funding Coordinator, presented a memo including the current status of all open CDBG projects and asked the Committee for a recommendation to request that staff work with each jurisdiction that will ensure timely spending of CDBG funds and bring forward an Action Plan Amendment to the Board of Supervisors in October. Staff will do an assessment of projects that are able to spend the money quickly and those that are delayed in order to ensure that the Commission passes its timeliness test in May. The City of Cotati expressed appreciation for the proposal, and reported that their path of travel project is ready to proceed but just needs extra funds to award the construction contract.

**Public Comment**

No comments were made by the public

**7. Adjournment**

Stephen Sotomayor adjourned the meeting at 11:07AM

Respectfully Submitted,  
 Holly Kelley, Senior Community Development Specialist

SONOMA COUNTY COMMUNITY DEVELOPMENT  
TECHNICAL ADVISORY COMMITTEE  
Commonly known as the Cities and Town Advisory Committee  
BY-LAWS

ARTICLE I

PURPOSE

Section 1. (a) To review and make recommendations on matters related to the distribution of federal funds available to Sonoma County for Community Development activities related to housing and community development, public works and economic development that serve the Urban County as may come before the Sonoma County Community Development Commission. All activities of the Committee are to take place prior to Commission action.

(b) To perform such other functions of the Commission as the Commission may, by ordinance, resolution or minute order delegate to it.

(c) To perform other functions as the Commission may delegate to it.

ARTICLE II

ORGANIZATION

Section 1. The Committee shall be composed of seven (7) voting members comprised of one staff member as appointed by each of the seven participating municipalities. Each municipality may also appoint a second staff member to serve as a designated alternate. All members of the Committee shall serve so long as he/she holds their respective professional position.

Section 2. To aid the public in understanding the role and purpose of the Technical Advisory Committee, it shall hereby be commonly known as the Cities and Town Advisory Committee.

ARTICLE III

MEETINGS

Section 1. Meetings. Meetings shall be held periodically as business dictates.

Section 2. Public Hearings. The Committee shall receive public testimony at a minimum of one public hearing annually. The purpose of the hearing(s) shall be to aid the Committee in setting priorities for the use of Community Development Block Grant funds available for housing and community development, public works and economic development



activities and Home Investment Partnership Program funds available for development and rehabilitation of affordable housing and tenant based rental assistance that serve the Urban County. All public hearings will be noticed publicly in the Press Democrat and to all Committee members at least 72 hours in advance of said meetings.

Section 3. Notification - Regular Meetings. Each member shall be notified of the time and place of each regular meeting: Said notice shall be delivered by email, in writing, mailed or hand-delivered to the last known address of each member or deposited in the post office at least three days prior to the date appointed for the meeting.

Section 4. Quorum. A majority of the voting members of the Committee shall constitute a quorum.

Section 5. Adjournment. The Committee may adjourn from time to time, absentees being notified thereof, and in the event there shall be no quorum present on the day fixed for a meeting, the Committee members present may adjourn from time to time until a quorum is obtained.

Section 6. State Laws. All provisions of the Government Code (including Sections 54950 - 54960, the Ralph M. Brown Act) shall be followed in the scheduling, notification and conduct of all meetings of the Committee.

## ARTICLE IV

### OFFICERS

Section 1. The officers of the Sonoma County Community Development Technical Advisory Committee shall consist of a Chairperson and a Vice-Chairperson, elected by a majority vote of the Committee.

Section 2. Election of Officers. Election of officers shall take place once every two years.

Section 3. Term of Office. The officers shall hold office for twenty-four (24) months or until their successors are elected.

Section 4. Duties. The Chairperson shall chair the meetings. In the absence of the Chairperson, the Vice-Chairperson shall chair the meetings.

## ARTICLE V

### CONDUCT OF BUSINESS

Section 1. Business at Meetings. No business shall be transacted at any meeting other than that named in the call thereof.

Section 2. Chairperson at the Meetings. Meetings shall be called to order by the Chairperson or in the absence of the Chairperson by the Vice-Chairperson.

Section 3. Meeting Attendance and Records. The staff of the Sonoma County Community Development Commission shall be responsible for keeping a record of those Committee members present and those absent and for recording the events of the meetings in the form of minutes.

Section 4. Meetings shall be conducted according to Rosenberg's Rules of Order.

## ARTICLE VI

### AMENDMENTS

Section 1. Amending By-Laws. These By-Laws may be added to or amended at any regular meeting on motion, duly seconded and carried by at least four of the seven Committee members.

DULY ADOPTED AND PASSED by the Sonoma County Community Development Technical Advisory Committee this 21st day of August, 2006; as amended the 20<sup>th</sup> day of November 2018.

SO ORDERED.



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

*Members of the Commission*

**David Rabbitt**  
Chair

**Susan Gorin**  
Vice Chair

**Shirlee Zane**  
**James Gore**  
**Lynda Hopkins**

**Geoffrey M Ross**  
Executive Director

**MEMORANDUM**

Date: October 16, 2019

To: Community Development Committee

From: Martha Cheever, Housing Authority Manager  
 Cynthia Meiswinkel, Waitlist and Occupancy Supervisor

Subject: Update on Housing Authority Waitlists

On May 22, 2019, a public hearing was conducted before this Committee regarding proposed changes to the Housing Authority waitlist process. The Committee voted 5-1 in favor of making sweeping changes to the waitlist process in order to make the programs more accessible to low-income persons in a timely manner. The most significant changes that were discussed in the meeting included the cancelation of the existing waitlist which consisted of close to 27,000 households and the removal of a local residency preference. Changes to the waitlist were authorized by the Board of Commissioners on June 4, 2019.

On July 1, 2019, the Housing Authority opened the application for a new Housing Choice Voucher waitlist and eleven, site-specific project based voucher waitlists. After extensive outreach, the waitlists closed at 11:59 PM on July 31, 2019. In total, 12,661 applications were received for the Housing Choice Voucher waitlist and 12,709 applications were received for project based voucher waitlists.

A software driven lottery was conducted on October 1, 2019. The lottery was random and applicants were selected for waitlists without regard for any preferences claimed. 500 applicants were placed on the Housing Choice Voucher waitlist and an additional 6,819 applications were placed on the eleven project based voucher waitlists. Many applicants were placed on more than one waitlist. In total 2,842 unique applicants were placed on at least one waitlist. All applicants were sent notification via U.S. Mail of their status on the waitlists during the week of October 14, 2019.

Below are statistics on the new waitlists:

HCV Waitlist (500)		
<b>Sonoma County Residents</b>	216	43%
<b>Disabled</b>	215	43%
<b>Senior</b>	115	23%
<b>Senior + Disabled</b>	71	14%
<b>Experiencing Homelessness</b>	139	28%
<b>Families with Minor Children</b>	189	38%
<b>Latino/Hispanic</b>	91	18%

PBV Waitlists (Cumulative - 6819)		
<b>Sonoma County Residents</b>	4635	68%
<b>Disabled</b>	4088	60%
<b>Senior</b>	2417	35%
<b>Senior + Disabled</b>	1641	24%
<b>Experiencing Homelessness</b>	2560	38%
<b>Families with Minor Children</b>	1627	24%
<b>Latino/Hispanic</b>	1424	21%



It is anticipated that the Housing Choice Voucher waitlist lottery will begin accepting applications in twelve to twenty-four months. Project Based Voucher waitlists will reopen at various times dependent upon the need for additional applicants.



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

MEMORANDUM

Date: October 16, 2019

To: Community Development Committee & Cities and Towns Advisory Committee

From: Felicity Gasser, Federal Funding Administrator

Subject: Agenda Item 5: Approval of FY 2020-2021 Federal Funding Policies

*Members of the  
Commission*

**David Rabbitt**  
Chair

**Susan Gorin**  
Vice Chair

**Shirlee Zane**  
**James Gore**  
**Lynda Hopkins**

**Geoffrey M. Ross**  
Executive Director

With both Committee’s recommendation to proceed at the September 18 Public Hearing with the outlined changes, staff is requesting the committee’s review and public feedback on the attached marked up policies to govern to govern the FY 2020-2021 Funding Cycle for Housing and Neighborhood Investments as well as Fair Housing Programs.

Staff requests approval of these funding policies from both the Cities and Towns Advisory Committee (CTAC) and the Community Development Committee.

Given the limited time for committees and the public to review resulting from delays in releasing the agenda packet due to PG & E De-energization on October 9<sup>th</sup>, the Committees may wish to postpone approval until the November 20<sup>th</sup> meeting of the Community Development Committee, which would allow time for committee members and the public to submit additional feedback for consideration.



**DRAFT**

**SONOMA COUNTY**  
**COMMUNITY DEVELOPMENT COMMISSION**

**FY 2020-2021**  
**CDBG & HOME**  
**Funding Policies**

*for*

*Affordable Housing*

*Non-Housing Capital Projects*

*and*

***Fair Housing and Housing Justice Program***

Draft Prepared and Distributed for Review

October ~~10~~<sup>7</sup>, 2019



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## 1. OVERVIEW

The County of Sonoma, as well as the seven municipalities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor, through a Joint Powers Agreement, comprise the Urban County, an entity recognized by the U.S. Department of Housing and Urban Development (HUD) as an entitlement jurisdiction eligible for formula grant funding under the CDBG, HOME, and other HUD programs. The cities of Santa Rosa and Petaluma, although located within the boundaries of Sonoma County, each qualify as separate entitlement jurisdictions and administer their respective HUD funding allocations. The references made in this document to “County” refer to the eight-jurisdiction Urban County.

This document, the FY 20~~2019~~-2021~~0~~ CDBG & HOME for Capital Projects Funding Policies, provides the policy framework to guide the allocation and administration of CDBG and HOME funds, consistent with federal rules, statutes, and regulations, as well as local priorities.

The Sonoma County Community Development Commission (Commission) is the designated local administrative body for each of the federal funding programs.

### 1.1. HUD Funding Programs

#### 1.1.1. Community Development Block Grant Program (CDBG)

The CDBG Program, as created by the federal Housing and Community Development Acts of 1974, as amended, has as its primary objective the development of viable communities through the provision of decent housing, a suitable living environment, and the expansion of economic opportunities, primarily for low- and moderate-income persons. At least 70 percent of Sonoma County’s CDBG funds must be used for activities that benefit low- and moderate-income persons (i.e., persons earning less than 80 percent of the area median income). Any programs or projects allocated CDBG funding must meet one of the following National Objectives:

- Benefit low- and moderate-income persons
- Prevent or eliminate slums and blight
- Meet an urgent need

#### ~~APPLICABLE SUSPENSION/WAIVER FOR FY 2019-20~~

~~Suspension and waiver of the CDBG requirements that disallow new construction of affordable housing as an eligible activity. The suspension and waiver permit to County to use CDBG funds for new construction. Effective through October 10, 2019.~~

Within the CDBG program, up to 15 percent of funds can be obligated for public service activities. In recent years, the Commission has used its public services set aside for a combination of homeless services and fair housing services. In FY 2020-2021, given the large investment from the State of California in ending homelessness, and the recognition by the Commission of the need to build a robust Fair Housing and Housing Justice Program, the Commission will use 100% of the CDBG Public Services Set-aside to fund its Fair Housing and Housing Justice Program. Clients served by this program are often prevented from becoming homeless because of legal interventions made. Because households who are served do not touch the HOME Sonoma County homeless system of care, decisions about awarding these funds are made by the Board of Supervisors, with recommendations from the Cities and Towns Advisory Committee and Community Development Committee, as Fair Housing and Housing Justice Programs are within their purview.

### 1.1.2. HOME Investment Partnership Program (HOME)

The Cranston-Gonzalez National Affordable Housing Act created the HOME Program in 1990. The HOME Program provides funding to local jurisdictions to increase the stock of housing affordable to very low- and low-income households. In 1991, HUD designated Sonoma County a Participating Jurisdiction under the HOME Program.

#### ~~APPLICABLE SUSPENSION/WAIVER FOR FY 2019-20~~

~~Suspension and waiver of the HOME requirement that requires a 15% set aside of the annual allocation for Community Housing Development Organizations (CHDOs). This requirement is reduced to 0%. The purpose of this suspension and waiver is to relieve the County of requirements that may impede use of funds to provide housing to persons displaced by the wildfire. **Effective for FY 2017, 2018, 2019 allocations.**~~

~~Suspension of the per-unit dollar limitations established for HOME. The cost of new construction of affordable housing will escalate due to the extensive damage caused by the wildfire. These high costs could exceed the maximum per-unit subsidy limit for HOME-assisted projects. The suspension provides the County the needed flexibility to assist low-income individuals and families. **Effective through March 27, 2020.**~~

### ~~4.2. Other Funding Programs~~

~~The Urban County also administers HUD funding for public services, in the form of a 15 percent set aside of CDBG funds and the federal Emergency Solutions Grant (ESG) program.~~

~~As part of its annual funding cycle, the Sonoma County Community Development Commission (Commission) also administers the locally funded County Community Services Funding (CSF), the Low and Moderate Income Housing Asset Fund (LMIHAF), and an allocation of State ESG funds. Per direction received from the County Board of Supervisors, the award process for these funds is integrated with the CDBG Public Services and ESG funding processes to the extent possible. The CSF, LMIHAF Services, and State ESG programs will follow the priorities set forth in the Consolidated Plan.~~

~~Policies related to CDBG Public Services, CSF, LMIHAF Services, and federal and State ESG funding are available in a separate document, Policies for Homeless Services Funding.~~

### ~~4.3.1.2. Consolidated Plan~~

The Consolidated Plan is a five-year plan required by HUD in order for Sonoma County to receive federal housing and community development funds under the CDBG, HOME, and the ESG programs. Federal ESG funds are awarded through a process governed by HOME Sonoma County, the governance structure for Sonoma County's homeless system of care. The Consolidated Plan, including the goals and specific objectives for the five-year period years, also includes the County's One-Year Action Plans for the use of CDBG, HOME, and local ESG funds during each fiscal year.

The goals and objectives are developed through a citizen participation process conducted concurrently with the first Action Plan's CDBG, HOME, and ESG funding approval process of each Consolidated Plan. The current new Consolidated Plan will covers the period from July 1, 202015 to June 30, 20250.

The Consolidated Plan serves the following four functions:

1. A planning document for Sonoma County, which builds on a participatory process.
2. A strategy to be followed in carrying out HUD programs

3. An action plan that provides a basis for assessing performance
4. A required element of the annual application for federal funds under HUD's CDBG, HOME, and ESG programs

The Sonoma County Consolidated Plan encompasses activities undertaken by the Urban County. The cities of Santa Rosa and Petaluma each establish an individual Consolidated Plan for their sole jurisdiction.

## **2. FUNDING GOALS AND OBJECTIVES**

These FY 20~~2018~~~~–2021~~~~19~~ Funding Policies are based on the goals and objectives that will be identified in the Sonoma County 20~~2015~~ Consolidated Plan. The Consolidated Plan will organize community priorities for the use of HUD funds by the Urban County. ~~These funding priorities have not yet been set for the FY 2020-2021 Consolidated Plan and will be informed by the completion of a 2019 Countwide Assessment of Fair Housing, to be completed in February 2020, and through a community engagement process to be undertaken in February, March and April 2020, by grouping said priorities into three categories: affordable housing, homelessness, and non-housing community development.~~

The ~~2015-2020~~ Consolidated Plan goals ~~are closely aligned with the~~ will align with the Strategic Priorities set by the Sonoma County Board of Supervisors on April 4, 2017, particularly "Securing our Safety Net" and "Housing for All." Sonoma County ~~is currently preparing a~~ also adopted a Recovery and Resiliency Framework in December 2018 that sets a vision for community recovery following the October 2017 fires. The Community Development Commission assisted in the development of this framework. It includes 5 strategy areas, three of which are closely aligned with and build upon the Consolidated Plan goals: Housing, Economy, and Safety Net Services. These multi-year priorities drive the Commission's work plans and will dovetail with the Consolidated Plan goals and objectives and the selection criteria for funding projects.

To begin preparing for the 2020-2021 Consolidated Plan, at a public hearing/meeting on March 20, 2019, related to the FY 2019-2020 Action Plan, the Cities and Towns Advisory Committee, and the Community Development Committee identified the following draft Selection Criteria for projects. These criteria were further refined during the September 18, 2019, Public Hearing at which the Committees gave direction to incorporate these criteria into the FY 2020-2021 Funding Policies. These criteria will be vetted and refined through a community engagement process currently underway and continuing through Spring 2020 to become a set of goals and objectives for the 5 Year Consolidated Plan.

### **1. The following Selection Criteria will continue to be used to rank projects:**

- Preference for projects that create or preserve affordable housing
- Preference for infrastructure or public facilities that support creation or preservation of affordable housing
- Preference for infrastructure or public facilities that support low or moderate-income populations
- Preference for projects that demonstrate that the proposed project can spend grant funding within the applicable timeliness provisions.
- Preference for projects that demonstrate need with evidence.
- For Non-Housing Projects: preference for projects that leverage public funds to the greatest extent possible or projects that meet a particular community need that cannot be met by other funding sources.

### **2. The following Selection Criteria will be added to those currently used to rank projects, based on last year's feedback from the committees:**

- Preference for projects that prevent displacement in high opportunity areas.
- Preference for housing projects with deep income targeting and special needs populations.

- Preference for projects that alleviate the impact of climate change on low-income populations. Examples include:
  - infill development
  - infrastructure to reduce environmental impacts in LMA communities including:
  - new energy-efficient housing construction
  - Considers mobility needs of low-income people, looking at a variety of factors, including:
  - Projects that are aligned with local jurisdiction's General Plan Climate Change Element & Equity Element
- **For Housing Projects: preference for:**
  - Projects that demonstrate funds will be leveraged against total development costs at least 7:1
  - Projects demonstrating advanced readiness via (a) entitlements; (b) financing commitments; (c) permitting
  - Project developers who can demonstrate previous success obtaining federal tax credits and/or state funding to develop housing within the last seven years
  - Projects that can demonstrate existing support from other jurisdictions via letters of support, funding commitments, etc.

**3. The policies will reflect committees' direction that awards be made with holistic attention to the following distribution of investments:**

- Balance projects with fast results with funding predevelopment for projects that need early money to be successful
- Balance creation of new housing stock with maintaining existing housing stock and keeping people in their homes.
- Make investments in low- and moderate-income areas that haven't had investments historically, and in high opportunity areas that increase access for low and moderate-income people.

~~The County has identified the following as priority objectives for the use of CDBG and HOME funds. These objectives will be used in the evaluation of proposals for the use of these funds.~~

~~**2.1. Affordable Housing**~~

~~2.1.1. Goal~~

~~To promote the well being and economic integration of lower income persons, increase and preserve the housing stock that is affordable, safe, and accessible for extremely low, very low, and low income families and individuals, including those with special needs and those who are homeless or at imminent risk of homelessness~~

~~2.1.2. Objectives~~

~~2.1.2.1. Develop new rental and ownership housing units that are affordable and available to extremely low, very low, and low income households, some with special needs. Give preference to applications for residential developments requesting CDBG or HOME funds that set aside homes for persons or households experiencing homelessness or who are at imminent risk of becoming homeless within 14 days.~~

~~2.1.2.2. Develop new housing units with appropriate supportive services that are affordable, accessible, and available to extremely low , very low , and low income special needs households.~~

~~2.1.2.3. Provide tenant-based rental subsidies to make market rate housing units affordable to very low income and low income households, some with special needs, with a preference for extremely low-income households and those experiencing or at risk of experiencing homelessness.~~

~~2.1.2.4. Provide comprehensive rehabilitation and targeted hazard mitigation assistance to make needed repairs and improvements to conventional single and multi family housing and mobile homes owned and/or occupied by extremely low , very low , and low income households, some with special needs.~~

~~2.1.2.5. Provide loans to eligible entities to acquire and/or rehabilitate existing multi-family housing affordable, accessible and available to extremely low , very low , and low income households at risk of becoming market rate housing. The occupants of some of these assisted housing units will include special needs households.~~

~~2.1.2.6. Provide direct fair housing education and mediation services to low and moderate income renter households, some with special needs. Guidelines on applying for funds to meet this objective found separately in the Policies for Homeless Services Funding.~~

## ~~2.2. Homelessness (NOTE: Funding for homelessness-related public services are found separately in the Policies for Homeless Services Funding.)~~

### ~~2.2.1. Goal~~

~~Promote effective and proven strategies for homelessness prevention and intervention county wide.~~

### ~~2.2.2. Objectives~~

~~2.2.2.1. Reduce the number of episodes of homelessness experienced by residents of Sonoma County.~~

~~2.2.2.2. Provide a platform of stable housing with supportive services to persons who are living “on the streets” or to persons leaving emergency shelters, some with special needs.~~

~~2.2.2.3. For residential developments requesting CDBG or HOME funds, give preference to applications that set aside homes for persons or households experiencing homelessness or who are at imminent risk of becoming homeless within 14 days.~~

## ~~2.3. Non-Housing Community Development~~

### ~~2.3.1. Goals~~

~~2.3.1.1. 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.~~

### ~~2.3.2. Objectives~~

~~2.3.2.1. Preserve low and moderate income neighborhoods and improve the quality of neighborhood-based living, including construction or reconstruction of storm/flood drain improvements, water and sewer improvements (connecting water and sewer lines to new or existing affordable housing developments, sewer~~

~~mains, and rural water facilities), streets, streetlights, sidewalks, and curbs and gutters (either non-existent or in need of repair or upgrade).~~

~~2.3.2.2. Construct, renovate, or install access modifications to reduce or eliminate architectural barriers to meet the special needs of persons with disabilities and the elderly in accordance with the American with Disabilities Act (ADA) in public facilities, including but not limited to public parks, re-streams, youth centers, senior centers, fire stations, libraries, and community recreation facilities.~~

### 3. FUNDING ALLOCATIONS

#### 3.1. CDBG Allocation

CDBG Funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the Board of Supervisors, not by federal regulation.

<i>Community Development Block Grant (CDBG) Allocation Categories</i>	<i>Percentage of Funding</i>	<i>Notes</i>
<b>County-Sponsored Projects, Countywide/Unincorporated Area Projects, City/Town Projects</b>	65%	These funds will be allocated in a competitive process to fund projects located in the Urban County sponsored by CDBG eligible recipients (all municipalities within the Urban County) and subrecipients (all other eligible applicants). Eligible projects are described in Appendix A.
<b>Public Services Projects</b>	15%	Percentage limited by CDBG federal regulations. <del>The process for awarding these funds is described in a separate document, called Policies for Homeless Services Funding. Given the federal mandate to Affirmatively Further Fair Housing, and the recommendation in the 2011 Analysis of Impediments to Fair Housing to strengthen the capacity of a local fair housing organization to reduce discriminatory activities, the Commission will spend its public services set-aside on a Fair Housing and Housing Justice Program.</del>
<b>Program Administration</b>	20%	Percentage limited by CDBG federal regulations.

#### 3.2. CDBG Program Income and Reprogrammed Funds Allocation

CDBG Program Income and Reprogrammed Funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the Board of Supervisors, not by federal regulation.

<i>Community Development Block Grant (CDBG) Allocation Categories</i>	<i>Percentage of Program Income</i>	<i>Notes</i>
<b>Community Development Commission Housing Rehabilitation Program and Homebuyer Assistance</b>	65%	Program income derived from all CDBG-funded projects will be allocated as follows: Sixty-five percent (65%) will be <del>used for housing rehabilitation and homebuyer assistance and associated direct program delivery costs</del>

		<p><del>in either the incorporated or unincorporated areas of the Urban County</del> expended pursuant to priorities set in the annual Action Plan. Use of program income may be subject to an Action Plan Amendment</p> <p>Reprogrammed funds from all projects other than public services <del>will be used for housing rehabilitation and homebuyer assistance and associated direct program delivery costs in either the incorporated or unincorporated areas of the Urban County</del>, will be expended pursuant to priorities set in the annual Action Plan. Use of reprogrammed funds may be subject to an Action Plan amendment.</p>
<b>Public Services</b>	15%	<p>Fifteen percent (15%) of program income derived from all CDBG-funded projects will be used for Public Services, as allowed under CDBG regulations. <del>Use of the 15% set-aside of program income will be expended pursuant to priorities set in the annual Action Plan and may be subject to an Action Plan amendment. The process for awarding these funds is described in a separate document, called Policies for Homeless Services Funding.</del></p> <p>Reprogrammed funds derived from Public Services will be <del>expended on Public Services pursuant to priorities set in the annual Action Plan and may be subject to an Action Plan amendment used for Public Services projects.</del></p>
<b>Program Administration</b>	Up to 20%	<p>Percentage limited by CDBG federal regulations. Commission will use up to twenty percent of CDBG program income for program administration and operation of the CDBG program.</p>

### 3.3. HOME Allocation

New annual allocations of HOME funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the Board of Supervisors, not by federal regulation.

<b>HOME Investment Partnership Program Categories</b>	<b>Percentage of Funding</b>	<b>Notes</b>
<b>Tenant-Based Rental Assistance, Development, and Preservation of Rental Housing</b>	Up to 90%	These funds will be allocated in a competitive process to fund projects or programs located in any of the eight Urban County jurisdictions. Eligible projects and programs are described in Appendix A.
<b>Community Housing Development Organizations operational support</b>	Up to 5%	Percentage limited by HOME federal regulations.
<del>Suspended/Waived for FY 17, FY 18, FY 19</del> <b>Community Housing Development Organization development or preservation of affordable housing set-aside</b>	At least 15%	Minimum required by HOME federal regulations. Per federal regulation, if this funding category is undersubscribed, any unallocated funds will roll over for allocation in the next fiscal year. Eligible projects are described elsewhere in these policies.
<b>Program Administration</b>	10%	Percentage limited by HOME federal regulations.



### 3.4. HOME Program Income and Reprogrammed Funds Allocation

HOME Program Income and Reprogrammed Funds shall be allocated per the table below.

<b>HOME Program Income and Reprogrammed Fund Categories</b>	<b>Percentage of Program Income</b>	<b>Notes</b>
<b>Executive Director's discretion</b>	90%	At the Executive Director's discretion, funds will be reallocated to the Sonoma County Housing Authority's Tenant-Based Rental Assistance Program, <u>reallocated through an Action Plan Amendment</u> , or rolled forward to the next fiscal year allocation.
<b>CHDO Projects</b>	CHDO reprogrammed funds	At the Executive Director's discretion, funds will be reallocated <del>to the Sonoma County Housing Authority's Tenant-Based Rental Assistance Program or through an Action Plan Amendment</del> or rolled forward to the next fiscal year allocation. <del>Suspended/Waived for FY 17, FY 18, FY 19:</del> CHDO Set-Aside funds may only be reprogrammed to eligible CHDO projects.
<b>Program Administration</b>	10%	Percentage limited by HOME federal regulations. Commission will use ten percent of program income for program administration and operation of the HOME program.

## 4. ELIGIBLE APPLICANTS

Individual persons are not eligible to apply for CDBG or HOME funds; however, individuals may apply for assistance from programs assisted with these funds such as housing rehabilitation, first-time homebuyer, or tenant-based rental assistance programs. [See 24 CFR 570.207(b)(4)]

### 4.1. CDBG

Eligible applicants for CDBG funding are specified by federal regulations. The type of eligible applicant varies by activity type. Generally, eligible applicants are governmental agencies, private non-profit organizations, and Community Based Development Organizations (CBDOs; see 24 CFR 570.204).

### 4.2. HOME

Only non-profit and qualifying for-profit organizations and public agencies or local government entities may apply for HOME funding. [See 24 CFR 92.504(c)(3).]

## 5. ELIGIBLE ACTIVITIES

Eligible activities are described in Appendix A.

## 6. TYPES OF ASSISTANCE

### 6.1. Form of Assistance – Rental Housing and Public Facility Projects

All financial assistance will be in the form of loans secured by real property except for non-housing projects (i.e. public facility projects) sponsored and owned by units of local government where the assistance will be in

the form of a grant. Generally, all loans will be three percent (3%) simple interest, with payments deferred for the term of the loans. See Sonoma County Community Development Commission Loan Policies for additional information regarding interest rates and other loan parameters. Upon completion of the project, Commission loans must be fully secured by the post-completion value of the property. The term of the loan will be the longer of thirty (30) years or the longest term of any project financing source.

## **6.2. Form of Assistance – Ownership Housing Projects**

The interest rate and security requirements for home-ownership projects will be the same as those for rental housing developments, as detailed above. The Commission loan to the developer will be for a maximum five-year term and will convert to deferred-payment, subordinate loans to income-eligible buyers at the time of first sale of each unit in the ownership project. The total amount of these loans will be sufficient to recapture the initial amount of Commission loan, plus any interest accrued on the Commission loan as of the date of conversion.

## **6.3. Funding Agreements, Subrecipient Agreements, Loan Documents and Close of Escrow**

The Commission will execute a Funding Agreement, Subrecipient Agreement or Developer Agreement ~~and Promissory Note~~ with each recipient, subrecipient, or developer receiving financial assistance. For financial assistance provided in the form of loans, the Commission will additionally execute a Promissory Note and record a Deed of Trust with a Rider in evidence of the Commission loan commitment and obligations.

## **6.4. Alternate Loan Terms**

The Commission will consider alternate loan terms that the applicant may request for coordination with other sources of project financing. On a case-by-case basis, the Commission staff may approve requests to assign the Subrecipient or Developer Agreement and/or Commission loan to a partnership or other assignee in compliance with HUD regulations.

# **7. FUNDING CONDITIONS AND PROGRAM REQUIREMENTS**

## **7.1. Timeliness**

All projects shall proceed in a timely manner, as detailed below. Extensions may be granted for good cause at the discretion of the Executive Director and must be consistent with the funding source regulations.

### **7.1.1. CDBG**

#### **7.1.1.1. Fair Housing and Housing Justice Program (CDBG)**

Funds for Fair Housing and Housing Justice Programs activities must be expended within the 12 months of the fiscal year for which funding is allocated. Funds that are unexpended after the agreement term will be reprogrammed.

#### **7.1.1.2. Public Facilities and Public Improvements (CDBG)**

The applicant must satisfy all conditions of approval that are set forth in these Funding Policies as a prerequisite to the CDC offering the Subrecipient Agreement for execution within 12 months of the start of the fiscal year associated with the award. Funds for all Public Facilities and Public Improvement projects, including predevelopment costs, hard and soft costs of construction, renovation or reconstruction (but excluding site acquisition costs, which are governed by 7.1.2 above), must be expended within 18 months of

the date on which the Subrecipient Agreement is offered for execution. Funds that are unexpended after this deadline will be reprogrammed.

#### 7.1.1.4.7.1.1.3. Site Acquisition (CDBG)

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as a prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Site Acquisition funds must be spent within 18 months of the date on which the Subrecipient Agreement is offered for execution. start of the fiscal year associated with the funding. The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. If the site acquisition is not complete within 18 months of the date on which the Subrecipient Agreement is offered for execution the start of the fiscal year associated with the award, the funds will be reprogrammed.

#### 7.1.1.4. Affordable Housing Development - CDBG

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Disbursement of funds for all affordable housing projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects- (but excluding Site Acquisition, which are governed by 7.1.1.3 above) must be initiated within 18 months of the date on which the Subrecipient or Developer Agreement is offered for execution. All funds must be disbursed within 24 months after the date on which the Subrecipient or Developer Agreement is offered for execution. Funds that are unexpended after this deadline will be reprogrammed.

#### 7.1.2. HOME

Affordable Housing Development (HOME)

##### 7.1.2.1.

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Disbursement of funds for all affordable housing projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects (but excluding site acquisition costs, which are governed by 7.1.2 above), must be initiated within 48-24 months of the date on which the Developer Agreement is offered for execution start of the fiscal year associated with the award. The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. All funds must be disbursed within 24-36 months after of the date on which the Developer Agreement is offered for execution the start of the fiscal year associated with the award. Funds that are unexpended after this deadline will be reprogrammed. Affordable housing projects must be completed within four years of the date on which the Developer Agreement is offered for execution. Project completion will be documented by the submission of temporary certificates of occupancy for all HOME-funded units. HOME-assisted rental units must be

occupied by income-eligible households within 12 months of project completion. A HOME-assisted homebuyer unit must have a ratified sales contract within six months of construction completion.

#### 7.1.2.2. Affordable Housing Development – CHDO set-aside (HOME)

The community housing development organization (CHDO) must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. The participating jurisdiction must enter into a legally binding agreement with the CHDO for a specific project within 24 months of the start of the fiscal year associated with the award. Disbursement of funds for all CHDO projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects must be initiated within 24 months of the date on which the Developer Agreement is offered for execution. All funds must be disbursed within 36 months of the date on which the Developer Agreement is offered for execution. CHDO projects must be completed within four years of the date on which the HOME Funding Agreement is offered for execution. Project completion will be documented by the submission of temporary certificates of occupancy for all HOME-funded units. HOME-assisted rental units must be occupied by income-eligible households within 18 months of project completion. A HOME-assisted homebuyer unit must have a ratified sales contract within nine months of construction completion.

#### 7.1.2.7.1.3. Tenant-Based Rental Assistance (HOME)

Funds for tenant-based rental assistance programs must be committed to specific households within 12 months of, and expended within 36 months of, the start of the fiscal year associated with the award. Funds that are unexpended after this deadline will be reprogrammed.

## **7.2. Site Control**

In order to demonstrate project readiness and facilitate compliance with the CDBG stress test [24 CFR 570.902(a)] and the HOME timeliness provisions [92.205(e)(2)], capital project applications must demonstrate site control at the time funding is made available to the County by HUD (generally August of the new fiscal year). An executed long-term lease, signed option or purchase agreement or equivalent, legally enforceable instrument may satisfy this requirement. If site control is not in force at the time HUD makes the funding available to the County, the funding approval will be rescinded and the funds will be reprogrammed.

## **7.3. Environmental Review**

All CDBG- and HOME-funded projects must comply with federal environmental regulations. [24 CFR part 58 National Environmental Policy Act of 1969 (NEPA) and 24 CFR 570.604 (CDBG) and 24 CFR 92.352 (HOME)]

Funding agreements may not be offered for execution until the required ~~federal~~ environmental conditions have been met.

### 7.3.1. Certifying Officer, Roles, and Responsibilities

The Commission's Executive Director is designated by the Board of Supervisors as the Certifying Officer for all National Environmental Policy Act (NEPA) environmental review of CDBG- and HOME-funded projects. Therefore, the Commission will determine and complete, or cause to be completed, the appropriate level of NEPA environmental review, the cost of which shall be the responsibility of the awardee, and may be paid

from the awarded grant or loan funds. The awardee must provide all requested information pertinent to completing the environmental review in a timely manner. Failure to do so will result in the reprogramming of the allocated funds to another project.

The applicant must provide the Commission with documentation verifying the satisfaction of any required environmental impact mitigation measures. [See 24 CFR part 58 Subpart B Section 58.13]

### 7.3.2. CEQA Compliance

If applicable, all projects must receive local environmental clearance in accordance with the requirements of the California Environmental Quality Act (CEQA). The ~~Commission will request applicant will submit~~ the CEQA status from ~~Permit and Resource Management Department (Permit Sonoma) the project's applicable Lead Agency with~~ ~~hen reviewing~~ the grant funding application. The applicant must submit a copy of the CEQA clearance to the Commission prior to a funding commitment being made. [See Cal. Code Regs. Tit. 14. Section 15000 et seq.;]

### 7.4. **Section 3**

All CDBG and HOME funded projects must comply with the provisions of Section 3 of the Housing and Urban Development Act of 1968, as amended, and with the implementing regulations set forth in 24 CFR Part 135. Any funded entity shall comply with these Section 3 requirements and with the Section 3 Affirmative Action Plan of the Community Development Commission at the time that the funding agreement is executed.

### 7.5. **Federal Labor Standards**

Federal Labor Standards requirements include the Davis-Bacon Act, Copeland "Anti-Kickback Act," and Contract Work Hours and Safety Standards Act, uUsually these requirements are referred to as "Davis-Bacon and Related Acts" or DBRA.

CDBG-funded construction or rehabilitation of properties with eight (8) or more total residential units trigger DBRA. [See 24 CFR part 570.603]

Any eligible use of HOME funds – including land acquisition, in which there are twelve (12) or more HOME-assisted units in the same project trigger DBRA. [See 24 CFR part 92.354 & HUD Handbook 1344.1]

### 7.6. **Reasonable Cost of Real Estate Acquisition**

For CDBG- and HOME-funded acquisition projects, the Commission must determine that the cost of the property is reasonable.

A property appraisal carried out by a licensed real estate appraiser, or other evidence of valuation acceptable to the Commission, must be provided to the Commission prior to the Commission offering a funding agreement for execution. Funds for direct site acquisition will not be provided if the purchase price exceeds the documented "reasonable cost" of the real property.

As defined in CFR 200.404 "A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost."

Funds for related transaction costs (e.g., title, soils tests, Phase I reports, etc.) may be allowed above the reasonable cost.

## 7.7. Land Use Approvals

In order to demonstrate project readiness and facilitate compliance with the CDBG stress test [24 CFR 570.902(a)] and the HOME timeliness provisions [92.205(e)(2)], all CDBG- and HOME-funded projects that require land use approvals must be consistent with the General Plan of the jurisdiction in which they are located. A certification of the project's consistency with the applicable General Plan, signed by an authorized representative of the jurisdiction, must be submitted with the project application. If a project does not have land use approvals, under certain circumstances funding can be provided for predevelopment expenses only as long as other threshold criteria are met.

## 7.8. Compliance with Disabled Access Requirements

All CDBG- and HOME-funded projects must be able to comply with the Architectural Barriers Act of 1968 (PL 90-480) and with 24 CFR Part 8 entitled "Nondiscrimination Based on Handicapped Status in Federally Assisted Programs and HUD Activities."

24 CFR Part 8 states that no qualified individual with disabilities shall, solely on the basis of disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Housing and Urban Development.

Disabled access must be provided to the greatest extent feasible in non-housing as well as housing facilities. Proposed projects that do not provide access for the disabled may not be considered for funding. In addition, all local and State disability access guidelines must be followed.

## 7.9. Building Standards

All capital projects (housing and non-housing) must be constructed and maintained in compliance with all applicable federal, State, and local codes, standards, and ordinances.

For HOME owner-occupied housing rehabilitation, unit must meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. HOME funds may not be used for emergency or small home repairs. [See 24 CFR 92.251]

## 7.10. Relocation and One-for-One Replacement

All CDBG- and HOME-funded projects must follow the relocation and one-for-one replacement procedures outlined in 24 CFR 570.606 (CDBG) and 24 CFR 92.353 (HOME) and in HUD's Uniform Relocation and Real Property Acquisition Act.

Projects requiring permanent displacement of families, individuals, and/or businesses must also comply with the Sonoma County Residential Anti-Displacement and Relocation Assistance Plan, found on the web, here: <http://sonomacounty.ca.gov/WorkArea/DownloadAsset.aspx?id=2147576719>.

## 7.11. Change in Use

### 7.11.1. Requirements for Urban County Jurisdictions

All properties acquired and/or improved by the County of Sonoma or participating municipalities that comprise the Urban County entitlement jurisdiction memorialized by a Joint Powers Agreement, using CDBG funds must comply with the CDBG regulations at 24 CFR 570.505, which require that the use of the property (including the beneficiaries of such use) cannot be changed from that for which the acquisition or improvement was made unless the jurisdiction in which the project is located provides affected citizens with

reasonable notice of, and opportunity to comment on, any proposed change, and either: (1) the new use of such property qualifies as a CDBG-eligible activity; or (2) if the jurisdiction determines, after consultation with affected citizens, that it is appropriate to change the use of the property to a use which does not qualify for CDBG funding, the jurisdiction reimburses the Sonoma County CDBG Program in the amount of the then current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, and improvements to, the property. This requirement shall be in effect until five (5) years after the Urban County is no longer participating in the CDBG Program. For County-owned or controlled properties, compliance with this requirement shall be secured through an annual certification.

#### 7.11.2. Requirements for All Other Entities

All properties acquired and/or improved by local government entities other than those described in the above paragraph and by non-profit agencies using CDBG funds must comply with the CDBG regulations at 24 CFR 570.503(7)(i) & (ii), which require that the property be used to meet one of the national objectives in 24 CFR 570.208 until five (5) years after expiration of the CDBG Subrecipient Agreement, or for such longer period of time as determined to be appropriate by the Commission; and that if the property is not used to meet one of the national objectives during this time period, the applicant shall pay to the Sonoma County CDBG Program an amount of the then current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, or improvement to, the property. Compliance with this requirement shall be secured by a deed restriction recorded on title to the acquired or improved property.

#### 7.12. **Demonstrating Benefit to Low- and Moderate-Income Persons**

If a project proposes to meet the National Objective of providing a benefit to low- and moderate-income persons, the project must be able to demonstrate that at least 51 percent of households qualify as low- or moderate-income. [See 24 CFR 570.208]

#### 7.13. **Affirmatively Furthering Fair Housing**

The Fair Housing Act reflects the federal requirement that HUD “use its grant programs to end discrimination and segregation, to the point where the supply of genuinely open housing increases.” As such, the Affirmatively Furthering Fair Housing rule requires fair housing planning to connect housing and community development policy and investment planning with meaningful actions that achieve material, positive changes in outcomes for protected classes: families with children, people with disabilities, and people of different races, colors and national origins. To be eligible for funding, a project must demonstrate what actions it takes to achieve material, positive changes that advance one of these four goals:

a. ~~\_\_\_\_\_~~ Decrease residential segregation

a. ~~\_\_\_\_\_~~

b. ~~\_\_\_\_\_~~ Eliminate racially and ethnically concentrated areas of poverty

b. ~~\_\_\_\_\_~~

c. ~~\_\_\_\_\_~~ Reduce unequal access to important community assets, including quality schools, job centers, and transit

c. ~~\_\_\_\_\_~~

d. ~~\_\_\_\_\_~~ Narrow gaps that result in disproportionate housing needs for people in protected classes

## **7.14. Affordability Restrictions for Housing Projects**

The following provisions identify the minimum affordability requirements for new housing development and rehabilitation of existing rental housing developments. Projects that provide greater and/or longer affordability than the minimums shown will receive a higher priority.

### **7.14.1. Income Limits**

One hundred percent of CDBG and HOME funds will be used to assist units occupied by households with incomes of no more than eighty percent (80%) of the Sonoma County area median income (AMI), adjusted for household size.

At least eighty percent (80%) of the units assisted with HOME funds must initially be occupied by households with incomes of no more than sixty percent (60%) of Sonoma County AMI, adjusted for household size. Subsequently, these units may be occupied by households with incomes of up to eighty percent (80%) of Sonoma County AMI, adjusted for household size.

At least twenty percent (20%) of the units assisted with HOME funds must be occupied by households with incomes of no more than fifty percent (50%) of the Sonoma County AMI, adjusted for household size.

### **7.14.2. Rent and Purchase Price Limits**

Units assisted with CDBG or HOME funds may be sold or rented to income-eligible households at affordable prices and rents, as determined by the Commission in accordance with HUD regulations.

### **7.14.3. Term of Income and Price Restrictions**

Upon completion or acquisition of a housing project, the assisted units must remain affordable for the longer of fifty-five (55) years or the longest affordability term required by other financing in the project. In no case shall the period of affordability be less than the original term of the loan.

## **7.15. Match Requirements**

Per federal regulation, the expenditure of HOME funds will accrue a match obligation equal to twenty five percent (25%) of the amount of the HOME funds expended. The Commission looks to each project receiving HOME funds to generate eligible match funds during the same fiscal year in which the HOME funds are expended. However, the Commission may cite previously reported match funds to satisfy HOME match requirements in subsequent years.

## **7.16. Other Federal Requirements**

In addition to the requirements outlined in this document, all awardees are required to adhere to federal rules, statutes, policies, and regulations associated with the underlying source of federal funds. Primary federal regulatory citations for the two funding sources (CDBG and HOME) are listed below:

1. CDBG: 24 CFR Parts 91 and 570
2. HOME: 24 CFR Parts 91 and 92



### **7.17. HOME Projects Sponsored by a member of the HOME Consortia**

Each year, members of the HOME Consortia may present for consideration by the Committees projects that a particular member wishes to sponsor. These projects may be brought forward by a member rather than by a private housing developer. Projects are subject to the same threshold and selection criteria as any other project during the Selection Process.

### **7.18. Use of HOME funds for the Commission's Tenant-based Rental Assistance Program**

The Sonoma County Community Development Commission uses HOME funds for Tenant-Based Rental Assistance (TBRA) as a tool to help very low- and extremely low-income households access permanent housing. Commission staff will make recommendations to the Community Development Committee and Cities and Towns Advisory committee regarding the appropriate amount for funding and the ranking compared to other proposed uses of HOME funds. The Commission will not submit an application for TBRA funds through the NOFA process since it is operated internally by the Commission, but any recommendation by staff will be subject to the same threshold and selection criteria as other applicant projects, and a staff report will be prepared for committee consideration.

### **7.19. Use of CDBG funds for the Commission's Single-Family Housing Rehabilitation Program**

The Sonoma County Community Development Commission uses CDBG funds for single-family (up to 4 units) housing rehabilitation as a tool to help low- and very-low-income households retain decent housing that is affordable to them. This program is key to retaining existing housing stock in the County. Commission staff will make recommendations to the Community Development Committee and Cities and Towns Advisory committee regarding the appropriate amount for funding and the ranking compared to other proposed uses of CDBG funds. The Commission will not submit an application through the NOFA process for the Housing Rehabilitation Program since it is operated internally by the Commission, but any recommendation by staff will be subject to the same threshold and selection criteria as other applicant projects, and a staff report will be prepared for committee consideration.

### **7.17-7.20. Fair Housing-Related Services and Set-Aside Funding**

Each jurisdiction receiving CDBG funds from HUD must certify that it will affirmatively further fair housing, which means it will conduct an Assessment of Fair Housing or the Analysis of Impediments within the jurisdiction and take meaningful actions to achieve a material positive change that affirmatively furthers fair housing. To remain eligible for CDBG funding, adequate funding for a range of Fair Housing-related services must be provided through a Set-Aside under the Public Services category. Developing a Fair Housing program that meaningfully furthers fair housing is the responsibility of the Commission's advisory body, the Community Development Committee, in its CDBG oversight role.

For FY 2020-2021, the Commission will use 100% of its Public Services Set-aside to fund a Fair Housing and Housing Justice Program. Subrecipients may be selected through a NOFA process, or staff may recommend maintaining the current subrecipients through an extension and/or expansion of the currently funded one-year subrecipient agreements.

A Fair Housing and Housing Justice Program is an important Upstream Investment that can prevent people from becoming homeless. Because people served by this program do not enter the homeless system of care, the funding is not governed by HOME Sonoma County, the governing body for Sonoma County's homeless system of care.

7.17.1-7.20.1. Other Requirements of the Fair Housing and Housing Justice Program

~~The NOFA solicits proposals from capable nonprofit agencies to provide fair housing-related services that implement the recommended actions in the 2011 Analysis of Impediments.<sup>10</sup> The Commission shall endeavor to join with other entitlement jurisdictions within Sonoma County (Petaluma and Santa Rosa) in the NOFA process to provide consistent and cost-effective service and assistance to citizens of the entire County.~~

~~Eligible Fair Housing-related services that are part of a robust Fair Housing and Housing Justice Program may include but are not limited to:~~

~~address education about Fair Housing law; investigative testing and auditing; advocating for tenants who may be targets of discrimination; enforcement of Fair Housing law; as well as legal services designed to prevent eviction. -Note: new for the FY 2019-2020 funding cycle is the inclusion of eviction prevention legal services in the Fair Housing category.~~

7.20.2.-Fair Housing Provider Selection Process (multiple proposals)

- ~~➤ In the event that there are multiple proposals for providing fair housing services, a committee made up of staff members of each jurisdiction will recommend appropriate Fair Housing-related services based on the following factors:~~
  
- ~~➤ The capacity of the applicant to provide these services.~~
- ~~➤ The degree to which a capable applicant can leverage additional funding sources to augment the County's funding allocation.~~
- ~~➤ Coordination with neighboring jurisdictions in the regional provision of fair housing services for optimizing efficiency and customer -service~~
  
- ~~➤ Cost-effectiveness.~~
- ~~➤ The degree to which the proposed services will implement meaningful actions to achieve a material positive change that affirmatively furthers fair housing, or that addresses recommended actions in the current Analysis of Impediments to Fair Housing Choice.~~
  

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- ~~➤ In the event no viable proposals are received from community-based non-profit agencies or no fair housing proposals are awarded funds, Commission staff will provide the required fair housing services utilizing funding from the Fair Housing Set Aside Public Services Set-aside until which time that a subsequent RFP process can be implemented to secure a qualified contract provider of Fair Housing-related services.~~

#### 7.20.3.7.17.4.—Fair Housing Set-aside

The set-aside amount for all Fair Housing-related services shall be \$\_\_\_\_\_100% of the 15% Public Services Set-aside subject to adequate funding. If the Community Development Committee recommends a change to the set-aside amount for any fiscal year, the following factors will be considered:

- i. Current funding level for CDBG funding.
- ii. Historical funding levels of selected services.
- iii. Expected cost of activities required to take the recommended actions identified in the analysis of impediments to fair housing choice document.
- iv. Consideration of actual or potential funding from other sources.

## **8. PROJECT SELECTION**

### **8.1. Application Submission Process**

Details regarding the application requirements and time-lines are included in the Notice of Funding Availability (NOFA) released in late-October to mid-November of each year for the fiscal year that begins the following July.

**All applicants should attend a Technical Assistance Session for interested applicants to be held on the date listed on the FY 202019-20210 Funding Timeline. Any applicant who cannot attend the scheduled Session should contact the Commission staff as soon as possible.**

Applicants must submit funding applications to the Commission by 5:00 p.m. on the date listed on the FY 202019-20210 Funding Timeline. Project applications must be complete by the deadline date to be considered eligible for funding. Required application contents differ by allocation category; please refer to the NOFA for specific requirements. Applications ~~that~~<sup>which</sup> do not include all applicable requested documents or complete answers to all applicable questions, will be deemed ineligible for funding.

Applications may not be revised and/or submitted after the deadline date. In addition, once a project or program is awarded funding by the Commission it cannot be materially revised prior to contract execution.

### **8.2. Selection Process**

Note: See the FY 2019-2020 Funding Timeline for selection process dates.

8.2.1. Community Development Committee and ~~Technical Advisory~~Cities and Towns Advisory Committee Workshop

The Sonoma County Community Development Committee (CD Committee) appointed by the Board of Supervisors and the ~~Technical-Cities and Towns~~ Advisory Committee comprised of one appointed representative from each of the seven incorporated jurisdictions in the Urban County are responsible for reviewing all applications concurrently.

The CD Committee and Technical Advisory Committee conduct a concurrent annual public workshop to review staff analysis of applications submitted under the ~~the~~ competitive funding categories, take testimony from applicants, and to provide feedback to staff that will be integrated into staff recommendations in the Draft Annual Action Plan.

**The committees will not recommend funding for any project unless a representative from the applicant agency is present at the workshop to answer questions about the proposed project.**

8.2.2. Discretion of Commission Staff

Staff will have some discretion in determining if CDBG or HOME funds are best for a project or if a project would be better suited for non-federal funds. Giving staff discretion will ensure maximum efficiency and effectiveness of limited local, state, and federal funds.

~~8.2.2~~8.2.3. Community Development Committee and Technical Advisory Committee Public Hearing

The Draft Annual Action Plan will be presented to both committees at a public hearing during the public comment period for the Action Plan. The Draft Action Plan will include a list of projects and programs recommended for funding. The committees will concurrently review the draft and finalize the recommendations to be made to the Board of Supervisors.

**The committees will not recommend funding for any project unless a representative from the applicant agency is present at the hearing to answer questions about the proposed project.**

~~8.2.3~~8.2.4. Tiebreaker Methodology

If the Committees are unable to come to a consensus about which projects should receive funding, a tiebreaker methodology will be used. The tiebreaker methodology will divide funding up based on two factors:

1. The percentage of low and moderate--income persons residing in each member jurisdiction of the Urban County and/or HOME Consortia.
2. Jurisdictions that have two years or more of unallocated CDBG funds will be considered ineligible to receive the proportional allocation of funds, because allocating funds to such a jurisdiction ~~may~~will place the Urban County at risk of

failing its “timeliness test.” Failing the timeliness test can result in a loss of CDBG funding from the U.S. Department of Housing and Urban Development.

#### 8.2.5. Selection of a “B” list of projects

The committees will include in their ranking process, a set of projects that could be funded if a project to which funds are originally awarded is delayed or cancelled. This will ensure flexibility and timely expenditure of funds.

### **8.3. Action Plan – One-Year Use of Funds**

The Commission will use the CD Committee and TAC recommendations to prepare the “Action Plan: One Year Use of Funds” to be included in the relevant Sonoma County Consolidated Plan. The Consolidated Plan Summary will be published/disseminated in accordance with HUD regulations and the Sonoma County Citizen Participation Plan. Per the Citizen Participation Plan, a review draft of the Consolidated Plan will be made available to the public for thirty days allowed for written comments to be submitted to the Commission. See the FY 2019-2020 Funding Timeline for the publication dates and the end of the comment period.

### **8.4. Board of Supervisors and Board of Commissioners Final Approval**

The Commission will submit the CD Committee and TAC recommendations, along with all written comments received during the Action Plan comment period and supplementary Commission staff comments, to the Board of Supervisors / Board of Commissioners for approval. The Board is the final decision-maker for determining CDBG and HOME awards. See the FY 2019-2020 Funding Timeline for the Board’s public meeting date.

## **9. THRESHOLD CRITERIA FOR PROJECT EVALUATION**

Applications must meet the following criteria to be eligible for consideration:

1. Is the application complete?
2. Is the proposed project an eligible activity per CDBG or HOME regulations?
3. If applying for CDBG funds, does the proposed project meet a CDBG National Objective?
4. Does the project Affirmatively Further Fair Housing?
5. Is the applicant an eligible applicant/sub-recipient/recipient per CDBG/HOME regulations?
6. Does the applicant demonstrate administrative capacity or request the assistance of the Community Development Commission to effectively deliver the proposed project? If the project requests assistance from the Commission, does the Commission make a determination that it can effectively deliver the required assistance to deliver the project while meeting the timeliness provisions in these policies?
7. *For homelessness-related projects only:* Will the project significantly impact HEARTH system-wide performance measures? Will it shorten the length of homeless episodes, decrease returns to homelessness, or increase placements in permanent housing?

8. *For homelessness-related projects only:* Does the project adhere to the principles of Housing First and participate in Coordinated Entry? If a homeless-serving housing project, does it accept referrals from Coordinated Entry?
9. For CDBG, does the project serve Urban County? For HOME affordable housing development, is the project located in a member jurisdiction of the HOME consortium?

## 10. **SELECTION CRITERIA**

The following criteria will be used in the evaluation of eligible applications and will influence the Commission's funding recommendations to the CD Committee. Capital Projects must meet all pre-award conditions, as is also the case for housing awards.

### 10.1. **Selection Criteria – All Projects**

#### 10.1.1. Funding Priorities

10.1.1.1. Projects will be ranked on how well they meet the following priorities:  
~~ranked in the order listed below:~~

~~10.1.1.1.~~10.1.1.2. Creation or Preservation of Affordable Housing

~~10.1.1.2.~~10.1.1.3. Infrastructure or Public Facility Supporting creation or preservation of affordable housing

10.1.1.4. Infrastructure or Public Facility supporting low or ~~moderate~~moderate- income populations

#### 10.1.2. Community Goals

Projects that meet the following community goals identified by the advisory committees will be ranked highly:

10.1.2.1. Projects that prevent displacement in high opportunity areas

10.1.2.2. Projects that alleviate the impact of climate change on low-income populations such as:

- infill development.
- infrastructure to reduce environmental impacts in LMA communities including bike lanes.
- walkable paths.
- electric vehicle charging infrastructure.
- ride share hailing locations.
- recycling water irrigation infrastructure.
- new energy-efficient housing construction.
  
- Projects that consider the mobility needs of low-income people, looking at a variety of factors, including:

- Improved linkages to public transportation
- Providing car-share options
- Supports people who work non-traditional hours
- Supports people with limited mobility who can't walk far or ride bikes
- Provides neighborhood safety that promotes walking and biking
- Projects that are aligned with local jurisdictions General Plan Climate Change Element & Equity Element

#### 10.1.2-10.1.3. Readiness to Proceed

The applicant demonstrates that the proposed project can spend grant funding within the applicable timeliness provisions (See Section 7.1). Requirements will vary by project type but may include demonstration of site control, completion of environmental review, approval of entitlements, etc.

For Housing Projects, projects demonstrating advanced readiness via (a) entitlements: (b) financing commitments; (c) permitting will rank highly.

#### 10.1.3-10.1.4. Need

Applicant describes the need for the project/program and demonstrates with applicable evidence (e.g., waiting list, census data, documentation of deteriorated conditions, etc.).

#### 10.1.4-10.1.5. Adherence to a competitive procurement process

Applicant adheres to a process wherein conversations outside an adopted competitive procurement process with members of either the Community Development Committee or Technical Advisory advocating for funding of applicant project or program will result in recusal of those members from the decision making process or ineligibility of that applicant project

#### 10.1.5-10.1.6. Financial Feasibility

The project adheres to guidance set out in the Notice of Funding Availability

#### 10.1.6-10.1.7. Outcomes

Applicant demonstrates that the project/program will result in outcomes that are clearly defined, measurable, and directly related to the alleviation of the stated problem

### **10.2. Selection Criteria – Housing Projects**

#### 10.2.1. Leverage

Projects that demonstrate funds will be leveraged against total development costs at least 7:1.

~~Priority will go to projects that leverage public funds to the greatest extent possible.~~

#### 10.2.2. Development Experience

Project developers who can demonstrate previous success obtaining federal tax credits and/or state funding to develop housing within the last seven years

#### 10.2.3. Support

Projects that can demonstrate existing support from other jurisdictions via letters of support, funding commitments, etc.

#### 10.2.4. Income and Population targeting

Housing projects with deep income targeting and special needs populations

### **10.3. Selection Criteria – Non-Housing Projects**

#### 10.3.1. Leverage and Meeting Community Need

Priority will go to projects that leverage public funds to the greatest extent possible or projects that meet a particular community need that cannot be met by other funding sources.

## **11. DEFINITIONS**

**Areas of Opportunity:** places where jobs are relatively plentiful and access to education, healthcare, and other amenities are close at hand.

**Community Development Block Grant Program (CDBG):** Created under the Housing and Community Development Act of 1974, this program provides grant funds to local and state governments to develop viable urban communities by providing decent housing with a suitable living environment and expanding economic opportunities to assist low- and moderate-income residents.

**CDBG Recipient:** a state, city, or urban county that receives a direct allocation of CDBG dollars from the U.S. Department of Housing and Urban Development. Through an urban county cooperation agreement, in the form of a Joint Powers Agreement the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Healdsburg, Rohnert Park, Sebastopol, and Sonoma together constitute a HUD-designated “Urban County.”

**CDBG Subrecipient:** Government agencies, private, or public non-profit organizations, including institutions of higher education and private for-profit entities, designated by the Urban County to undertake selected CDBG activities.

**Community Housing Development Organization (CHDO):** As defined by HUD, A private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a



CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, and capacity and experience.

**Continuum of Care (CoC):** The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments.

**Emergency Shelter Grant (ESG) Program:** A federal grant program designed to assist homeless persons through five activity types including Street Outreach, Emergency Shelter, Homeless Prevention, Rapid Re-housing, and HMIS.

**Fair Housing Act:** 1968 act (amended in 1974 and 1988) providing the HUD Secretary with fair housing enforcement and investigation responsibilities. A law that prohibits discrimination in all facets of the homebuying process on the basis of race, color, national origin, religion, sex, familial status, or disability.

**Fair Market Value:** The amount of money that would probably be paid for a property in a sale between a willing seller, who does not have to sell, and a willing buyer, who does not have to buy.

**HOME (HOME Investment Partnerships Program):** Provides formula grants to states and localities that communities use—often in partnership with local nonprofit groups—to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership, or to provide direct rental assistance to low-income people.

**HOME Participating Jurisdiction:** localities, metropolitan cities, urban counties or approved consortia that are eligible to receive an allocation of funds under the HOME program. Through an urban county cooperation agreement, in the form of a Joint Powers Agreement the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Healdsburg, Rohnert Park, Sebastopol, and Sonoma together constitute a participating jurisdiction.

**HOME Subrecipient:** A public agency or nonprofit organization selected by the participating jurisdiction to administer all or a portion of the participating jurisdiction's HOME program.

**HOME Owner, Developer, or Sponsor:** A non-profit or for-profit organization that will own, develop, or sponsor a HOME-assisted project.

**Homeless:** An individual who lacks a fixed, regular, and adequate nighttime residence; as well an individual who has a primary nighttime residence that is a supervised publicly or privately operated shelter designed to provide temporary living accommodations, an institution that provides a temporary residence for individuals intended to be institutionalized; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

**Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act:** Amended and reauthorized the earlier McKinney-Vento Homeless Assistance Act with substantial changes in 2009. It consolidated HUD's Continuum of Care grant programs and changed HUD's definition of homelessness and chronic homelessness.

**Homeless Prevention:** Activities or programs designed to prevent the incidence of homelessness, including, but not limited to: (1) short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices; (2) security deposits or first month's rent to permit a homeless family to move into its own apartment; (3) mediation programs for landlord-tenant disputes; (4) legal services programs that enable representation of indigent tenants in eviction proceedings; (5) payments to prevent foreclosure on a home; and (6) other innovative programs and activities designed to prevent the incidence of homelessness.

**Household:** All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.

**Housing Stock:** The number of existing housing units based on data compiled by the United States Bureau of the Census and referable to the same point or period in time.

**HUD:** The federal Department of Housing and Urban Development.

**Income Limit:** Determines the eligibility of applicants for HUD's assisted housing programs.

**Lead-Based Paint:** Paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight.

**Lease:** A written agreement between an owner and a family for the leasing of a decent, safe, and sanitary dwelling unit to the family.

**Low and Moderate Income Housing Asset Fund (LMIHAF):** Sonoma County's Low-and Moderate-Income Housing Asset Fund (assets from County of Sonoma, Cities of Sonoma and Sebastopol Redevelopment Successor Agencies).

**Market Value:** The most probable price that a property should bring in a competitive and open market, provided that all conditions requisite to a fair sale are present, the buyer and seller are knowledgeable and acting prudently, and the price is not affected by any undue stimulus.

**Microenterprise:** A commercial enterprise that has five or fewer employees, one or more of who owns the enterprise.

**Manufactured Home or Mobile Home:** A structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width, or 40 body feet or more in length, or which when erected onsite is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to 24 CFR 3282.13 and complies with the construction and safety standards set forth in this 24 CFR 3280. The term does not include any self-propelled recreational vehicle. Calculations used to determine the

number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected onsite. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b). **Racially and Ethnically Concentrated Areas of Poverty:** Census tracts where more than half the population is non-white and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area.

**Special Needs Subpopulations:** Include, but are not limited to: 1) elderly households, 2) persons with physical, mental or developmental disabilities, 3) persons with HIV/AIDS and their families, 4) large families, 5) single-headed households, and 6) farm workers.

**Uniform Relocation Act (URA):** The Uniform Act (or "Uniform Relocation Act"), passed by Congress in 1970, is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.

## 12. **MORE INFORMATION**

Visit the Commission's website to find more information: <http://www.sonoma-county.org/cdc>

## **APPENDIX A: ELIGIBLE USES OF FUNDS**

### **CDBG Eligible Activities**

<b><i>Consolidated Plan Goal Met</i></b>	<b><i>National Objective Code</i></b>	<b><i>CDBG Eligible Activity</i></b>	<b><i>Eligible Applicants</i></b>
Homelessness	LMC - homeless persons	All uses below as they relate to construction or rehabilitation of facilities to serve homeless households	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Acquisition of Property	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Rehabilitation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Solid Waste Disposal Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Flood Drainage Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Water/Sewer Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Street Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Sidewalks	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Tree Planting	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Homeless Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Health Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Shelter for persons with special needs	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Group homes for people with developmental delays	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Battered Spouse Shelters	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Abused or Neglected Children Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Facilities for AIDS Patients	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Asbestos Removal	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Relocation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Rehabilitation Administration	Governmental Agency or Non-profit

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Homelessness	LMC - homeless persons	Nonprofit Capacity Building - provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more for the basic eligibility categories under the CDBG program	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Operation and Repair of Foreclosed Property	Governmental Agency or Non-profit
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.	LMH	New housing construction - only as "are clearly needed to address a lack of affordable housing accessible to existing or planned jobs"	Community Based Development Organization (CBDO)
Affordable Housing	LMH	Homeownership Assistance - can include subsidizing interest rates, financing acquisition, mortgage insurance premiums, closing costs, down payment assistance	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation - Single family: repair directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of existing structures, installation of security devices, including smoke detectors and dead bolt locks, and renovation through alterations, additions to, or enhancements of existing structures and improvements, abatement of asbestos hazards (and other contaminants) in buildings and improvements that may be undertaken singly or in combination.	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation - Multi-family: repair directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of existing structures, installation of security devices, including smoke detectors and dead bolt locks, and renovation through alterations, additions to, or enhancements of existing structures and improvements, abatement of asbestos hazards (and other contaminants) in buildings and improvements that may be undertaken singly or in combination.	Governmental Agency or Non-profit

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing	LMH	Acquisition for Rehabilitation of Housing	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation Administration - Rehabilitation services, such as rehabilitation counseling, energy auditing, preparation of work specifications, loan processing, inspections, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in rehabilitation activities.	Governmental Agency or Non-profit
Affordable Housing	LMH	Lead Based Paint/Hazards Test/Abatement	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Services - costs in support of activities eligible for funding under the HOME program. This includes services such as housing counseling in connection with TBRA and Affordable housing projects, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, management of TBRA, other services related to assisting owners, tenants, contractors and other entities participating or seeking to participate in the HOME program. Such assistance must also meet HOME income targeting requirements.	Governmental Agency or Non-profit
Affordable Housing	LMH	All Uses below as they relate to construction or rehabilitation of housing affordable to low-income households:	
Affordable Housing	LMH	Acquisition of Real Property	Governmental Agency or Non-profit
Affordable Housing	LMH	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Affordable Housing	LMH	Solid Waste Disposal Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Flood Drainage Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Water/Sewer Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Street Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing	LMH	Sidewalks	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Tree Planting	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Affordable Housing	LMH	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Affordable Housing	LMH	Relocation	Governmental Agency or Non-profit
Affordable Housing	LMH	Rental Income Loss - Payments to housing owners for losses of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by CDBG eligible activities.	Governmental Agency or Non-profit
Affordable Housing	LMH	Energy Efficiency Improvements - includes installation of storm windows and doors, wall and attic insulation, and conversion, modification or replacement of heating and cooling equipment, including the use of solar energy equipment.	Governmental Agency or Non-profit
Affordable Housing	LMH	Residential Historic Preservation - authorizes the costs of preserving or restoring properties of historic significance that will be used for housing for low-income households.	Governmental Agency or Non-profit
Affordable Housing	LMH	Nonprofit Capacity Building - provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Affordable Housing	LMH	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more of the basic eligibility categories under the CDBG program	Governmental Agency or Non-profit
Affordable Housing	LMH	Operation and Repair of Foreclosed Property - authorizes activities necessary to make essential repairs and payment of operating expenses needed to maintain habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low income neighborhoods.	Governmental Agency or Non-profit

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Non-Housing Community Development - Infrastructure systems and public facilities	various	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Public Facilities or Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Senior Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Handicapped Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Youth Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Neighborhood Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Parks, Recreational Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Parking Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Solid Waste Disposal Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Flood Drainage Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Water/Sewer Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Street Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Sidewalks	Governmental Agency or Non-profit
Non-Housing Community Development -	various	Child Care Centers	Governmental Agency or Non-profit



<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Infrastructure systems and public facilities			
Non-Housing Community Development - Infrastructure systems and public facilities	various	Tree Planting	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Fire Station/Equipment	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Health Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Abused or Neglected Children Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Asbestos Removal	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Facilities for AIDS Patients	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Relocation	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Rental Income Loss - Payments to housing owners for losses of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by CDBG eligible activities.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Privately Owned Utilities - acquire, construct, reconstruct, rehabilitate or install distribution lines and facilities of privately owned utilities, including the placing underground of new or existing distribution facilities and lines.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Rehabilitation of Public or Privately Owned Commercial/Industrial buildings - some limitations for buildings owned by private for-profit business	Governmental Agency or Non-profit
Non-Housing Community Development -	various	Rehabilitation Administration: Rehabilitation services, such as rehabilitation counseling, energy	Governmental Agency or Non-profit

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Infrastructure systems and public facilities		auditing, preparation of work specifications, loan processing, inspections, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in rehabilitation activities.	
Non-Housing Community Development - Infrastructure systems and public facilities	various	Non-Residential Historic Preservation - authorizes the costs of preserving or restoring properties otherwise eligible as Public Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Renovation of closed buildings - such as closed school buildings, for use as an eligible public facility	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	LMA or, if not applicable: LMC	Public Facility or improvements access projects that remove of material or architectural barriers that limit the accessibility of elderly persons or adults with severe disabilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	LMA, LMJ, or, if neither apply: LMC	Rehabilitation of a privately owned nonresidential building or improvement that removes material or architectural barriers that limit the accessibility of elderly persons or adults with severe disabilities	Governmental Agency or Non-profit
<del>SUSPENDED FOR FY 19-20 Non-Housing Community Development - Micro enterprise</del>	<del>various</del>	<del>Micro Enterprise Assistance: providing credit, including, but not limited to grants, loans, loan guarantees, and other forms of financial support, for the establishment, stabilization and expansion of microenterprises; providing technical assistance, advice and business support services to owners of microenterprises and persons developing microenterprises; providing general support including but not limited to peer support programs, counseling, childcare, transportation and other similar services to owners of microenterprises and persons developing microenterprises.</del>	<del>Governmental Agency, Non-profit or for-profit</del>
Non-Housing Community Development - Infrastructure systems and public facilities/ Non-Housing Community Development - microenterprise	various - must match eligible use	Nonprofit Capacity Building: provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities/ Non-Housing Community Development - microenterprise	various - must match eligible use	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more for the basic eligibility categories under the CDBG program	Institution of Higher Education (Secondary and above)

## HOME Eligible Activities

<b>Consolidated Plan Goal Met</b>	<b>HOME Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing and possibly Homelessness	Rental Assistance (Assistance to Developers of Rental Housing).	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Minimum set-aside of 15% for CHDOs. All development or TBRA expenses are eligible.	Community Housing Development Organizations
Affordable Housing and possibly Homelessness	New Construction: costs to meet applicable new construction standards	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Rehabilitation: To meet minimum property standards or to make essential improvements, including energy-related repairs or improvements, improvements necessary to permit use by persons with disabilities and the abatement of lead-based paint hazards. Rehabilitation includes conversion within the existing footprint of a building.	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Demolition of existing structures, associated with both new construction and rehabilitation	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Utility connections including off-site connections from property line to adjacent street, associated with both new construction and rehabilitation	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Improvements to project site in keeping with improvements of surrounding standard projects including on-site roads, and sewer and water lines.	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Refinancing for rehabilitation projects to permit continued affordability	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Acquisition: May use HOME funds to cover the costs of acquiring improved or unimproved real property	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Project Related Soft Costs reasonable and necessary costs associated with financing or development of new construction, rehab or acquisition including: Architectural, engineering or related services, costs to process or settle financing, cost of a project audit, costs to provide information services, cost of funding an initial operating deficit reserve, PJ staff and overhead costs directly related to carrying out the project, developer impact fees, costs of environmental review	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Relocation associated with development or rehabilitation of units	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project,

<b>Consolidated Plan Goal Met</b>	<b>HOME Eligible Activity</b>	<b>Eligible Applicants</b>
		including Community Housing Development Organizations
Affordable Housing and likely Homelessness	Tenant-Based Rental Assistance	Public agency or nonprofit organization
Affordable Housing and possibly Homelessness	CHDO Operating Costs - An individual CHDO may be used for operating costs of CHDO(s). An individual CHDO may receive no more than the lesser of 50% of its total operating costs or \$50,000. These funds are not part of the CHDO Set-Aside. These funds may be used for general operating assistance and may not be used or costs eligible under the CHDO Set-Aside.	Community Housing Development Organizations

## **APPENDIX B: INCOME LIMITS**

~~Effective July 1, 2018~~

These income limits apply to HOME Investment Partnership Program (HOME) and Community Development Block Grant Program (CDBG) projects and programs, and apply only to Sonoma County Community Development Commission-assisted projects or programs. They are not to be used as a guide for programs regulated by any agency other than the Sonoma County Community Development Commission. It is up to each property owner to determine which regulations preside if a program is regulated by more than one program.

Current Income Limits are found on the CDC website at the following link: <http://sonomacounty.ca.gov/CDC/Housing-and-Neighborhood-Investment/Income-and-Rent-Limits/#federal>

Persons in Household	30% AMI*	Very Low Income 50% AMI (HOME Low)	60% AMI	Low Income 80% AMI (HOME High)
1	20,650	34,400	41,280	55,000
2	23,600	39,300	47,160	62,850
3	26,550	44,200	53,040	70,700
4	29,450	49,100	58,920	78,550
5	31,850	53,050	63,660	84,850
6	34,200	57,000	68,400	91,150
7	36,550	60,900	73,080	97,450
8	38,900	64,850	77,820	103,700

**\*Area Median Income (AMI) for a 4-person household: \$84,100**

## **APPENDIX C: RENT LIMITS**

~~Effective July 1, 2018~~

These rent limits apply to HOME Investment Partnership Program (HOME) and Community Development Block Grant Program (CDBG) projects and programs, and apply only to Sonoma County Community Development Commission-assisted units. They are not to be used as a guide for projects regulated by any agency other than the Sonoma County Community Development Commission. It is up to each property owner to determine which regulations preside if a unit is regulated by more than one program.

Property owners must subtract from the maximum rent the approved utility allowance for any utilities that the tenant pays in addition to the rent. Confirm the appropriate utility allowance with the Sonoma County Community Development Commission.

Current Rent Limits are found on the CDC website at the following link:  
<http://sonomacounty.ca.gov/CDC/Housing-and-Neighborhood-Investment/Income-and-Rent-Limits/#federal>

Rent Level	Studio	One-bedroom	Two-bedroom	Three-bedroom	Four-bedroom
<b>Low (Very Low-Income, 50% AMI*)</b>	860	924	1,105	1,276	1,425
<b>High (Low-Income, 65% AMI)</b>	1,098	1,178	1,416	1,627	1,795
<b>*Area Median Income (AMI) for a 4-person household: \$84,100</b>					



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

*Members of the Commission*

**David Rabbit**  
Chair

**Susan Gorin**  
Vice Chair

**Shirlee Zane**  
**James Gore**  
**Lynda Hopkins**

**Geoffrey M. Ross**  
Executive Director

MEMORANDUM

Date: October 16, 2019

To: Community Development Committee & Cities and Towns Advisory Committee

From: Felicity Gasser, Federal Funding Administrator

Subject: Agenda Item 6: Public Hearing – Action Plan Amendment

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**Background**

As the Commission approaches the six-month mark before its annual CDBG timeliness test, staff is beginning to evaluate current project spending to make a determination of whether action is needed to ensure that the Urban County<sup>1</sup> passes this important timeliness test. The timeliness test requires that as of April 30, the balance of unspent CDBG funds, including any program income, is no more than 1.5 times the current year’s allocation of funds. If the timeliness test is failed, there is a high risk that HUD will recapture the unspent funds that are over the cap.

**Current Status**

Despite reprogramming of funds in early 2019 and awards made to projects that could spend funds quickly in the FY 2019-2020 funding rounds, there are still some stalled projects remaining as the Commission transitions to the new model of prioritizing awards to projects that can spend funding quickly.

Attached to this memo is a chart of all projects that have received awards but are not yet complete. An assessment of each project on this list to determine how quickly it can use its award will be completed in the coming weeks to determine where reprogramming is needed to position the Commission to pass its timeliness test.

In a high construction cost market, there are some previously funded projects that are coming in over budget and the previous award of CDBG funds are now inadequate.

At the September 18, 2019 concurrent meetings of the Community Development Committee and the Cities and Towns Advisory Committee a recommendation was made to prepare an Action Plan amendment to go before the Board in early October with a recommendation to reprogram funds as appropriate. This amendment is slated to go before the Board of Supervisors on October 22<sup>nd</sup>.

Pursuant to the requirements of the Community Development Commission Citizen Participation Plan, the draft Action Plan Amendment must be published for a 30-day comment period and a public hearing must be held to receive oral public comment. Today’s public hearing meets that

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<sup>1</sup> The Urban County is comprised of unincorporated Sonoma County, the Cities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, and Sonoma and the Town of Windsor, who form a CDBG entitlement jurisdiction and a HOME Consortia under a Joint Powers Agreement entered into every three years.



requirement, and the Committees are to receive public comment on the proposed Action Plan Amendment. Any comments received will be used to inform the final Action Plan Amendment recommendation to the Board, and will be submitted to HUD.





# County of Sonoma

## State of California

Date: October 22, 2019

Item Number: \_\_\_\_\_

Resolution Number: \_\_\_\_\_

4/5 Vote Required

### Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California,

**Whereas**, a condition of receiving housing and community development funds from the U.S. Department of Housing and Urban Development, the Board of Supervisors approved the 2015 Consolidate Plan on May 5, 2015 which describes the community development priorities for the County, and

**Whereas**, the Board of Supervisors approved the One Year Action Plan for FY 2019-2020 on April 30, 2019 that provides community development funding to be invested in activities that directly support the adopted priorities in the 2015 Consolidated Plan, and

**Whereas**, the County is assessed each year by the U.S. Department of Housing and Urban Development (HUD) on May 2<sup>nd</sup> for timely spending each year and must have no more than 1.5 times its current funding year allocation in accumulated unspent funds funds as of that date, and

**Whereas**, the following list of projects received funding awards in previous years:

- **2015**
  - *Regional Parks – Maxwell Farms ADA*
- **2016**
  - *Cloverdale Pedestrian Safety Improvements*
  - *Cotati West School Street Path of Travel*
  - *Regional Parks – Helen Putnam Park*
  - *Rohnert Park - ADA Transition Plan*
  - *Windsor Starr Rd Sidewalk Phase 3*
- **2017**
  - *Cloverdale City Park ADA Improvements*
  - *Healdsburg ADA ramp retrofit project*
  - *Sonoma - ADA Transition Plan*
  - *Windsor Starr Rd Sidewalk Phase 4*
- **2018**

- SCCDC Housing Rehabilitation
- Sonoma County Affordable Housing, Inc. Riverfield Homes
- Cotati West - School Street Path of Travel
- Acquisition of 330 Hewett Street
- Environmental Review - 330 Hewett Street
- Sonoma County Regional Parks - Gualala Point ADA Retrofit
- City of Rohnert Park - Senior Center ADA Improvements
- City of Sebastopol - Park Village
- **2019**
  - Burbank Housing Sea Ranch Rehab
  - Disability and Legal Center Housing Access Modification Program
  - Catholic Charities Caritas Center
  - Healdsburg Sidewalk ADA
  - Sebastopol Bodega Ave ADA
  - Healdsburg Sidewalk ADA, and

**Whereas**, the cost of construction labor and materials continue to be elevated following the October 2017 fires, causing bids to come in over budget for some of the previously funded projects, and

**Whereas**, on a regular basis the County receives and reports on program income from repayment of loans made with Community Development Block Grant Program funds, that are estimated to be approximately \$200,000 between October 2019 and April 2020, and

**Whereas**, it is estimated that up to \$700,000 in additional funds will need to be reprogrammed in order to ensure timely spending, and

**Whereas**, there may be previously approved and funded projects in the above list that require additional funding to move forward and spend the funds that were awarded to them previously in a timely manner, and

**Now, Therefore, Be It Resolved**

The Board of Supervisors of the County of Sonoma approves the proposed FY 2019-20 Amended One Year Action Plan, including the award of up to \$900,000 *in reprogrammed Community Development Block Grant funds and Community Development Block Grant program income* to certain previously funded projects for which *additional funds are needed to be completed, and for such projects that are able to spend any additional awarded funds prior to the May 2, 2020 timely expenditure deadline.*

**Supervisors:**

Gorin:                      Zane:                      Gore:                      Hopkins:                      Rabbitt:

Ayes:                      Noes:                      Absent:                      Abstain:

**So Ordered.**