



2019/2020 Annual Action Plan



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Executive Summary

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

1. Introduction

Each year the U.S. Department of Housing and Urban Development (HUD) provides funding for housing and community development programs to the City of Santa Rosa (City), specifically Community Development Block Grant (CDBG), HOME Investment Partnerships Act (HOME), and Housing Opportunities for Persons with AIDS (HOPWA) funds. To receive these funds, the City must complete a report every three to five years called the Consolidated Plan.

The purpose of the Consolidated Plan is to identify a city or state's housing and community development needs, priorities, goals, and strategies, and to stipulate how funds will be allocated to housing and community development activities over the Consolidated Plan period. The current Consolidated Plan, amended in 2018 (Amended Consolidated Plan), covers the four-year period from 2016 – 2020. The City's Housing and Community Services Department (HCS) was the lead agency in developing the Amended Consolidated Plan and the subsequent Annual Action Plans.

The Amended Consolidated Plan and this Annual Action Plan (Action Plan) have been prepared in accordance with HUD's Office of Community Planning and Development (CPD) eCon Planning Suite launched in 2012, including the Consolidated Plan template in the Integrated Disbursement and Information System (IDIS).

This fourth year Action Plan details the activities the City will undertake to address the housing and community development needs and local objectives using CDBG, HOME, and HOPWA funds received during Program Year 2019/2020 consistent with the goals outlined in the Amended Consolidated Plan and in Section 2 below.

2. Summarize the objectives and outcomes identified in the Plan

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

The City has organized its priority needs according to the structure presented in HUD Regulations (24 CFR 91.215): affordable housing, homelessness, and non-housing community development. Priority is assigned based on the level of need that is demonstrated by the data collected during preparation of the Amended Consolidated Plan, specifically in the Needs Assessment and Market Analysis sections; the information gathered during the consultation and citizen participation



process; and the availability of resources to address these needs. Based on these components, housing needs are considered a high priority followed by homelessness and non-housing community development needs.

The City has seven goals to address these needs:

- Increase supply of affordable rental housing for the City's lowest-income households;
- Preserve existing affordable housing stock;
- Provide housing and services to special needs populations;
- Increase access to homeownership opportunities for City residents;
- Provide funding for public facilities and improvements;
- Promote economic development activities in the City; and
- Provide housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families.

In Fiscal Year 2019/2020, the City has been allocated \$1,427,595 in CDBG funding. CDBG funds are used for public services, housing activities, and administrative costs. CDBG program funds are used to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income. Funds can be used for a variety of activities including:

- Housing rehabilitation;
- Homeownership assistance;
- Lead-based paint detection/removal;
- Construction/rehabilitation of public facilities and infrastructure;
- Removal of architectural barriers;
- Public services;
- Rehabilitation of commercial/industrial buildings; and
- Loans/grants to businesses.

This action plan is for the City's CDBG entitlement directly from HUD. This action plan does not address the use of federal disaster recovery funds (CDBG-DR).

The City will receive an annual allocation of \$675,091 in HOME funding for Fiscal Year 2019/2020. HOME provides funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households, and can be used for activities that include:

- Building acquisition;



- New construction and reconstruction;
- Moderate or substantial rehabilitation;
- Homebuyer assistance; and
- Tenant-based rental assistance.

15% of HOME funds are allocated by regulation to community housing development organizations (CHDOs).

The City will receive an annual allocation of \$437,814 in HOPWA funding. HOPWA provides housing assistance and related supportive services to low-income persons living with HIV/AIDS and their families. Funds can be used for activities including, but not limited to:

- Acquisition, rehabilitation, or new construction of affordable housing units;
- Costs for facility operations;
- Rental assistance; and
- Short-term payments to prevent homelessness.

HOPWA funds may also be used for support services such as:

- Assessment and case management;
- Substance abuse and/or mental health treatment;
- Nutritional services;
- Job training and placement assistance; and
- Assistance with daily living.

3. Evaluation of past performance

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

The City prepares a Consolidated Annual Performance and Evaluation Report (CAPER) which outlines how the City met the needs and objectives outlined in the Amended Consolidated Plan and the prior year's Action Plan. The City will report on its 2018/2019 accomplishments in its 2018/2019 CAPER, which is due to HUD in September 2019. The City's prior CAPERs can be found on its website.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.



The Plan process involved the housing and community development organizations in the City, nonprofit providers of affordable housing, service providers to the City's low-income and special needs populations, advocates, and others. Community meetings were held to present applicable findings and solicit public input on the draft 2019/2020 Action Plan on January 23, 2019, February 6, 2019, and February 27, 2019. To enhance public accessibility and participation, the February 6 meeting was held in a centrally-located community facility, the Person Senior Wing of the Finley Community Center.

Outreach was conducted to promote the February 6 meeting and the May 7 Public Hearing, including posting the bilingual (English/Spanish) notice to the City's website and Community Engagement Facebook page; in the Press Democrat and La Voz Bilingual Newspaper (online and print); email or mail distribution to the Sonoma County Continuum of Care, Community Advisory Board, various neighborhood associations, local businesses and social services agencies, individuals, and affordable housing developers. Consultation and citizen participation are discussed in greater detail in the Process section of this Plan.

5. Summary of public comments

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

Prior to the Public Hearing, the City received five comments from the public on this Plan, all suggesting that the City budget funds to connect South Wright Road and North Point Parkway. Copies of these comments received via email are attached to this Plan. The City received one additional comment at the Public Hearing on May 7, 2019. George Uberti commented that the public housing authority's federal fund expenditures were not consistent with federal regulations and that the Chief Financial Officer of Catholic Charities is not a CPA. The HOPWA program spends too much on administrative costs, and the CAPER lumps too many categories together.

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

All public comments have been accepted and are included herein.

7. Summary

- The City's population increased from 150,188 to 167,815 residents (approximately 14%) between the preparation of the 2009 - 2014 Consolidated Plan and the 2016 - 2020 Plan. According to the American Community Survey 2016 Population Estimate, the City's population was likely to increase to 175,155 in 2016. This estimate does not include



residents who, rather than rebuild after the October 2017 fires, chose to sell the sites of their former homes and relocate out of the area.

- According to the American Community Survey 2012 – 2016 5-Year Estimates, 69.8% of Santa Rosans were White, 2.2% were Black/African American, 1.7% were American Indian and Alaska Native, 5.2% were Asian, 0.57% were Native Hawaiian/Other Pacific Islander. Additionally, 31% of Santa Rosa’s population was Hispanic or Latino, and 13% were Some Other Race alone.
- Of the approximately 62,070 households, 24% were considered very-low income (this figure also includes the extremely-low income category), 17% low-income, 10% moderate income, and 49% above moderate income. Income categories are defined in the Needs Assessment.
- The City has sponsored the development of more than 4,000 affordable rental and homeownership units, including single family and multi-family residences, and housing for seniors and persons with special needs. Between July 1, 2016 and January 31, 2019, the period to date covered by the current Amended Consolidated Plan, the City provided more than \$8.9 million in financing for the development of 55 units which are in varying stages of development, including 48 home ownership units and seven units of housing for persons with special needs.
- A total of 2,996 homeless individuals were counted as part of Sonoma County’s 2018 point-in-time count, 64% of whom were unsheltered. The majority (97%) of the homeless population was comprised of people in households without children. 72% of the homeless population stated that the main obstacle to obtaining permanent housing was that they couldn’t afford rent, while 31% said the main obstacle was the lack of housing availability (Source: Sonoma County 2018 Homeless Census & Survey Comprehensive Report).
- In Santa Rosa, there are a total of 11 facilities for the homeless with 417 emergency shelter beds serving families, single adults, youth, and women with children. The City’s inventory also includes transitional and permanent supportive housing (discussed in greater detail in the Market Analysis).



- Many non-homeless individuals need supportive housing and services to enable them to live independently and avoid homelessness or institutionalization. These populations include the elderly, persons with physical, mental or developmental disabilities, persons with HIV/AIDS, victims of domestic violence, children leaving group homes or aging out of foster care, farmworkers, and substance abusers. In Santa Rosa and throughout Sonoma County, there are a wide variety of programs and services available to special needs populations.



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

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

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

Agency Role	Name	Department/Agency
Grantee – CDBG, HOME, HOPWA	City of Santa Rosa	Housing & Community Services

Table 1 – Responsible Agencies

Narrative (optional)

The City has delegated the responsibility for administering its housing programs to the Housing Authority of the City of Santa Rosa (Housing Authority) which is staffed by HCS. The mission of the Housing Authority is to ensure adequate, decent, safe, and sanitary housing for qualified people within Santa Rosa consistent with federal, state, and local law. HCS administers a variety of programs to revitalize blighted and economically disadvantaged areas; manage the distribution of Federal rental subsidy to low-income residents; conduct inspections related to City building and zoning codes, with an emphasis on health and safety issues; collaborate with other local government and non-profit agencies to provide services to our homeless residents; and develop and administer a variety of affordable housing programs. Key program areas include Code Enforcement, Rental Assistance, Neighborhood Revitalization, Mobilehome Rent Control, Homeless Services, and Santa Rosa Housing Trust (Trust). The Trust administers the City’s housing programs which are broken into four broad funding categories:

- Affordable Housing Production;
- Conversion and Preservation of Affordable Housing;
- Special Needs Facilities; and
- Homebuyer Finance.

The City and the Housing Authority have supported the development of more than 4,000 affordable rental and ownership units, including single and multi-family residences, and housing for seniors and persons with special needs. The Trust’s asset management and compliance portfolio exceeds \$119 million and includes 500 contracts and loans. More than 4,000 units are actively monitored for regulatory compliance annually.



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

1. Introduction

The consolidated planning process, including the annual action plan, requires jurisdictions to reach out to and consult with other public and private agencies when developing the Plan. The Plan itself must include a summary of the consultation process, including identification of the agencies that participated in the process. Jurisdictions also are required to summarize their efforts to enhance coordination between public and private agencies.

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

In preparation of the 2019/2020 Action Plan, the City consulted with various organizations located in Sonoma County that provide services to the residents of Santa Rosa. In many instances, these consultations are part of ongoing interactions between HCS and the agency or group described.

City of Santa Rosa

- **City Council** – Authorize (at a public hearing) the submission of this 2019/2020 Annual Action Plan to HUD.
- **City of Santa Rosa Planning and Economic Development Department (PED):** Reviews CDBG- and HOME-funded development projects to determine whether proposed development activities comply with the General Plan and Zoning Code; responsible for drafting the Santa Rosa General Plan 2035, adopted in 2009, including the Housing Element cited throughout the Amended Consolidated Plan and the 2019/2020 Action Plan as the Santa Rosa 2035 General Plan.
- **Housing Authority of the City of Santa Rosa (Housing Authority):** The policy board of Housing and Community Services, the Housing Authority addresses the housing needs of extremely low- and low-income residents in the City through a variety of programs including the Housing Choice Voucher Program (“Section 8”).
- **Community Advisory Board (CAB):** The Community Advisory Board connects city government with Santa Rosa residents to provide the public with a voice in decisions that impact their lives, thereby building a stronger community.



County of Sonoma

- **Sonoma County Community Development Commission (CDC):** coordinates the County's CDBG, HOME, and ESG funding, as well as the Continuum of Care process; provides funding to programs throughout the County including the Samuel L. Jones Hall Homeless Shelter located in Santa Rosa and owned by the City of Santa Rosa.
- **Sonoma County Department of Health Services – Behavioral Health Division:** provides information regarding the needs of Sonoma County residents who have mental disabilities. Representatives of this Division also participate in various Continuum of Care working groups.
- **Sonoma County Department of Health Services (Public Health Division):** provides information regarding the potential for lead-based paint hazards in the County.
- **Sonoma County Permit and Resource Management Department (PRMD):** responsible for drafting the Sonoma County General Plan Housing Element. PRMD and the CDC collaborate to implement County incentive programs intended to encourage the development of new affordable housing units in the unincorporated areas.

City of Petaluma

- **City of Petaluma:** participates with the City and CDC to develop and implement the annual Sonoma County Continuum of Care Plan. The three jurisdictions collaborated on the Analysis of Impediments to Fair Housing Choice (AI) in 2012 and will continue to collaborate on future fair housing analyses as required by HUD.

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

Significant aspects of the Plan development process included consultations with the CoC. Efforts to address the needs of homeless persons are described in greater detail later in this Plan.

The CDC is the lead agency for the CoC, recently rebranded Home Sonoma County, and hosts its planning process. The City, the CDC, and the City of Petaluma, the three HUD entitlement jurisdictions in Sonoma County, jointly fund the CoC and have designated seats on its governing body, a nine-member Leadership Council advised by a 25-member Technical Advisory Committee (TAC). TAC membership includes representation from the nonprofit, governmental, service provider, housing development, law enforcement, faith-based, business, homeless, and general communities. The CoC's 10-Year Homeless Action Plan and its annual submissions to HUD reflect



the demographics, needs, and available shelter, housing, and services in all three HUD entitlement jurisdictions to provide a cohesive shelter system throughout the County. The 10-Year Plan will likely be revised in 2019 to reflect the strategic priorities of Home Sonoma County.

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

The City of Santa Rosa does not coordinate ESG funds. However, as the largest city in the CoC, Santa Rosa has a seat on the CoC governing body and therefore participates in CoC consultation on allocation of County and Balance of State ESG funds and evaluation of ESG applications.

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



Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	California Human Development Corporation
	Agency/Group/Organization Type	Housing Services-Children Services-Persons with Disabilities Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committing to improving the quality of life for Sonoma County residents.
2	Agency/Group/Organization	California Programs for the Autistic
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Planning organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committed to enhancing the lives of adults in Sonoma County with autism and developmental delays.



3	Agency/Group/Organization	Catholic Charities of the Diocese of Santa Rosa
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committed to increasing quality of the lives of adults and children in Sonoma County.
4	Agency/Group/Organization	Community Action Partnership of Sonoma County
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committed to helping low income families and individuals achieve economic and social stability.



5	Agency/Group/Organization	Community Housing Sonoma County
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to increasing the supply of quality affordable housing in Sonoma County.
6	Agency/Group/Organization	Community Support Network
	Agency/Group/Organization Type	Housing Services-Children Services-Persons with Disabilities Services-Health Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to improving the quality of life for individuals with behavioral health challenges.

7	Agency/Group/Organization	Disability Services and Legal Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to providing education, community partnerships and advocacy for persons with disabilities.
8	Agency/Group/Organization	DAAC – Drug Abuse Alternatives Center
	Agency/Group/Organization Type	Services-Health Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to providing healthy alternatives for persons with substance abuse.
9	Agency/Group/Organization	Face to Face - Sonoma County AIDS Network
	Agency/Group/Organization Type	Housing Services-Persons with HIV/AIDS Regional organization



	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committed to enhancing the lives of persons with HIV/AIDS in Sonoma County.
10	Agency/Group/Organization	Fair Housing Advocates of Northern California
	Agency/Group/Organization Type	Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization committed to eliminating housing discrimination in Sonoma County.
11	Agency/Group/Organization	Habitat for Humanity of Sonoma County
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to increasing the supply of quality affordable housing in Sonoma County.



12	Agency/Group/Organization	Housing Land Trust of Sonoma County
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to increasing the supply of quality affordable housing in Sonoma County.
13	Agency/Group/Organization	Interfaith Shelter Network
	Agency/Group/Organization Type	Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to providing shelter to homeless persons and families.
14	Agency/Group/Organization	Legal Aid of Sonoma County
	Agency/Group/Organization Type	Services-homeless Regional organization



	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to preventing homelessness.
15	Agency/Group/Organization	The Living Room
	Agency/Group/Organization Type	Services-homeless Planning organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to preventing homelessness.
16	Agency/Group/Organization	Petaluma People Services Center
	Agency/Group/Organization Type	Services-Elderly Persons Services-homeless Services-Education Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to improving the quality of life of Sonoma County residents.
17	Agency/Group/Organization	Petaluma Ecumenical Properties (PEP)
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to increasing the supply of quality affordable housing in Sonoma County.
18	Agency/Group/Organization	Social Advocates for Youth
	Agency/Group/Organization Type	Housing Services-Children Regional organization Services- Counseling
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to reducing homelessness amongst at-risk youth.



19	Agency/Group/Organization	Sonoma County Continuum of Care
	Agency/Group/Organization Type	Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Other government - County Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization and its 30-member agencies were invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to coordinating housing and services funding for homeless families and individuals.
20	Agency/Group/Organization	Vietnam Veterans of California
	Agency/Group/Organization Type	Housing Services-homeless Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan



	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to preventing homelessness, providing housing, and offering counseling to Vietnam-era Veterans.
21	Agency/Group/Organization	Women’s Recovery Services
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-Health Services-Education Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to preventing homelessness and providing housing to women with children.
22	Agency/Group/Organization	YWCA of Sonoma County
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Regional organization
	What section of the Plan was addressed by Consultation?	Overall Plan



<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>This organization was invited to participate in the community meeting/public hearing. The anticipated outcome of the consultation was to improve coordination with a regional organization dedicated to providing affordable housing for abused women.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Sonoma County Community Development Commission	As the largest City in the CoC, Santa Rosa has a seat on the CoC governing body ensuring coordination with the CoC and consolidated planning process.
Consolidated Plan	Sonoma County Community Development Commission	As the largest City in Sonoma County, Santa Rosa must ensure coordination with Sonoma County's Consolidated Planning Process.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City conducted additional outreach by including all opt-in subscribers to the Continuum of Care’s email “listserv” in its informational mailings. The CoC’s listserv has approximately 250 subscribers and includes a variety of organizations and concerned residents.



AP-12 Participation – 91.105, 91.200(c)

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

To ensure maximum participation in the Annual Action Plan process among all populations and that issues and concerns are properly addressed, the City has developed a Citizen Participation Plan (CPP). The CPP describes actions to be taken to involve residents in the development of the Consolidated Plan, Substantial Amendments to the Consolidated Plan, the Annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER) and the Analysis of Impediments to Fair Housing (AI). The CPP is attached as an addendum to this Plan and can be found on the City's website. A summary of the components covered in the CPP is below:

1. Access to Meetings, Information, Records
2. Technical Assistance
3. Public Notices
4. Publication of Draft Documents
5. Public Hearings/Public Meetings
6. Public Comments
7. Availability of Final Documents
8. Response to Complaints
9. Process for Amendments to the Consolidated Plan

Efforts to Broaden Public Participation

Public Participation in the Annual Action Plan process is encouraged. In addition to publishing public notices in the Press Democrat, notices of public meetings/hearings were also published online by La Voz, a bilingual newspaper (English/Spanish). The City provides bilingual translators and signing or captioning services for the hearing impaired if requested. The sites utilized for all public meetings/hearings are Americans with Disabilities Act (ADA) compliant and near public transportation.



The City has broadened its outreach efforts through collaboration with the City’s Community Advisory Board (CAB), which connects city government with the city’s residents, so the public can have a voice in decisions that impact their lives and build a stronger community. CAB members, appointed by the City Council, were asked at their meetings on January 23 and February 27 to share information regarding the Annual Action Plan in their individual neighborhoods.

Increased social media outreach has been deployed using the Housing & Community Services Facebook page and cooperation of other City departments in sharing the HCS Facebook posts with their subscribers. The HCS page of the City website has recently begun to highlight housing-related news and featured a news items about the Public Services Application period and the Annual Action Plan. As previously mentioned, the City has included the CoC’s 250 listserv subscribers in its outreach.

Past outreach meetings were held in City Hall locations. For the current Action Plan process, the general outreach meeting was relocated to the Person Senior Wing of the Finley Community Center. The Finley Center, a large community gathering place, is centrally located and easily accessible via public transit.

The City continually finds ways to distribute program and project information to groups that are underserved. Information is available in Spanish for many programs and activities, including the Executive Summary section of this Plan. Both the AT&T Foreign Language Line and the TDD are utilized to ensure that information is available. The City’s website is available in 11 languages. There is also an ongoing requirement that the agencies receiving funds from the City utilize a variety of methods to reach the broadest population possible.



Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	Community Advisory Board (CAB): CAB is a 14-member advisory group comprised of citizen volunteers appointed by the City Council. Members either represent a specific district of the City or are at-large. Staff attended the CAB meetings on January 23 and February 27, 2019 to review the Annual Action Plan.	None.	None.	www.srcity.org
2	Public Meeting	Minorities Non-English Speaking - Specific other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The City hosted a public meeting on February 6, 2019 to allow the public to provide input on the proposed use of funds in the 2019/2020 Action Plan. The City also solicited public services funding applications.	None.	None.	www.srcity.org



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/broad community	The City held a public hearing on May 7 to allow the public to provide input on the proposed use of funds in the 2019/2020 Action Plan and to authorize the submission of the 2019/2020 Action Plan to HUD.	George Uberti commented that the public housing authority's federal fund expenditures were not consistent with federal regulations and that the Chief Financial Officer of Catholic Charities is not a CPA. The HOPWA program spends too much on administrative costs, and the CAPER lumps too many categories together.	None.	www.srcity.org
5	Newspaper Ad	Minorities Non-English Speaking - Special other language: Spanish Non-targeted/broad community	Notices for the February 6, 2019 community meeting were posted in the Press Democrat and La Voz Bilingual Newspaper (English/Spanish). A public notice of the May 7 public hearing was posted in the Press Democrat.	The City received five comments prior to the Public Hearing, all suggesting that the City budget funds to connect South Wright Road with North Point Road.	None.	www.srcity.org



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Internet Outreach	<p>Minorities</p> <p>Non-English Speaking - Special other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Notices of the Community meeting (in English and Spanish) were posted to the City's website, La Voz website, and the City's Community Engagement Facebook page. News items were added to the HCS and City homepages, and an article requesting public comment was published in the May issue of <i>City Connections</i> newsletter.</p>	None.	None.	www.srcity.org
7	Email and Mail	Non-targeted/broad community	<p>The notice of the community meetings was distributed via email or mail to the Sonoma County Continuum of Care (40+ agencies); City Council, Housing Authority, and Community Advisory Board; various neighborhood associations, local businesses and social service agencies, individuals, and affordable housing developers.</p>	None.	None.	www.srcity.org

Table 4 – Citizen Participation Outreach



Expected Resources

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

Introduction

The City received CDBG funding of \$1,426,436 in program year 2018/19. CDBG funds are used by the City for public services, housing activities and administrative costs. The City anticipates receiving an annual allocation of approximately \$500,000 in HOME funding for housing activities and administrative costs, although the FY 2018/19 allocation was \$729,539, which is a significant increase over prior years; 15% of the HOME funds are allocated to community housing development organizations (CHDOs). If the increased amount of HOME funding stays stable, the City expects to receive approximately \$2.2 million for the remainder of the Amended Consolidated Plan period. The City received HOPWA funding of \$433,139 in FY 2018/19. Anticipating similar amounts for the remainder of the Amended Consolidated Plan period, the City will receive approximately \$1.3 million. The table below provides a breakdown of these anticipated resources which are based on the actual 2019/20 allocations.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, Public Services	1,427,595	20,000	0	1,447,595	1,447,595	2019/2020 allocation + 2018/2019 estimated program income.



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public - Federal	Acquisition, Homebuyer assistance, Homeowner rehab, Multifamily rent new construction Multifamily rent rehab, New construction for ownership, TBRA	675,091	30,000	70,456	775,547	775,547	2019/2020 allocation + 2018/2019 estimated program income.
HOPWA	Public - Federal	Permanent housing in facilities, Permanent housing placement, Short term or transitional housing facilities STRMU, Supportive services, TBRA	437,814	0	0	437,814	437,814	2019/2020 allocation

Table 5 - Expected Resources – Priority Table

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

CDBG and HOME funds are often coupled with local funds which allow projects to compete for additional funding provided by tax credits, bonds, and state financing programs. An investment by the City makes the projects more competitive for various funding sources. All sources and types of funds are more limited now due to the current economic climate, along with the demise of statewide redevelopment tax-increment funds and housing set-aside funds. However, as in the past,



the City will be as creative as possible to find other sources of funding from local, state, federal, and private sources to develop and deliver efficient and cost-effective projects.

The City obtains its HOME Match funds from the property tax welfare exemption on properties that have received HOME funding from the City. As of Fiscal Year 2017/2018, there were 23 properties that contribute to the City's HOME Match requirement, which generated approximately \$1.3 million. The City reports annually on HOME match funds with the submission of its CAPER to HUD.

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

Not applicable.

Discussion

Not applicable.



Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicators
1	Production of affordable housing	2016	2020	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing Homelessness	HOME: \$222,514	Rental units constructed: 13 Household Housing Units
2	Preservation of affordable housing	2016	2020	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing Homelessness	CDBG: \$1,248,615 HOME: \$451,770	Rental units rehabilitated: 132 Household Housing Units
3	Housing and services to special needs populations	2016	2020	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Affordable Housing Homelessness Non-Housing Community Development	CDBG: \$198,980 HOME: \$101,264	Public service activities for Low/Moderate Income Housing Benefit: 2000 Households Assisted Rental units rehabilitated: 5 Household Housing Units
4	Homeownership	2016	2020	Affordable Housing		Affordable Housing		Homeowner Housing Added: 0 Household Housing Units
5	Public facilities and improvements	2016	2020	Non-Housing Community Development		Non-Housing Community Development		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons Assisted
6	Economic Development	2016	2020	Non-Housing Community Development		Non-Housing Community Development		Jobs created/retained: 0 Jobs



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicators
7	Housing and services for PLWH/A	2016	2020	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing Homelessness	HOPWA: \$437,814	Public service activities other than Low/Moderate Income Housing Benefit: 550 Persons Assisted
8	Tenant-based rental assistance (TBRA)	2018	2020	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing Homelessness	HOME: 0	Tenant-based rental assistance / Rapid Rehousing: 20 Households Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Production of affordable housing
	Goal Description	
2	Goal Name	Preservation of affordable housing
	Goal Description	
3	Goal Name	Housing and services to special needs populations
	Goal Description	
4	Goal Name	Homeownership
	Goal Description	
5	Goal Name	Public facilities and improvements
	Goal Description	
6	Goal Name	Economic Development
	Goal Description	
7	Goal Name	Housing and services for PLWH/A
	Goal Description	
8	Goal Name	Tenant-based rental assistance (TBRA)
	Goal Description	



Projects

AP-35 Projects – 91.220(d)

Introduction

As discussed in AP-20, the City has identified eight goals to address housing and community development needs during the Amended Consolidated Plan term of 2016 – 2020. Below are the proposed Fiscal Year 2019/2020 projects. Wherever possible, the City has identified specific projects, such as numbers 6 and 9 below. Projects selected throughout the course of the program year that have not yet been identified will fall under categories 3-5, 7, and 10, which are more like broad funding categories and align with the goals discussed in AP-20 and the Amended Consolidated Plan.

Projects

#	Project Name
1	HOME Administration
2	CDBG Administration
3	Production of Affordable Housing
4	Preservation of Affordable Housing
5	Community Housing Development Organizations (CHDOs)
6	Public Services - Homeless Service Center
7	2018-21 City of Santa Rosa CAH18F012 (SR)
8	2018-21 Face to Face CAH18F012 (F2F)
9	Public Services -Family Support Center
10	Tenant-Based Rental Assistance (TBRA)

Table 7 - Project Information

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

Priority is assigned based on the level of need that is demonstrated by the data collected during the preparation of the Amended Consolidated Plan, specifically in the Needs Assessment and Market Analysis, the information gathered during the consultation and citizen participation process, and the availability of resources to address these needs. Based on these components, housing needs are given the highest priority followed by homelessness and non-housing community development needs as more specifically discussed in the Strategic Plan Section of the Amended Consolidated Plan. One of the primary obstacles to meeting underserved needs of residents is the availability of funding. Changes to tax credit scoring and the limited amount of



state housing funds coupled with the loss of low- and moderate-income housing funds because of the dissolution of statewide redevelopment agencies continues to impact the City's ability to implement its goals. In the past, the City has included projects for lower priorities including public facilities and improvements, homeownership and economic development, however, for Fiscal Year 2019/2020, these projects have been removed because there is no funding allocated to them. Future funding for these projects depends on the availability of additional resources to address these needs.

The Housing Authority issues an annual Notice of Funding Availability (NOFA) to utilize its federal funds for affordable housing preservation, production, and rehabilitation.

The 2018/2019 NOFA was issued in July 2018 with applications due at the end of August 2018. The Housing Authority awarded \$2.4 million to Burbank Housing Development Corporation for the acquisition costs and conversion of an existing 56-unit market rate apartment development, Parkwood Apartments, to affordable housing, with 51 of the units being restricted. The Housing Authority also awarded \$1.3 million to Burbank Housing Development Corporation for Lantana Place Homes, a 48-unit affordable homeownership development targeting low- and moderate-income homebuyers.



AP-38 Project Summary

Project Summary Information

1	Project Name	HOME Administration
	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Production of affordable housing Preservation of affordable housing Housing and services to special needs populations
	Needs Addressed	Affordable housing, homelessness
	Funding	HOME: \$70,509
	Description	Production of affordable housing; Preservation of affordable housing; Housing & services to special needs populations
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	See description.
2	Project Name	CDBG Administration
	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Preservation of affordable housing Housing and services to special needs populations
	Needs Addressed	Affordable Housing Homelessness
	Funding	CDBG: \$289,519
	Description	P
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	See description.
	Project Name	Production of Affordable Housing

3	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Production of affordable housing Housing and services to special needs populations
	Needs Addressed	Affordable Housing
	Funding	HOME: \$175,995
	Description	Production of affordable housing; Housing & services to special needs populations
	Target Date	6/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	As many affordable units will be produced as feasible given the available resources. The City estimates providing assistance to approximately 50 affordable units per year through the production and preservation of affordable housing.
	Location Description	Citywide
	Planned Activities	See Estimate.
4	Project Name	Preservation of Affordable Housing
	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Preservation of affordable housing
	Needs Addressed	Affordable Housing Homelessness
	Funding	CDBG: \$959,096 HOME: \$357,323
	Description	Preservation of affordable housing through the rehabilitation of existing units, extension of affordability restrictions or conversion of market-rate units.
	Target Date	06/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	As many affordable units will be produced as feasible given the available resources. The City estimates providing assistance to approximately 50 affordable units per year through the production and preservation of affordable housing.
	Location Description	Citywide
	Planned Activities	See Estimate.

5	Project Name	Community Housing Development Organizations (CHDOs)
	Target Area	No target areas have been defined for the Annual Action Plan
	Goals Supported	Production of affordable housing Preservation of affordable housing Housing and services to special needs populations
	Needs Addressed	Affordable Housing Homelessness
	Funding	HOME: \$101,264
	Description	15% of HOME funds are set aside for CHDOs for affordable housing purposes, specifically for persons with special needs
	Target Date	06/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	As many affordable units will be produced as feasible given the available resources. The City estimates providing assistance to approximately 50 affordable units per year through the production and preservation of affordable housing.
	Location Description	Citywide
	Planned Activities	See Estimate
6	Project Name	Public Services - Homeless Service Center
	Target Area	No target areas have been defined for the Annual Action Plan
	Goals Supported	Housing and services to special needs populations
	Needs Addressed	Homelessness
	Funding	CDBG: \$102,520
	Description	Operation of a homeless day facility that provides showers, laundry, outreach, medical referrals, and intake for emergency shelters. Clients can also use the facility to receive mail and phone messages.
	Target Date	06/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,800 homeless individuals and families will benefit from this activity.
	Location Description	Citywide

	Planned Activities	See Estimate.
7	Project Name	2018-21 City of Santa Rosa CAH18F012 (SR)
	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Housing and services for PLWH/A
	Needs Addressed	Affordable Housing Homelessness Non-Housing Community Development
	Funding	HOPWA: \$13,134
	Description	Administration of the HOPWA Program.
	Target Date	06/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Countywide
	Planned Activities	See description.
8	Project Name	2018-21 Face to Face CAH18F012 (F2F)
	Target Area	No target areas have been defined for the Annual Action Plan
	Goals Supported	Housing and services for PLWH/A
	Needs Addressed	Affordable Housing Homelessness
	Funding	HOPWA: \$424,680
	Description	Provide housing assistance and related supportive services for low income persons living with HIV/AIDS and their families.
	Target Date	06/30/2019
	Estimate the number and type of families that will benefit from the proposed activities	Eligible beneficiaries are low-income (80% AMI or less) that are medically diagnosed with HIV/AIDS and their families. An estimated 350 people will benefit from this service.
	Location Description	Countywide.
	Planned Activities	See estimate.

9	Project Name	Public Services -Family Support Center
	Target Area	No target areas have been defined for the Annual Action Plan
	Goals Supported	Housing and services to special needs populations
	Needs Addressed	Homelessness
	Funding	CDBG: \$96,460
	Description	Provide homeless families with services including, but not limited to, emergency shelter, food, clothing, children's activities, medical and dental care, and client-focused family action plans to overcome homelessness.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	425 homeless families will benefit from this activity.
	Location Description	Citywide
	Planned Activities	See estimate.
10	Project Name	Tenant-Based Rental Assistance (TBRA)
	Target Area	No target areas have been defined for the Annual Action Plan.
	Goals Supported	Housing and services to special needs populations Tenant-based rental assistance (TBRA)
	Needs Addressed	Affordable Housing Homelessness
	Funding	HOME: \$0
	Description	Operation of TBRA Program.
	Target Date	06/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	See description.

AP-50 Geographic Distribution – 91.220(f)

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

The City’s federal funds are available citywide with no priority assigned to geographic regions. Instead, funds are allocated to organizations that provide low-income households with housing and supportive services. Every year the City prioritizes use of its CDBG and HOME funds for the development of affordable housing, including preservation and conservation, that serve low-income households, and to addressing homelessness. The City will prioritize HOPWA funding similarly; no priority will be assigned to geographic regions but rather to organizations that provide housing and services to low-income people living with HIV/AIDS.

Geographic Distribution – NOT APPLICABLE

Target Area	Percentage of Funds
NOT APPLICABLE	NOT APPLICABLE

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Not applicable.

Discussion

Not applicable.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One of the goals identified in the Amended Consolidated Plan and this Action Plan is the increase in the supply of affordable rental housing for the City's lowest income households. To achieve this goal, the City developed a Housing Action Plan (HAP) ordinance that was adopted by the City Council in 1992 to promote the development of affordable housing in Santa Rosa. The HAP ordinance applies to all residential development in the City and was most recently amended in 2012. Payment of fees to support the development of affordable housing is often the primary method of compliance. The City has also included an Infill Policy in the Housing Element of the General Plan. This Policy allows higher density construction with the creation of units targeted to low-income households for a minimum of 10 years. To assist developers of affordable housing units, the City issues tax-exempt multi-family housing revenue bonds to finance the construction of new development.

Between July 1, 2016 and January 31, 2019, the period to date covered by the current Amended Consolidated Plan, the City provided more than \$8.9 million in financing for the development of 55 units which are in varying stages of development, including 48 home ownership units and seven units of housing for persons with special needs. The City prioritizes its CDBG and HOME funds as well as local funding sources for affordable housing purposes. HOME-CHDO funds have often been combined with local resources to provide housing to special needs populations. When prioritizing the income levels to be assisted by the new affordable housing units, the City uses the Association of Bay Area Government (ABAG) Regional Housing Needs Allocation (RHNA) as a gauge.

In December 2017 the City adopted ordinances amending its Accessory Dwelling Unit (ADU) Zoning Code in compliance with state law and in support of the City's Housing Action Plan. ADUs are required to be owner-occupied and may not be rented for a period of fewer than 30 days, however, in lieu of the owner-occupancy restriction, the property owner may execute an affordability contract with the City. The affordability contract requires one of the units on the property to be rented to low-income households (80% or less AMI) at restricted rents.

The City updated its Density Bonus Ordinance in early 2019; the ordinance allows developers to build at a higher density in exchange for providing affordable units. Throughout the City, a 35% density bonus is available for eligible housing developments. Properties located in the Downtown Station Area Plan and the North Santa Rosa Station Area Specific Plan may be allowed up to a

100% density bonus for eligible housing developments.

One Year Goals for the Number of Households to be Supported:	
Homeless	0
Non-Homeless	50
Special-Needs	5
Total	55

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

One Year Goals for the Number of Households Supported Through:	
Rental Assistance	0
The Production of New Units	17
Rehab of Existing Units	33
Acquisition of Existing Units	0
Total	50

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

Discussion

Regarding affordable housing homeownership activities, the market has become increasingly difficult for low-income buyers due to a variety of factors including a shrinking inventory of affordably priced homes, competition from all-cash buyers bidding on the same homes, and the tightened credit market that has made it difficult for many potential homebuyers to obtain financing. This already tight, competitive market was worsened by the October 2017 wildfires that destroyed close to 5,300 homes in Santa Rosa, resulting in even higher demand for a small inventory of rental and purchase units. Despite these factors, the City hopes to continue its homeownership activities like its partnership with Habitat for Humanity and other developers and the projects listed below. However, because of the challenges noted herein, the City has prioritized its limited financial resources for affordable rental housing.

In recent years, the City has participated in the following notable homeownership projects.

Catalina Townhomes is a 60-unit self-help ownership development by Burbank Housing Development Corporation targeted to low-income households. The Housing Authority obtained a \$5 million Residential Development Loan Program (RDLP) loan for the California Housing Finance Agency (CalHFA) and approximately \$3.8 million in Building Equity and Growth in Neighborhoods (BEGIN) grant funds from the State of California Department of Housing and Community Development for the project, which began construction in 2014. Approved homeowners assisted

in the construction of their homes in exchange for a “sweat-equity” downpayment; sales began to close in late 2016. The development was fully occupied by June 2017.

Roundbarn Village will provide 237 homeownership units, with 12 restricted to moderate-income households. This project is currently being developed without need for Housing Authority or City funding assistance.

Harris Village, developed by Habitat for Humanity Sonoma County utilizing loans from the City and the Housing Authority, is a four-unit project combining the construction of three new single-family homes with the rehabilitation of an existing single-family home, all targeted to homeownership by low-income households.

Lantana Place Homes is a 48-unit homeownership project affordable to low- and moderate-income households. The project, which is being developed by Burbank Housing Development Corporation, will provide 25 units restricted to purchase by low-income households and 23 units restricted to purchase by moderate-income households. Construction is anticipated to start in June 2019.

Mortgage Credit Certificates (MCCs) provide an annual tax credit for first-time homebuyers, thus reducing the amount of federal income tax these homebuyers pay. The County of Sonoma and the participating municipalities of Cloverdale, Cotati, Healdsburg, Petaluma, Rohnert Park, Sebastopol, Sonoma, and Windsor sponsor a local MCC program that is available to eligible first-time homebuyers interested in purchasing a home anywhere in Sonoma County. The CDC administers the program through a consultant. MCC funds are provided by the California Debt Limit Allocation Committee (CDLAC) through an annual bond allocation process. Since 1993, more than 1,300 first-time homebuyers have received assistance under Sonoma County’s MCC program.

The tables in this section provide estimates on the number of homeless, non-homeless, and special needs households to be provided affordable housing during the program year 2019/2020 and the number of affordable units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units.

AP-60 Public Housing – 91.220(h)

Introduction

The City does not own or operate public housing units. As of February 2019, the Housing Authority has 1,887 Housing Choice Vouchers, including 414 HUD-VASH (Veterans Affairs Supportive Housing), and administers vouchers for approximately 200 families exercising portability from other jurisdictions. There are approximately 5,900 families on the waiting list and the wait is 8 to 10 years. The Housing Authority will open its waiting list in May 2020 and anticipates receiving 3,000 – 5,000 applications.

While the City does not provide public housing units, the units created with the funds allocated to affordable housing often include social services that are coordinated with organizations providing services throughout Sonoma County.

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

The Housing Authority does not own or operate any public housing units.

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

The Housing Authority's Resident Advisory Board, elected annually, includes two Tenant Commissioner members of the Housing Authority who participate in the development of Housing Authority policies and activities throughout the year. The Housing Authority provides homeownership resources to participants in the Housing Choice Voucher program and, more widely, to families in low-income areas in cooperation with the City's Neighborhood Revitalization Program. The Family Self-Sufficiency (FSS) Program has established partnerships with a variety of community resources to refer participants for services including pre- and post-secondary education, health care, child care, employment development, supported employment, and small business development that includes micro-loans. The FSS program also encourages families to participate in financial wellness programs including financial literacy and credit repair with an emphasis on long-term financial stability for the purposes of homeownership.

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

provided or other assistance

The Housing Authority has been designated a High Performing Agency from 2006 through 2017.

Discussion

n/a

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

Introduction

As discussed earlier in this Plan, the City participates in the Sonoma County Continuum of Care (CoC), which was formed by the cities of Santa Rosa and Petaluma, and the County of Sonoma in 1997. The goals and strategies outlined below are those of the entire region rather than for the City alone.

In 2018, Sonoma County's homeless system of care underwent a redesign of its governance structure and was rebranded as Home Sonoma County, a unified, countywide system aimed at aligning homeless services. Home Sonoma County's Leadership Council is the legislative body to this redesigned system, a nine-member Board, comprised of elected officials and community representatives and advised by a 25-member Technical Advisory Committee (TAC). The Leadership Council is responsible for setting the vision and direction to end homelessness in Sonoma County and serves as the CoC Board for federal and state competitive funding processes. The goal of HOME Sonoma County is to achieve "functional zero" homelessness in Sonoma County through utilization of a Housing First Strategy.

Home Sonoma County is designed to accomplish the following:

- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts to quickly re-house individuals and families who are homeless, which minimizes the trauma and dislocation caused by homelessness;
- Promote access to and effective use of mainstream programs; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

Home Sonoma County builds upon the foundation set in the 10-Year Homeless Action Plan 2014 Plan Update that ensured alignment with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, as well as with specific countywide policy initiatives. The 10-Year Homeless Action Plan will likely be revised in 2019 to reflect the strategic priorities of the new governance structure.

In Fiscal Year 2019/2020 Home Sonoma County will administer approximately \$14.2 million in combined annual and one-time federal, state, and local funding for homeless services in Sonoma County. Projects and programs funded through Home Sonoma County will collectively impact the following key System Performance Measures of the HEARTH Act, which governs all

federal and state homelessness funding:

- Decrease the length of homeless episodes;
- Increase placements in safe housing for those living outside and increase placements in permanent housing for all homeless persons;
- Reduce the percentage of people placed in permanent housing who return to homelessness;
- Decrease the number of people experiencing homelessness for the first time;
- Increase employment opportunities and incomes; and
- Reduce the total number of people experiencing homelessness in Sonoma County.

Home Sonoma County also aligns with existing strategies to achieve “functional zero” homelessness including the strategies established by the City. For example, the City’s Housing Action Plan sets forth a multi-faceted approach to achieve construction of “Housing for All,” including the construction of 2,500 affordable housing units and the continued support of homeless services. Additionally, the City’s Housing First Strategy directs that all homeless service resources and efforts be viewed and evaluated as part of a comprehensive community-wide program facilitating the transition of individuals and families experiencing homelessness into permanent housing. This means that all City funding considerations or initiatives (either directly or through third-party contracts, permitted uses, land use policies, etc.) that are devoted to providing a service to those experiencing homelessness shall be aligned with the federal and state Housing First model.

Describe the jurisdiction’s one-year goals and actions for reducing and ending homelessness including

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

- Operate Coordinated Entry for all households entering the homeless system and for unsheltered persons engaged by street outreach teams and at designated Coordinated Entry Access Points across the county. Reach out to homeless households (especially unsheltered persons) via the Homeless Outreach Services Team (HOST) and assess their individual needs with a common assessment tool; collect information to determine the underlying issues and risk factors and develop a plan to address those issues.
- Reduce recidivism through system-wide implementation of evidence-based practices known to effectively address trauma (e.g., Seeking Safety, Motivational Interviewing).
- Address the emergency shelter needs of people living outside through increased street

outreach and assessment of their health needs, prioritizing those most at risk of dying outside.

- Significantly expand rapid re-housing services to end homelessness as quickly as possible.
- Shift the entire homeless system of care to a “Housing First” approach as the most cost-effective and direct route to reducing homelessness.
- Help low-income households who are being discharged from publicly funded systems of care avoid becoming homeless by engaging those systems of care in identifying solutions for such households and planning to avoid new homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

- Expanding street outreach efforts to prioritize the needs of persons living outside, especially those whose health is compromised.
- Sustaining existing emergency shelter inventory and helping those in shelter exit to permanent housing through rental assistance and case management, addressing specific barriers to obtaining and retaining housing.
- Expanding economic opportunities to help participants achieve long-term housing stability by coordinating services with local employment training agencies to offer financial literacy workshops, or through local initiatives such as the CoC’s SOAR (SSI/SSDI Outreach, Access, and Recovery) Initiative. SOAR-trained case managers assist individuals experiencing homelessness with applying for SSI/SSDI.

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

Home Sonoma County’s Fiscal Year 2019/2020 Funding Policies established six project priorities, summarized below, aimed at helping vulnerable populations to attain and maintain housing.

- Creating new permanent supportive housing (PSH) units;
- Sustaining existing PSH projects and improving their capacity to serve the most

- vulnerable chronically homeless persons;
- Expanding Rapid Re-Housing (RRH) projects;
- Providing capital or operational investments in shelters, including Navigation Centers designed to serve the most vulnerable chronically homeless persons;
- Day centers and street/encampment outreach projects that currently serve, or may serve, as Coordinated Entry Access Points; and
- Homeless prevention or diversion projects that demonstrate improvements in housing stability among people at imminent risk of homelessness, or who have previously experienced homelessness.

Most families with children in the homeless service system, and those seeking to enter it, are screened with the evidence-based Vulnerability Index – Service Prioritization (VI-SPDAT) screening tool in use by Coordinated Entry. Households scoring in the 5 – 9 range are referred into RRH programs pending a full needs assessment. Currently RRH is a priority intervention for households with children. It is also being used to provide access to affordable housing for transition-aged youth and other adults-only households, especially in shared units. All local RRH programs require participation in case management, and case management is increased in the last several months as rental assistance decreases to ensure that the end of assistance does not cause a new episode of homelessness.

One critical function of all programs seeking to place homeless persons in rental housing is that of a housing locator. As vacancy rates remain low and rental prices continue to exceed the Fair Market Rent, the need for this role at the program level has become ever clearer. The Sonoma County Housing Authority, along with many local service providers, now utilizes housing location and navigation services. The City is providing local funding to staff positions at the Samuel L. Jones Hall Homeless Shelter, Family Support Center, and HOST program, which provide these specialized services. HOST also administers a Housing First Fund which provides landlord incentives and a risk mitigation pool to encourage landlords to rent to persons experiencing homelessness as well as resources to assist these individuals with move-in expenses and rental payments, including RRH rental assistance.

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

employment, education, or youth needs.

The CoC's discharge planning efforts are outlined in its annual application to HUD and include foster care, health care, mental health, and corrections. A detailed discussion on these efforts is included in SP-60 and summarized below.

Foster Youth: Sonoma County Division of Family, Youth and Children Services (FYC) is the lead agency responsible for ensuring foster youth are not routinely discharged into homelessness. FYC partners with Sonoma County Juvenile Probation to ensure foster youth in the criminal justice system have equal access to AB12-funded services (AB12 is a California law that extends foster care to age 21 in California); and works with community-based organizations such as VOICES Sonoma, Social Advocates for Youth (SAY), the Children's Village, and TLC Children's Services to implement programs that divert foster youth from the street. The CoC Homeless Youth Task Force, co-chaired by the Sonoma County Office of Education Foster/McKinney Coordinator, engages all these partners plus Sonoma County Divisions of Behavioral Health and Employment and Training, Buckelew Programs, Positive Images (serving LGBTQI youth), several police departments, and elected State officials in planning to prevent new discharges of foster youth to homelessness as well as conducting an annual Needs Assessment for homeless transition-aged youth.

Health Care: The CoC has worked with a grassroots Health Care for the Homeless Collaborative (HCHC), staffed by St. Joseph's Healthcare, to improve protocols for discharging homeless patients. Hospitals are now legally responsible for ensuring persons discharged from their care are not routinely discharged into homelessness. In Santa Rosa, these include Santa Rosa Memorial Hospital, Sutter Medical Center, and Kaiser Hospital. The three larger hospitals fund recuperative beds operated by Catholic Charities, the 13-bed Nightingale respite facility co-located with Santa Rosa Community Health Center's (SRCHC) drop-in Brookwood Health Center serving the homeless. SRCHC's Care Transitions program provides nursing visits and links multiply-disabled patients to a medical home and housing.

Mental Health: The discharge policies developed by the CoC with Sonoma County Behavioral Health (SCBH) represent a negotiated agreement that evolves over time and is supported by the County's culture of strong interdepartmental cooperative relationships and problem solving. SCBH has launched a Mobile Support Team that provides mental health support at law enforcement request. Santa Rosa Memorial Hospital's Emergency Department and many CoC partners have participated in HCHC planning for a chronic inebriate program in consultation with hospitals, psychiatric emergency services, detox, emergency medical transport, and

police.

Corrections: In 2011 California enacted Public Safety Realignment legislation that passed responsibility for low- to medium-risk offenders to County Probation Departments. Some of these probationers are housed with California Department of Corrections funds. As part of the County's strategy of Upstream Investments to reduce corrections costs, the County opened a Day Reporting Center and plans a Community Corrections center to house homeless probationers. The CoC is working with criminal justice partners to develop policies to avoid jail discharges to homelessness and convened a Law Enforcement Discharge Planning Group in 2015 to better coordinate discharge of individuals from jail and linkage with services from the adult probation department.

Discussion

AP-70 HOPWA Goals– 91.220 (I)(3)

One-year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	35
Tenant-based rental assistance	10
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	45

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

Introduction

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

Potential constraints to housing development in Santa Rosa vary by area. Prior to the October 2017 wildfires, these potential restraints generally included infrastructure, residential development fees, land use controls, development standards, development and building permit application processing times, and resource preservation. An analysis of these potential barriers is detailed in the Housing Element. A summary of the potential barriers identified in the Housing Element and is provided in the Market Analysis of the 2016 – 2020 Amended Consolidated Plan (MA-40). Additionally, the recommendations made in the Sonoma County Regional Analysis of Impediments to Fair Housing Choice (AI) completed in March 2012 can also be found in MA-40.

The October 2017 wildfires destroyed nearly 3,000 dwelling units in Santa Rosa with an additional 2,000 destroyed county-wide, for a total loss of approximately 5,300 dwelling units. The loss of so many units increased demand for a limited inventory of market-rate **and** affordable rental and ownership units.

The City has recently implemented priority processing through the Planning and Economic Development entitlement process for housing projects. Should developers choose to provide affordable housing, these projects receive an even higher priority in processing. Developers are being actively encouraged to take advantage of state and local density bonus provisions which provide development of a parcel at a higher level of density when the developer agrees to provide certain quantities of affordable housing.

The City is working closely with the CDC and the City of Petaluma to address the recommendations made in the 2012 AI within the budgetary constraints of each jurisdiction, including improving accessibility to fair housing information and resources on each jurisdictions' respective website and strengthening the capacity of the local fair housing agencies (both recommendations have been implemented). The City and the CDC will continue to collaborate on future fair housing analyses as required by HUD.

The City uses local funding sources to provide fair housing services for Santa Rosa and has used Fair Housing Advocates of Northern California for the past three fiscal years. The application period for Fiscal Year 2019/2020 coincided with that for public services providers. The application

received from Fair Housing Advocates of Northern California was judged through the lens of the 2012 AI. Fair Housing Advocates of Northern California is recommended to be the service provider for Fiscal Year 2019/2020.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction

Actions planned to address obstacles to meeting underserved needs

One of the primary obstacles to meeting residents' underserved housing needs is the lack of funding availability. The dissolution of statewide redevelopment agencies in 2012 continues to impact the City's ability to implement its affordable housing goals. However, a positive change in potential funding availability has been made to California's tax credit set-asides and apportionments. The change to the apportionment methodology redefined the geographic areas; rather than a large "Capital and Northern Region" that included 11 northern California counties, there are now two separate regions. Santa Rosa is part of the new Northern Region, which reduces the competition for tax credits against larger metropolitan areas like the Eastern Bay Area that includes Oakland, amongst other municipalities in Alameda and Contra Costa Counties. While the City actively seeks additional funding opportunities and will continue to do so, its ability to address underserved needs depends largely on the availability of additional resources.

Actions planned to foster and maintain affordable housing

As stated throughout this Action Plan and the 2016 – 2010 Amended Consolidated Plan, housing is a high priority. Accordingly, the City prioritizes the use of its CDBG and HOME funding to addressing homelessness, and for the development of affordable housing that serves low-income households, including preservation, conservation, and possibly TBRA. Over the course of Fiscal Year 2019/2020, the City anticipates providing financial assistance to approximately 50 affordable housing units and/or low-income families using HOME and CDBG funds and other resources available to the City.

Actions planned to reduce lead-based paint hazards

The City has addressed the issue of lead-based paint (LBP) hazards by providing notices to landlords and tenants that participate in the Housing Choice Voucher Program, borrowers/tenants of the City's Rehabilitation Loan Program, and homebuyers who used ADDI and CDBG funds, warning them of the hazards of LBP. All rental units rehabilitated with CDBG and HOME funds are subject to LBP compliance requirements. Through the creation of new affordable housing units, low-income households can reside in new housing units free of LBP hazards. In Fiscal Year 2019/2020, the City will use its HOME funding and approximately 85% of its CDBG funding for its

affordable housing programs. As a result, the units will be free of lead-based paint.

Actions planned to reduce the number of poverty-level families

The City hopes to reduce the number of poverty-level individuals and families by targeting CDBG, HOME, HOPWA, and local funds to projects that will provide affordable housing units and related services to foster self-sufficiency. The City does not have the resources or the capacity to increase the incomes of poverty-level persons, although the City does act to reduce the housing costs for these individuals utilizing the Housing Choice Voucher Program, CDBG-, HOME- and HOPWA-funded rental units and City-sponsored affordable housing units. All serve low-income residents.

Actions planned to develop institutional structure

The City has overcome gaps in its institutional structures by directing the Housing Authority, staffed by HCS, to provide policy guidance and administer the City's various housing programs. All affordable housing-related activities are administered by the Trust division of HCS which has the responsibility for coordinating the CDBG, HOME, and HOPWA programs in Santa Rosa and administering the funds. The City organization continually evaluates itself to determine better and more efficient ways to conduct business.

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

The City relies on private nonprofit organizations and for-profit developers to build and acquire, develop, and rehabilitate affordable units. The Housing Authority and HCS will continue to work closely with these entities to ensure that each year as many new, affordable units are produced as possible.

The City also relies on the nonprofit service sector to provide emergency shelter (including the 138 beds in the City-owned shelter), transitional, and special needs housing. The City will continue to support these organizations and their activities.

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

- | | |
|--|------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 00' |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 00' |
| 3. The amount of surplus funds from urban renewal settlements | 00' |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 00' |
| 5. The amount of income from float-funded activities | 00' |
| Total Program Income: | 00' |

Other CDBG Requirements

- | | |
|---|--------|
| 1. The amount of urgent need activities | |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 70.00' |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

Recapture provisions are based on 24 CFR 92.254(a)(5)(ii), which stipulates the conditions for the recapture of the HOME investment used to assist low-income families in purchasing a

home. Homebuyer recapture provisions are included in, or as a deed restriction rider, to the recorded deed of trust that secures a HOME loan Note. The provision requires recapture of funds if the home does not continue to be the borrower's principal residence or if all or any part of the property or any interest in it is sold, rented, conveyed, or transferred during the duration of the affordability period. Recapture provisions also require that only direct subsidy to the homebuyer is subject to recapture or shared equity, depending on the loan.

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

For HOME-funded affordable housing development projects, the City, through its Housing Authority, records a HOME Regulatory Agreement against the property that places a covenant and use restriction for 55 years. The covenant and use restriction is for the benefit and protection of the Housing Authority, enforceable by the Housing, and bind the current borrower, its successors, assigns, transferees, and future owner(s) of the property. The borrower agrees on behalf of itself, its successors and assigns, and each future owner of the property to adhere to all requirements of the HOME Program during the period of affordability. The requirements include, by way of example, but are not limited to:

1. Requirements related to rent limitations;
2. Requirements related to tenant income and any required reporting and certification requirements;
3. Requirements related to the provision of HOME Program-required tenant and participant protections; and
4. Requirements related to HOME Program nondiscrimination requirements and Affirmative Fair Housing marketing requirements.

For HOME-funded homebuyer assistance loans, the promissory note, deed of trust, and homebuyer agreement stipulate the terms for early loan repayment or repayment due to default. The Housing Authority chooses to recapture the funds if the repayment occurs during the affordability period.

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

Units assisted with HOME funds will meet the minimum periods of affordability set forth in 92.254(a)(4), which are based on the total amount of HOME funds invested in the housing.

Program guidelines shall require that owners:

1. Have a household income as adjusted for the buyer's household size that does not exceed 80% of AMI as determined by HUD;
 2. Agree in writing to the loan terms established by the City, including resale and recapture provisions;
 3. Occupy the property as their primary residence; and
 4. Agree to other requirements under 92.254(a)(4).
4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not use its HOME funds to refinance existing debt. Should the City use HOME funds for this purpose it will comply with 92.206(b) requirements regarding refinancing, including affordability, eligibility, a review of management practices, and feasibility.