



Human Services Department Representative: Michelle Bendyk | Tenant Representatives: Judith Morgan, Naomi Campbell  
1<sup>st</sup> District: Rena Wang | 2<sup>nd</sup> District: Jake Mackenzie | 3<sup>rd</sup> District: Chris Borr | 4<sup>th</sup> District: Teddie Pierce  
5<sup>th</sup> District: VACANT | Executive Director: Michelle Whitman

## **Sonoma County Community Development Committee Regular Meeting**

**PLEASE NOTE: This is a hybrid meeting and will be held in-person and online.**

**The meeting will be held in the Hearing Room of the Sonoma County Community Development Commission located at 141 Stony Circle, Suite 210, Santa Rosa, CA, 95401.**

**The Zoom webinar may be accessed at the following link:**

**<https://sonomacounty.zoom.us/j/97641042730?pwd=c3L07sssFew0BxHuY28lJCbFVimbs.1>**

**Telephone Option: (669) 444-9171**

**Webinar ID: 976 4104 2730**

**Passcode: 823071**

Wednesday, August 20, 2025  
10:00 am – 12:00 pm

### **AGENDA**

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

**2. Public Comment on Items Not on the Agenda**

**3. Approve Meeting Minutes from July 16, 2025**

The Committee will review, discuss, and may take action to approve the meeting minutes or may recommend changes.

*Recommended Action: Approve minutes*

**4. Deputy Director's Report**

Rhonda Coffman, Deputy Director

Deputy Director Coffman will provide an update on agency business.

*Information Only – No action item*

**5. PUBLIC HEARING: Sonoma County Housing Authority - Public Housing Authority (PHA) Administrative Plan Updates for Fiscal Year 2025-26**

Martha Cheever, Deputy Director

Housing Authority staff will provide a status update on the annual plan for the Sonoma County Housing Authority.

- Staff Presentation
- Committee Questions
- Open Public Hearing
- Hear Public Comments
- Close Public Hearing
- Committee Discussion
- Motion
- Roll Call Vote

*Recommended Action: Approve FY 2025-26 PHA Annual Plan*

**6. Adjournment**

**Next Regular Meeting:  
September 17, 2025, 10:00 am – 12:00 pm**

**PUBLIC COMMENTS PRIOR TO THE COMMITTEE MEETING:** Public comments may be submitted via email to [CDC-8130-Public-Comment@sonomacounty.gov](mailto:CDC-8130-Public-Comment@sonomacounty.gov). Virtual attendees are encouraged to submit their comments via email before the meeting.

**PUBLIC COMMENTS DURING THE COMMITTEE MEETING:** Any member of the audience that would like to address the committee - please raise your hand during the public comment period, which will be noted after staff have presented each item. When called by the Chair, please walk to the table that is labeled with the **Public Speaker** nameplate, then you may state your name and make your comments. Comments should be limited to the subject matter under discussion. Virtual attendees may raise their hand using Zoom, or dial \*9 to raise their hand by telephone and will be directed to speak by the Chair. Each person is granted 3 minutes to speak; time limitations are at the discretion of the Chair.

**MEETING DOCUMENTS:** The associated documentation is available on the website at <https://sonomacounty.ca.gov/development-services/community-development-commission/boards-commissions-and-committees/community-development-committee>. Any changes to the date of the meeting, or any other updates, will be noticed on the above website.

**DISABLED ACCOMMODATION:** If you have a disability that requires an accommodation, an alternative format, or requires another person to assist you while attending this meeting, please contact the Section 504 Coordinator at (707) 565-7520 as soon as possible to ensure arrangements for accommodation.

Language Services are available upon request if made at least 48 hours in advance of the meeting to help ensure availability. For more information or to request services, please contact the Section 504 Coordinator at (707) 565-7520.

**QUESTIONS ABOUT THIS MEETING**

For questions related to this meeting please contact Commission staff by calling 707-565-1268.

**COMENTARIOS PÚBLICOS ANTES DE LA REUNIÓN DEL COMITÉ:** Pueden enviarse por correo electrónico a Veronica.Ortiz-DeAnda@sonomacounty.gov.

**COMENTARIOS DEL PÚBLICO DURANTE LA REUNIÓN DEL COMITÉ:** Cualquier miembro de la audiencia que desee dirigirse al Comité sobre un asunto de la agenda, por favor alze la mano cuando el presidente del comité anuncie el asunto y pregunte si hay alguien que quiera hacer un comentario. Cuando el presidente lo llame, diríjase a la mesa de comentarios públicos, diga su nombre y haga sus comentarios. Para que todos los interesados tengan la oportunidad de hablar, limite sus comentarios al tema en discusión. Generalmente a cada persona se le conceden 3 minutos para hablar; Las limitaciones de tiempo quedan a discreción del presidente.

**DOCUMENTOS DE LA REUNIÓN:** La documentación asociada está disponible en el sitio web en <https://sonomacounty.ca.gov/development-services/community-development-commission/boards-commissions-and-committees/community-development-committee>. Cualquier cambio en la fecha de la reunión, o cualquier otra actualización, se notificará en el sitio web mencionado arriba.

**SERVICIOS PARA LOS DISCAPACITADOS:** Si tiene una discapacidad que requiere un alojamiento, un formato alternativo o requiere que otra persona lo ayude mientras asiste a esta reunión, comuníquese con el Coordinador de la Sección 504 al (707) 565-7520 lo antes posible para garantizar los arreglos para alojamiento.

Los servicios lingüísticos están disponibles si recibimos su petición al menos 48 horas antes de la reunión para ayudar a garantizar la disponibilidad. Para obtener más información o solicitar servicios, comuníquese con el Coordinador de la Sección 504 al (707) 565-7520.

#### **PREGUNTAS SOBRE ESTA REUNION**

Si tiene preguntas sobre esta reunión, por favor comuníquese con el personal de la Comisión llamando al 707-565-7520.



Human Services Department Representative: Michelle Bendyk | Tenant Representatives: Judith Morgan, Naomi Campbell  
1<sup>st</sup> District: Rena Wang | 2<sup>nd</sup> District: Jake Mackenzie (Chair) | 3<sup>rd</sup> District: Chris Borr (Vice Chair)  
4<sup>th</sup> District: Teddie Pierce | 5<sup>th</sup> District: VACANT | Executive Director: Michelle Whitman

**Sonoma County Community Development Committee  
Regular Meeting**

**DRAFT Meeting Minutes**

Wednesday, July 16, 2025  
141 Stony Circle, Suite 210, Santa Rosa, CA 95401  
10:00 a.m. - 12:00 p.m.  
Hybrid Meeting

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

The meeting was called to order at 10:00 a.m. by Chair Mackenzie. Community Development Commission (CDC) staff conducted the roll call:

Community Development Committee Members

Rena Wang – District 1	Present
Jake Mackenzie, Chair – District 2	Present
Chris Borr, Vice Chair – District 3	Present
Teddie Pierce – District 4	Present
VACANT – District 5	VACANT
Judy Morgan – Tenant Representative	Present
Naomi Campbell – Tenant Representative	Present
Michelle Bendyk – Human Services Representative	Present

CDC and Sonoma County Housing Authority Staff Present

Michelle Whitman, Executive Director  
Rhonda Coffman, Deputy Director  
Martha Cheever, Deputy Director  
Veronica Ortiz-De Anda, Community Development Assistant Manager  
Matthew Burns, Administrative Aide

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

None.

**3. Approval of June 25, 2025 Meeting Minutes**

Public comments: None.

Action: The committee moved to approve the meeting minutes.

Motion: Borr

Second: Bendyk

Ayes: Wang, Mackenzie, Borr, Pierce, Morgan, Campbell, Bendyk

Noes: None

Abstain: None

Absent: None

***Motion Passed.***

**4. Executive Director's Report**

Michelle Whitman provided a report to the committee regarding recent agency business, which includes updates on the approval of the Consolidated Plan and the Annual Action Plan for fiscal year 2025-26, updates on housing projects supported by the Commission, as well as information about the Notice of Funding Availability for remaining CDBG-CV funds. Director Whitman concluded her report by touching on recent agencywide events, such as the CDC Company Picnic, which was held in observance of the Fourth of July.

**Public comments:** None.

**5. Sonoma County Housing Authority: Award of Project-Based Vouchers for Permanent Supportive Housing Projects**

Deputy Director Martha Cheever presented multiple requested actions to the committee related to the award of project-based vouchers (PBVs) for permanent supportive housing (PSH) projects. Ms. Cheever outlined the process undertaken by Housing Authority staff to distribute a Request for Proposals (RFP) to solicit proposals for construction projects, or substantial rehabilitation projects, that will provide new permanent supportive housing units in Sonoma County. She provided information about the project being recommended for the award, which is in Rohnert Park and is the result of a successful Homekey application submitted by Burbank Housing Development Corporation (BHDC) in partnership with the City of Rohnert Park. She then discussed staff's second recommendation, which is to award an additional four PBVs to BHDC for the Petaluma River Place project; Ms. Cheever then discussed the final recommendation, which is the approval of an extension to the PBV agreement with Downtown River Apartments for an additional six years.

**Public comments:** The organizations that were slated to receive new project-based vouchers – BHDC, City of Rohnert Park, and Eden Housing – were required to attend this meeting; staff from all of these organizations provided responses to numerous questions from committee members.

Actions:

1. Approve staff's recommendation to award 70 Project-Based Vouchers to BHDC for the permanent supportive housing project in Rohnert Park.
2. Approve staff's recommendation to award an additional 4 project-based vouchers on a non-competitive basis to BHDC for the Petaluma River Place project in Petaluma.
3. Approve staff's recommendation to extend the project-based voucher agreement for Downtown River Apartments for an additional six (6) years for a term expiring August 1, 2045.
4. Direct staff to present the recommendations to the Board of Commissioners at an upcoming Board meeting.

Motion: Mackenzie

Second: Wang

Ayes: Wang, Mackenzie, Borr, Pierce, Morgan, Campbell, Bendyk

Noes: None

Abstain: None

Absent: None

***Motion Passed.***

**6. Adjournment**

The meeting adjourned at 10:39 a.m.



**Sonoma County Community Development Commission  
Sonoma County Housing Authority**

141 Stony Circle, Suite 210, Santa Rosa, CA 95401-4142  
P.O. Box 12025, Santa Rosa CA 95406-2025

*Members of the  
Commission*

**Lynda Hopkins**  
Chair

**Rebecca Hermosillo**  
Vice Chair

**David Rabbitt**  
**Chris Coursey**  
**James Gore**

**Michelle Whitman**  
Executive Director

## MEMORANDUM

Date: August 20, 2025

To: Community Development Committee

From: Martha Cheever, Deputy Director, Housing Authority Division

Subject: Updates to the Public Housing Authority Administrative Plan

The Sonoma County Housing Authority (SCHA) administers the Housing Choice Voucher Program (Program) under contract with the US Department of Housing and Urban Development (HUD). This Program enables very low-income households to rent from private landlords at fair market rental rates and provides rental assistance in the form of project-based vouchers, tying assistance to specific units. Vouchers provide the best avenue to housing stability for low-income households.

A required element of program administration is a Public Housing Authority Administrative Plan (Administrative Plan). The Administrative Plan serves as a local guide for implementation of HUD's requirements. On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was passed which makes sweeping changes to the administration of federally funded rental assistance programs. Enactment of several major changes have been delayed by HUD until their reporting software is available for use by housing authorities.

Approval of the proposed changes incorporates all required HOTMA changes and adds verbiage to allow implementation of certain provisions only upon implementation by HUD.

The most significant HOTMA requirements within the Administrative Plan place an asset limitation on applicants and tenants (chapters 3 and 7). While these are being clarified in our policies, they will not be implemented until such time as required by HUD.

The most significant local policy changes that are being made are the creation of a designated Mainstream Voucher program waitlist and the addition of a local preference on both the Mainstream Voucher and the Housing Choice Voucher waitlists for active Emergency Housing Voucher (EHV) tenants (Chapter 4). These changes will allow for the Housing Authority to transfer active EHV tenants to a program that has ongoing funding thereby preventing households from reentering homelessness.





A description of key changes being proposed to the Administrative Plan are included as attachment 1 to this item. All red-lined changes may be accessed here: <https://share.sonoma-county.org/link/ODyut98iWkA/>

In accordance with federal requirements, notification of the proposed Administrative Plan changes and public hearing was distributed broadly. Written comments were accepted through August 4, 2025. All written public comments received in response to the changes are included in Attachment 2 to this item.

**Recommended Action:** Approve proposed changes and recommend approval of changes by the Sonoma County Community Development Commission Board of Commissioners

**Attachment 1 – Summary of Key Changes**

**Attachment 2 – Public Comments Received**

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

Below is a summary of changes being proposed to the Sonoma County Housing Authority Administrative Plan. This summary is intended to provide a broad overview of what has been determined to be substantive changes. Interested parties are encouraged to review the red-lined changes to the Administrative Plan. All red-lined chapters are available for review on-line at: <https://share.sonoma-county.org/link/ODyut98iWkA/> or in person at the office of the Sonoma County Housing Authority located at 141 Stony Circle, Suite 210.

### **Chapter 00. Introduction**

**Introduction, pages 1-5.** Provides background information related to the Housing Opportunity Through Modernization Act (HOTMA) and the implementation of the National Standards for the Physical Inspection of Real Estate (NSPIRE) .

### **Chapter 1. Overview of the Program and Plan**

There are no substantive changes to Chapter 1.

### **Chapter 2. Fair Housing and Non-Discrimination**

**2-I.C, pages 4-5.** Provides information for tenant's wishing to file a fair housing complaint.

### **Chapter 3. Eligibility**

**3-I.B, page 4.** At HOTMA implementation date, amends the definition of "Family" to include otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days

**3-I.K, pages 9-10.** Adds back in the pre-HOTMA definition of a foster child and foster adult

**3-I.M, page 12.** Provides flexibility for adding a Live-In-Aid when a disability related need is apparent or known to the Housing Authority.

**3-II.C, pages 19-20.** Removes allowable delay and previous exemption for providing complete and accurate social security number.

**3-III.C, page 29-30.** Delays the restriction on asset limitations until the HOTMA compliance date and adds in that Housing Authority's do not have discretion to NOT enforce the asset limitation at admission.

**3-III.C, page 31.** Adds in a policy for geographical hardship for when a household owns a home which is habitable. Adds an explanation that real property may not be excluded from asset limitations under any circumstances.

### **Chapter 4. Application Waitlist and Tenant Selection**

**4-II.B, page 5.** Clarifies that the Housing Authority will maintain separate waitlists for the Housing Choice Voucher program, the Mainstream Voucher program, and Project Based voucher programs.

**4-III.C, page 13-18.** 1) Adds a Housing Choice Voucher preference for existing Emergency Housing Voucher households, 2) Adds point values to certain local preferences, 3) Clarifies that some homeless preferences are available even when the waitlists are closed to other applicants; 3) Removes preference for persons transitioning out of a mental health

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

institution or other segregated setting, 4) Adds a Mainstream Voucher waitlist preference for existing Emergency Housing Voucher program households, 5) Adds referral preference for the Mainstream Voucher Program Waitlist.

### **Chapter 5, Briefing and Voucher Issuance**

**5-I.B, page 2.** Provides clarity on the Housing Authority's policy for notifying a family of their eligibility for assistance and requirement to attend a briefing.

**5-I.B, page 3-6.** Provides an option for a pre-recorded briefing video to be reviewed in lieu of an in-person or telephonic briefing.

**5-I.B, page 5-8.** Updates requirements for oral briefings to remove irrelevant requirements and updates the requirements for documents to be included in briefing packets.

**5-II.D, page 15.** Clarifies that the PHA will issue a voucher to an eligible applicant family within 60 days of determining eligibility. Also updates the allowable dates for income verification.

### **Chapter 6A , Income, New Chapter**

This chapter is entirely new and therefore contains no red line changes. The chapter reinstitutes pre-HOTMA rules related to income calculation for rental assistance programs

### **Chapter 6B, Income and Subsidy Determinations Under HOTMA 102/104**

**Part I, page 6B-2.** Clarifies that income will be calculated using gross wages, before wage garnishments.

**6-I.D, page 6B-11.** Clarifies that income earned as a seasonal worker or day-laborer is NOT considered non-recurring income and will be used in income calculations.

**6-I.F, page 6B-14.** Clarifies that income earned from 'gig-work' such as rideshare drivers, babysitters, etc is NOT considered non-recurring income and will be used in income calculations.

**6-I.G, pages 6B 16-17.** Removes pre-HOTMA income rules related to student financial assistance.

**6-I.G, pages 6B 18-20.** Clarifies that student financial aid that exceeds actual covered costs for education is to be included in the income calculation and provides the process for when and how the student financial assistance is counted based upon circumstances.

**6-I.H, pages 6B-22-23.** Provides clarification on what the Housing Authority may consider a periodic payment for purposes of income calculation.

**6-I.I, page 26.** Removes the flexibility to extend excluded income beyond 1 year. Clarifies that in-kind donations received by friends and family are included as income.

**6-I.M, pages 29-35.** Updates the HUD allowable list of income exclusions.

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

**6-II.C, pages 43-44.** Provides clarification as to when and how the Housing Authority will count income received from a Trust.

**6-II.C, page 45.** Clarifies how the Housing Authority should count or exclude tax refunds.

**6-III.D, pages 51- 52.** Clarifies that the Housing Authority will use the current IRS Publication 502 as a standard for determining eligible medical expenses.

**6-III.F, page 56.** Removes Earned Income Disallowance (EID) provisions from childcare expense deductions. The EID program has been ended by statute.

**6-IV.C, pages 6B-67-69.** Addresses regulatory changes related to changes in payment standards related to when and how changes (increases or decreases) will be applied. The Housing Authority policy to not decrease payment standards for those households in existing leases remains the same. The Housing Authority will only apply increases in payment standards at the family's first regular or interim reexamination. If a family unit size changes during the term of a HAP contract, the new payment standard will be applied when a new HAP contract is executed.

**6-IV.D, page 6B-70.** Clarifies that the Housing Authority will utilize its existing utility allowances even when an owner charges a flat fee for utilities and also clarifies that if a PBV project has a site-specific utility allowance that the Housing Authority will utilize that utility allowance schedule.

**EXHIBIT 6-1, pages 6B-73-77.** Adds the regulatory definition of income

**EXHIBIT 6-2, page 6B-78.** Adds regulatory language related to Net Family Assets.

**EXHIBIT 6-3, pages 6B-79-80.** Adds regulatory language related to Welfare Benefit Reduction

### **Chapter 7A, Verification, New Chapter**

This chapter is entirely new and therefore contains no red line changes. The Chapter reinstitutes pre-HOTMA rules related verification requirements

### **Chapter 7B, Verification Under HOTMA 102/104**

**7.I.A, page 2.** Requires that a household member who turns 18 years of age between annual recertifications must sign Housing Authority forms within 10 business days of turning 18.

**7.I.C, pages 5-6.** Adjusts the process for annual recertification related to fixed income sources to eliminate unnecessary processes.

**7.I.F., page 11-12.** Provides flexibility in calculating income when income is seasonal or fluctuating in nature so that income reflected is accurate. Also provides for when the Housing Authority may or will request written third-party verification of income.

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

**7-III.C, page 25.** Changes requirement for applicants to provide verification of Social Security and SSI benefits from something current within the past 120 days to appropriate benefit year.

**7-III.D, page 26.** Clarifies that the Housing Authority will verify alimony and child support payments received and outlines the verification hierarchy.

**7-III.F, pages 27-29.** Provides the process for self-certification and verification of ownership of real property and removes former policy regarding the disposal of assets for less than fair market value.

**7-III.J, page 30.** Clarifies that the Housing Authority is NOT required to verify fully excluded income.

**7-IV.D, page 39.** Provides that an assisted family member cannot be the recipient of deductible child care expenses. Provides that the Housing Authority will confirm that only “Reasonable” childcare expenses are allowable as income deductions.

### **Chapter 8A, Housing Quality Standards and Rent Reasonableness Determinations**

**8-I.A., pages 3-4.** Outlines that NSPIRE standards for carbon monoxide alarms, smoke alarms and lead based paint hazards apply even if NSPIRE standards haven’t been fully implemented.

**8-I.C, page 8.** Adds that confirmation of emergency repairs will be made by the Housing Authority on the next business day following owner notification.

**8-I.D, pages 8-10.** Outlines the owners responsibility for maintaining housing quality standards in assisted units. Adds the policy that the Housing Authority will waive the owner’s responsibility when deficiencies are determined to have been caused by an assisted family. Also lays out specific times when an assisted family may be held responsible for a breach of housing quality standards.

**8-II.B, pages 14-15.** States that the Housing Authority will require all deficiencies in a unit to be corrected before a HAP agreement will commence. States that the Housing Authority will not rely on alternative inspections.

**8-II.C, page 17.** Adds that the Housing Authority may opt to conduct an annual inspection of certain units rather than biennially.

**8-II.D, page 18.** Adds regulatory information related to life-threatening deficiencies.

**8-II.F, pages 20-21.** Outlines the process and policy for Notification of Corrective Actions related to failed inspections.

**8-II.G, pages 23-25.** Adds new regulatory guidance related to housing assistance payments and abatement of rent. Clarifies that the Housing Authority will not immediately abate rent to owners upon notification of deficiencies but allow the owner an opportunity to take corrective action. States that any abatements will be effective the first of the month and that the Housing Authority will inspect abated units within five business days of notification

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

that repairs have been made. Sets in policy that the longest time that the Housing Authority will abate rent before cancelling a HAP contract is 60 days.

**8-II.H, pages 25-26**. States that if a family fails to correct family-caused housing quality standard deficiencies in the allowable period, the family will be terminated from the program. Also states that if the owner pays to repair family-caused deficiencies, that the owner may bill the family for the repair and enter into a repayment agreement with the family.

### **Chapter 8B, National Standards for the Physical Inspection of Real Estate and Rent Reasonableness Determinations. New Chapter**

This chapter is entirely new and therefore contains no red-line changes. The Chapter lays out the inspection process under the National Standards for the Physical Inspection of Real Estate (NSPIRE).

### **Chapter 9, General Leasing Policies**

**9-I.G, page 13**. Adds regulatory language stating that any HAP contract that is not executed within 60 days from the beginning of a lease term is void.

### **Chapter 10, Moving with Continued Assistance and Portability**

**10-I.B, pages 4-5**. States the process for a tenant to move when they are in a deficient unit due to the owner's failure to make necessary repairs. Provides that when a disabled family's HAP contract is terminated because the owner fails to make repairs, up to two months of abated rent may be used to assist with the security deposit in a new unit. No other relocation assistance funds will be provided.

**10-II.A, page 11-13**. Provides that if a participant family is subject to a repayment agreement, they will not be allowed to exercise portability until such time that the debt to the Housing Authority is paid in full.

### **Chapter 11A, Reexaminations, New Chapter**

This chapter is entirely new and therefore contains no red-line changes. The Chapter reinstitutes pre-HOTMA rules related verification requirements

### **Chapter 11B, Reexaminations Under HOTMA 102/104**

**11-II.B, pages 9-10**. States that if a family's voucher size changes during the term of a HAP contract, the new voucher size will be used to determine the payment standard at the first reexamination following the change in family size..

**11-II.C, pages 11**. When a family reports an increase in income during the last three months of a certification period, the Housing Authority will not process the increase until the next regular reexamination, regardless the size of the increase.

### **Chapter 12, Terminations**

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

**12-I.B, pages 2-3.**When a family is receiving zero rental assistance and they are set for termination from the program, it is the assisted family's responsibility to notify the Housing Authority of changes in circumstances occur.

**12-I.D, pages 3-4.**Clarifies that for purposes of termination from the rental assistance program, a family is considered evicted from a unit if they move after a legal eviction order has been issued. Section also adds that upon HOTMA implementation, the Housing Authority will terminate assistance when an assisted household revokes consent for the Housing Authority to collect information from financial institutions.

**12-I.E, pages 6-7.** Clarifies the policy for termination of assistance related to abuse of illegal drugs or alcohol that interfere with the health, safety, or right to peaceful enjoyment of the premises of other residents. Defines "Currently Engaged" in as the use of illegal drugs during the previous three months.

**12-I.E, page 10.**Outlines post-HOTMA asset limitations for existing participants. An exception policy will be utilized for households of elderly persons (ages 62+) and disabled households. The asset limitation for these households will be \$250,000. All other existing households will be subject to the HUD-published asset limitation amount (\$103,200 for 2025). The exception policy does not apply to participant owned homes which are otherwise suitable for dwelling.

**12-I.E, pages 10-11.** Updates the policy for termination of assistance when the Housing Authority has insufficient funding and must terminate households from any of its rental assistance programs. The designated order of termination is ranked from highest income and asset households and then, if ever necessary converts to those households who have been on the program the longest.

**12-III.D, pages 23-24.** Outlines some of the reasons an owner may consider when deciding whether or not to terminate the tenancy of an assisted tenant.

### **Chapter 13, Owners**

**13-1.C, page 6.**States that a unit is not in compliance with housing quality standards if the owner fails to make required deficiencies within the appropriate timeframe.

**13-1.D, page 7.**Provides a mechanism for the Housing Authority to pay risk mitigation funds to an owner when an assisted unit is damaged by a tenant and the damage exceeds normal wear and tear. This program is not available for corporately owned, multi-family units.

### **Chapter 14, Program Integrity**

There are no significant changes being proposed in this chapter

### **Chapter 15, Special Housing Types**

**15-VI.C, page 14-17.** Modifies policy to match existing practice. Updates the description of what is considered rent for a manufactured home to include all eligible housing expenses for manufactured homes. Clarifies that if the housing assistance payment exceeds the

## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

portion of the monthly rent due to the owner for space rent, the housing authority will pay the excess to the assisted family.

**15-VII.B, page 18 -19.** Clarifies that the homeownership program is available to assisted tenants in the Mainstream Voucher program. Provides that the minimum income requirement for a disabled family's participation in the homeownership program is equal to the current SSI monthly payment for an individual living alone.

**15-VIII.G, page 24.** Clarifies the Housing Authority policy for homeownership professional home inspections. Removes the requirement for the Housing Authority to select tin inspector and removes the Housing Authority as the intermediary for receipt of the home inspection report. Allows that the Housing Authority may deny a homeownership unit due to information found in the inspector report even if the unit otherwise complies with housing quality standards.

**15-VII.K, page 28** Provides that for homeownership the payment standard may not be lower than what the payment standard was at the commencement of homeownership assistance.

### **Chapter 16, Program Administration**

**16-II.A, page 3-11.** Describes Small Area Fair Market (SAFMR) rents and the processes for a housing authority to implement them. Sets the Housing Authority policy that the Housing Authority is not a mandatory SAFMR area and will not voluntarily adopt SAFMRs. Sets Housing Authority policy that there will not be designated payment standard areas within the jurisdiction. Describes the process for when a housing authority may pay rents above the basic payment standard range or set Exception Payment Standards. Sets Housing Authority policy that exception payment standard areas have not been adopted. Sets Housing Authority policy that payment standards will be reviewed on an annual basis and ensure that payment standards are with in the HUD basic range (90-110

**16-II.C, page 11.** Institutes a policy that the Housing Authority will maintain and energy efficient utility allowance schedule beginning at the next utility allowance update. Updates the utility allowance policy to include the requirement for a utility allowance for air conditioning in an assisted unit.

**16-III.C, page 20.** Provides a policy for a Family Self Sufficiency (FSS) participant to request an informal hearing when supportive services are withheld or a family is terminated from the FSS program.

**16.IV.A, page 35-39.** Provides a policy that housing authority staff will consult with the HUD Field Office and the OIG Special Agent to determine if participant fraud will be referred to the state or district attorney for fraud charges.

### **Chapter 17, Project Based Voucher (PBV) Program**

**17-I.A, pages 2-3.** Updates regulatory information and clarifies the policy for project types PBVs may be applied to.



## **Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan Public Hearing on August 20, 2025**

**17-I.B, pages 6-7.** Provides that the Housing Authority may opt to provide fewer project based vouchers to than what was requested in a proposal. Updates the process for tied PBV applications to remove date/time submission as a tiebreaker.

**17-VI.B, page 36.** Provides that the Housing Authority may pull names from other waitlists when accessible units are available and there are no qualifying families on the site-specific PBV waitlist.

**17-VI.C, page 38-40.** Updates list of PBV projects utilizing the Sonoma County Coordinated Entry System for the PBV units. Updates that the housing provider must provide the Housing Authority with the basis for which any applicant was denied admission to the PBV program.

**17-VIII.B, page 53.** Clarifies that rent increases for PBV units must be submitted to the Housing Authority at least 60 days prior to the anniversary month of the PBV HAP contract.

### **Chapter 18, Intentionally Blank**

### **Chapter 19, Special Purpose Vouchers**

**19-I.B, page 2.** Clarifies where and how referrals for the Family Unification Program (FUP) family and youth program vouchers originate.

**19-I.K, page 17.** Clarifies that the Housing Authority may project base FUP vouchers in accordance with policies outlined in Chapter 17.

**19-II.B, page 19.** Clarifies the role of the Coordinated Entry System in identifying FUP eligible youth in the community.

**19-II.D, page 20.** Adds regulatory language which allows administrative fee reserves to be used to cover the costs of supportive services.

**19-III.C, pages 34-36.** Requires that the Housing Authority must use available flexibilities related to verification of social security numbers for VASH recipients. Adds alternative requirements for income verification for VASH households. Clarifies in policy that the Housing Authority will not charge a minimum rent to VASH households.

**19-III.E, page 38.** Clarifies that for VASH households the Housing Authority may provide an exception payment standard up to 140% of the published Fair Market Rent as a reasonable accommodation for a household that includes a person with a disability. Provides clarification on the types of housing a VASH household may utilize a voucher in.

**19-III.G, pages 41-42.** Adds alternative requirements for the termination of assistance for a VASH household. Provides that if a VASH family is not participating in case-management and would otherwise be terminated from assistance, the Housing Authority may opt to offer the family continued assistance through the Housing Choice Voucher program. Provides that the Housing Authority is not required to terminate a VASH household if they are evicted from assisted housing, but have authorization to consider the circumstances in each situation.

**Overview of Proposed Changes to the Sonoma County Housing Authority Administrative Plan  
Public Hearing on August 20, 2025**

**19-III.H. pages 42-46.** States that VASH PBV assistance must be terminated for a VASH household fails to participate in case management when it is required by the VA. Provides that a VASH participant who is non-compliant with case-management will have 120 days to move from the PBV unit. Provides regulatory information related to how a PBV HAP contract will be handled when a VASH participant is terminated. Addresses moves from VASH PBV units with continued assistance. Addresses determinations that a VASH family is occupying a wrong size unit or a unit that has accessibility features not necessary for the family. Adds in regulatory information related to VASH participants when a PBV HAP contract ends, the setting of rents in VASH PBV units, removing units from a PBV HAP contract when a participant is ineligible for assistance and zero HAP families. .Provides that project selection for VASH PBVs may be made on a non-competitive basis when units are made exclusively available to VASH recipients on the site of a VA facility.

**19-IV.D. pages 49-50.** Updates regulatory guidance related to the Mainstream Voucher program. Updates the Housing Authority policy to provide that the Housing Authority will maintain a separate waiting list for the Mainstream Voucher program.

**19-IV.E. pages 50-51.** Establishes local preferences for administration of the Mainstream Voucher waitlist. Provides preference points for existing Emergency Housing Voucher households and applicants who are referred for assistance by a local service provider who has entered into an MOU with the Housing Authority.

**19-IV.F. pages 51-52.** Sets Housing Authority policy that initial search term for all Mainstream Vouchers will be 120 days from voucher issuance. Sets Housing Authority policy for the voucher extension including the requirement that Mainstream Voucher families receive contact from the Housing Authority notifying them of voucher termination at least 30 days prior to voucher expiration.

**From:** [REDACTED]  
**To:** [CDC-Public-Comment](#)  
**Subject:** PUBLIC COMMENT SUBMISSION HEARING 07/16  
**Date:** Wednesday, June 18, 2025 10:21:37 PM

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## EXTERNAL

To the Sonoma County Housing Authority and Community Development Committee

### Argument 1

Subject : Objection to Change in Waitlist Preference Policy (Section 4-III.C)

I am writing to formally object to the policy clarification in Section 4-III.c of the proposed PHA Administrative Plan, which states that homeless preferences will remain available even when waitlists are closed to other qualified applicants.

This change, while possibly well-intended, it's unfair to low-income residents who have been patiently waiting for assistance through the proper channels—people who work, have children, pay taxes, and follow the rules. Many of these applicants are also at risk of homelessness themselves, but are somehow still holding on through a combination of self-preservation and part-time work, gig work, or living in overcrowded conditions.

Prioritizing individuals simply for being homeless, without evaluating the cause or context of their situation (e.g., drug addiction, criminal behavior, or chronic non-compliance with treatment, or job requirements), sends the *WRONG* message. It penalizes those who are stable but struggling and rewards those who, in the majority of cases, are not making any effort to improve their own circumstances. It also promotes queue jumping at the expense of fairness and accountability. We have to stop coddling the homeless for the sake of aesthetics and require them to be self-sufficient in some capacity, like the rest of us, if they want help. In the end, you can not in good conscious fast-track individuals simply for being homeless (even if they have a high-risk factor score) but stand to *REMOVE* the preferences of the mentally ill who have recently been released from a mental institution? So, remove the people who don't choose for their mental stability to be a serious hurdle when it comes to obtaining stable housing, and switch them out to help the able-bodied adult homeless person instead. It makes total sense--NOT. Please reconsider these decisions since these changes help no one in this community who uses your services; they just satisfy the aesthetic of the town.

### Objection 2

Subject: Objection to Income Calculation Policies

I want to express my strong objection to several deeply concerning income-related policies proposed in the Administrative Plan, particularly those outlined in Chapter 6B regarding gross income calculations and the treatment of in-kind support as income. These policies are detached from the financial reality that working residents of Sonoma County face every single day.

The proposal to maintain the base eligibility and rent calculations on gross wages—before garnishments or taxes—is completely unreasonable. We never see that money. It's the government's cut of our work. Wage garnishments for things like child support or IRS debt are legally required and are automatically deducted. It's extremely misleading and harmful to assess us as if we receive income we actually never see or touch.

Instead of a simple and fair approach—like averaging our last 90 days of *actual* paychecks with the *real* amount we receive—you're applying math that inflates our income by the thousands and sometimes tens of thousands of dollars per year! That not only disqualifies people who genuinely need help, but it also places

others in higher rent tiers they can't actually afford. You are setting people up to fail—not succeed.

Additionally, I was shocked to see that in-kind support—such as groceries, babysitting or help with a utility bill once in a while from a friend or family member—is now being counted as income. This is absurd. Unless you have reason to suspect, on a case-by-case basis, that this individual is getting “gifts” for over half the stuff she needs to maintain stability, why would you do that? Why? These aren't steady earnings. They are acts of kindness—temporary lifelines from loved ones trying to help us survive when they can. If I don't eat because I have to pay my PG&E bill, and my aunt helps cover it, that's not income. That's humanity. It shouldn't be something we are now penalized for.

To make matters worse, the way income levels are configured and then used in regard to your rent rates for affordable housing in Sonoma County isn't even based on our own income. It's based on the Area Median Income (AMI)—not based on the actual income that the particular participant ACTUALLY earns. IF this is not true—please publicly clarify—but knowing it is, how is this fair to the people in need? In conjunction with all these other income and eligibility restrictions, how does this help really?

Lastly, I want you to imagine being in this situation. Not trying to “live off the government”, but needing some help in this crazy economy, especially in California. Your eligibility is being based off an inflated income that you don't actually take home, the diapers and other house hold toiletries your mom and aunt drop off every now and then is being counted as your personal income, then they take all that “income” you have and see if it matches up with the AMI in the neighborhood your trying to move to( 9 times out of ten it does NOT)—if it's not then you're paying the scaled rent amount for that income amount—not your own. But of course, all of this is only after the jobless but capable homeless adults, who are prioritized before you get their homes. You understand, right? God Bless America.

If the government really wanted us to stop needing them for basic human needs, then maybe one day, one of these governments, perhaps local, will take the strides for our take-home wages to reflect the actual cost of living in Sonoma County. But until then, the reality is we just can't keep up with the rates of rent. The system is broken. Let's ensure that this program changes in ways that actually benefit the recipients.

I urge the committee to reconsider.

We are the working class. We pay taxes. We follow the rules. All we ask is that the system be based on truth and logic, not spreadsheets and assumptions. Thank you for the opportunity to comment on the issues today.

Respectfully

Nadina Tassara

Santa Rosa, CA

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**To:** [CDC-Public-Comment](#)  
**Subject:** ADA Violations at Sonoma County Section 8 Waitlist  
**Date:** Saturday, June 21, 2025 2:10:16 PM

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## EXTERNAL

To Whom What appears to be missing is that under Federal law which also supersedes all state laws, per Social Security Administration Full Extra Help Program:

“There are no asset limits for SSDI and additionally, are fully 100% eligible for any and all state and federal programs that provide extra financial help or other programs of extra financial support for those with SSI and with SSDI, all those programs cannot restrict or reduce or deny any benefits or services, medical, housing, or otherwise that would go to an SSI person, and cannot count assets as there are no asset limits for SSDI, or restrict on that basis, for dual, continuously enrolled in Medicaid and Medicare. Additionally, COLA increases in SSDI cannot any income legally, post original award date monthly amount. To deny an SSDI person for any program or service or reduce benefits is against Federal law, is illegal and discriminatory and a violation of Civil Rights law and ADA.”

Therefore, your asset limit sections are null and void for those with SSDI determination (who are dually enrolled and or qualified for Medicare and Medicaid as QMB or otherwise).

Also Note ADA Violations by Sonoma County/Santa Rosa/Sebastopol Section 8:

I am SSDI and was thrown off of the Sonoma County Section 8 Housing Waitlist by Santa Rosa in approximately 2018 or 2019 post fires, when as a permanently disabled person under Section 811 the per disabled are to receive first priority of Section 8 housing placement, and with no 811 separate list available or otherwise, I should have been provided Reasonable Accommodation to get back on the list when I did not understand the notice. As a result, I was removed and displaced and experienced homelessness and housing instability continuing and could not afford to stay in the area, and experienced discrimination in housing in my former landlord who refused to have a “disabled person living there, did not accept disabled tenants to live there” in spite of prior tenancy to my permanent diagnosis, with much harassment and this and other sublets after, and onwards. It has caused me extreme financial hardship and mental and physical distress on top of already being a fire victim a VAWA and Homeless applicant. Under ADA law I should never have been removed from the Sonoma County Section 8 Wait List in Santa Rosa and Sebastopol, and I should also not have been removed from HUD project housing for being under a minimum income threshold, when the entire point of this housing is to house the low income disabled community such as myself, who have no other avenues. This must be remedied immediately with no open lists in California for years and no longer even able to get on the Sonoma County or Section 8 Wait Lists in spite of permanent disability and 10 years now of hardship from housing instability, and as a single female, I am more vulnerable as a population where prior to the fires, I could not even get on shelter wait lists for their discrimination of single women without children and who have service animals, in spite of a clean record and zero drug or criminal history. It is 2025 now and I am still not able to get on any Section 8 Wait Lists in all of Northern California, in spite of having formerly been on the Sonoma Section 8 Wait Lists. There should be no throwing the disabled

off of any wait lists, particularly with TBI who may need assistance with paperwork and other notices. I still require Reasonable Accommodation to get back on the list that was illegal to remove me from in the first place and is a violation of my Civil Rights and ADA Federal protections.

Signed,

Zoey C. Goetsch, MFA

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