

**Sonoma County**  
**DRAFT**  
**Fiscal Year 2024 One-Year Action Plan**



**Sonoma County Community Development Commission**  
**Sonoma County Housing Authority**  
P.O. Box 12025, Santa Rosa CA 95408-2025

*May 15, 2024*

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# Executive Summary

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

### 1. Introduction

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

The administration of CDBG, HOME and ESG funds are guided by funding policies set annually by the Commission with input from its advisory committees. The Commission uses a Community Development Committee (CD Committee), an appointed advisory committee comprised of representatives from each supervisorial district, Housing Choice Voucher tenants, and a representative from the Human Services Department and a Cities and Towns Advisory Committee (CTAC), an advisory committee comprised of representatives from all cities and towns in the Urban County to set these annual policies. Once funding recommendations are made for CDBG, HOME, and ESG by the CD Committee, CTAC, they are incorporated into the annual Action Plan for adoption by the Sonoma County Board of Supervisors.

For FY 2024-2025, the policies set aside funds for grant administration and planning, and the balance of funds are awarded through a competitive process in which organizations applied for funding to support eligible projects and programs to help meet the goals identified in the Consolidated Plan. The selection criteria used to select eligible activities and programs for funding to meet Consolidated Plan goals were included in the FY 2024-2025 CDBG, HOME and ESG Funding Policies that were published with the Notice of Funding Availability (NOFA) in November 2023.

The Commission's advisory committees made funding recommendations based on staff's review and analysis of the applicant projects and programs in two public meetings, including a public hearing held on March 20, 2024. These FY 2024-2025 Action Plan funding recommendations were then recommended to and approved by the Board of Supervisors on April 30, 2024.

2. Summarize the objectives and outcomes identified in the Plan

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

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

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

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

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

The objectives and outcomes of the activities identified in the FY 2024-25 Action Plan will help to create affordable housing, preserve existing affordable housing, prevent homelessness, provide supportive services and shelter to persons experiencing homelessness, remove architectural barriers to create accessibility, support small childcare provider business owners to provide and expand affordable childcare. The quantitative outcomes are described in more detail in the AP 20 and AP 35 sections of this Action Plan.

### 3. Evaluation of past performance

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

Sonoma County has a long-standing history of being a very expensive housing market, especially in comparison to median household incomes. A report released by Apartment List in September 2018 found that over half of Sonoma County residents were cost-burdened (paying more than 30% of income on rent), and nearly a third were severely cost-burdened (paying more than 50% of their income on rent). Additionally, catastrophic wildfires in October 2017 and October 2019 and flooding in February 2019 destroyed or rendered uninhabitable nearly 6,000 homes in Sonoma County. Furthermore, the global pandemic, COVID-19, which was declared an emergency in March 2020, spurred the mass shutdown of businesses and subsequent layoffs Countywide. Though the Governor's office and County implemented moratoriums on evictions for renters who were suddenly unable to pay rent due to loss of income, the County continues to seek ways to keep renters who are in volatile economic positions from entering homelessness now that the moratorium has expired. Thus, even though earlier Consolidated Plans for the Urban County prioritized rental housing affordability, rental housing affordability remains a top priority.

Due mainly to the disparity in housing rents versus household incomes, Sonoma County has a high rate of homelessness. In 2023, the Annual Point-in-Time Homeless Census and Survey found that approximately 2,266 residents were experiencing homelessness at any given time. This is a decrease of 22% from 2022, the rate of homelessness remains significantly higher than many similarly sized California counties and most of the nation. The funding of homeless intervention and prevention programs make up a large percentage of the "portfolio" of past performance and remains a top objective. Both ESG and ESG-CV funds are targeted to support homeless intervention and prevention.

In the past, the Urban County members have prioritized the use of CDBG funds for Americans with Disabilities Act (ADA) retrofit projects, mainly the removal of architectural barriers identified in existing public buildings and infrastructure. During the last Consolidated Plan

period, July 2015 to June 2020, ADA project funds in an aggregate amount of nearly \$3.5 million were awarded to 36 different projects sponsored by the Urban County. These projects included sidewalk "curb cuts," and other path-of-travel ADA barrier removal projects; library, park, and community center restroom ADA barrier removal; and community facility ADA barrier removal. Additionally, CDBG dollars financed rehabilitation or accessibility modifications for over 250 low-income and senior homeowners and renters. These projects are essential to the community's residents who are lower income, elderly or have disabilities, and therefore remain a high priority for the use of CDBG funds during the 2020-2025 Consolidated Plan period.

HOME funds are targeted to create and preserve affordable housing. During the past few years, as a result of the impacts of COVID-19, local disasters including fires and floods, many planned affordable housing projects that were awarded HOME funds were delayed, paused or cancelled. As a result, the Commission reprogrammed HOME funds from cancelled projects through the several substantial amendments to prior year and current year Action Plans. These HOME funds are now allocated to affordable housing projects that are making good progress and will meet the HOME grant expenditure deadlines.

#### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen input into this Action Plan was sought primarily through multiple virtual public hearings and meetings, engagement with cities and towns on jurisdictional needs and community outreach to encourage citizen participation. Notices of public meetings and public hearings were published to encourage community participation in the development of the Action Plan.

At the start of the COVID pandemic, the California Legislature passed AB 361 to streamline the requirements for virtual meetings under the Ralph M. Brown Act during times of declared emergency. The CD and CTAC committees have been holding entirely virtual meetings under the AB 361 rules since 2020. On February 28, 2023, the Governor of the state of California rescinded the Emergency Proclamation on February 28, 2023. As a result, as of March 1, 2023, the two committees resumed holding in-person meetings.

A draft of the Action Plan was made available from February 16, 2024, through March 18, 2024 for a 30-day public comment period. The draft was available on the Commission website and hard copies were available by request. The noticing was available in both English and Spanish and available on the County's website as well as social media platforms and distributed on the County's listserv via email and public postings.

5. Summary of public comments

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

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

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

All comments are accepted.

7. Summary

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

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	SONOMA COUNTY	Community Development Commission
HOME Administrator	SONOMA COUNTY	Community Development Commission
ESG Administrator	SONOMA COUNTY	Community Development Commission

Table 1 – Responsible Agencies

Narrative (optional)

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

Consolidated Plan Public Contact Information

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

### 1. Introduction

The Commission houses the Sonoma County Housing Authority and administers all affordable housing finance programs for the unincorporated County of Sonoma. The Commission actively participates in various collective action and community initiatives addressing the needs of lower-income members of the community, including, but not limited to, the Homeless Coalition Board (formerly known as the Continuum of Care Board), ACCESS Sonoma, the Renewal Enterprise District (RED), Health Action, and Upstream Investments. Because of these existing roles, the Commission is well-positioned to consult with private and public agencies about Consolidated Plan matters since the appropriate agency-to-agency relations are already in place.

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

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

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

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

The CoC Charter was revised in 2021 with a new 17-member Board more reflective of the CoC's geography. Beginning in January 2023 the Commission's Ending Homelessness division moved to the Sonoma County Department of Health Services which now serves as the CoC Lead Agency. Up until the reorganization of the Ending Homelessness division, the Commission lead, hosted and staffed the 17-member Homeless Coalition Board and fully integrated that role with other related Commission roles such as funder of homeless, housing, and community services, Homeless Management Information Systems (HMIS) administrator, and Coordinated Entry. The Homeless Coalition Board provides structure to the homeless system of care in order to make policy decisions and measure results for ending homelessness throughout the county. The meetings of the Homeless Coalition Board and its Committees and working groups help forge new connections and working relationships with many participants as well as responding to the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requirements and are all open to the public.

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 Commission consults with the Homeless Coalition Board on ESG funding recommendations. The Commission coordinates with the cities of Santa Rosa and Petaluma in allocating ESG funding in those cities, which lie within the geography of the CoC. The Commission's staff regularly coordinate with both staff and civic leaders in the cities of Santa Rosa and Petaluma, the State Department of Housing and Community Development, and the State Business, Consumer Services and Housing Agency not to mention with elected leaders of the County of Sonoma through study sessions, formal presentations, and informal consultations on

implementation of their Consolidated Plans and related matters of concern. The Commission follows CoC policies and guidelines on performance standards by evaluating projects on HUD System Performance Measures such as reducing length of time homeless, placement into and retention of permanent housing, increasing earned and other income, etc. Commission staff present recommendations to the full Homeless Coalition Board for consultation on annual basis and all projects are required to utilize HMIS and provide data on outcome measures such as housing placements and retention of housing and increase income.

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

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Table 2 – Agencies, groups, organizations who participated

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

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

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

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



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

10	Agency/Group/Organization	Fair Housing Advocates of Northern California
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Education Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Fair Housing Services
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Fair Housing Advocates of Northern California (FHANC) is the CDBG funded Fair Housing provider for the Urban County. The agency has provided training on Fair Housing. FHANCs primary services involve fair housing counseling, investigation, and enforcement to Sonoma County residents
11	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

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

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The BOOST program provides specialized technical assistance and business support for Family Child Care Home providers who run home daycares for children. Expansion of Childcare Services in the area.
14	Agency/Group/Organization	Sonoma County Continuum of Care
	Agency/Group/Organization Type	Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Health Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing and regular contact and invited to provide Plan input through public meetings or direct communication. The CoC is recognized leader in providing homeless services in the Urban County. The anticipated outcome of the consultation was improved coordination with a regional homeless services provider.

15	Agency/Group/Organization	Sonoma County Office of Emergency Services
	Agency/Group/Organization Type	Services - Victims Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - County
	What section of the Plan was addressed by Consultation?	Public Housing Needs Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Various planning, permitting, management, mitigation, and disaster response responsibilities are administered, coordinated and executed
16	Agency/Group/Organization	Social Advocates for Youth
	Agency/Group/Organization Type	Services - Housing Services-Children Services-homeless Services-Education Services-Employment Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	SAY has served more than 60,000 Sonoma County children, youth and families with the goal of preventing and ending homelessness. As a recipient of funding from the Community Development Commission for many years, SAY programming has evolved to mirror Federal and State legislation while meeting needs at the local level.
17	Agency/Group/Organization	The Living Room
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Living Room (TLR) has received city, county, state and federal funding as well a private grants to support programs, operations, capital and COVID related expenses.

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

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

Broadband Needs of Housing occupied by Low-and Moderate-Income Households -91.210(a)(4), 91.310(a)(2)

The 2020 Sonoma County Consolidated Plan identified the broadband needs of housing occupied by low- and moderate-income households. The following information summarizes the Sonoma County lead organizations and chronological actions to improve and expand broadband access to low- and moderate-income households and the community to eliminate the digital divide.

In 2019, the Sonoma County Economic Development Board and Magellan Advisors created the Sonoma County Broadband Strategic Plan, which analyzed the overall status of Sonoma County's telecommunications industry and provided the County with nine (9) actionable recommendations to increase competition and expand broadband access countywide.

In June 2020, the Sonoma County Economic Development Board initiated the development of a broadband action plan and formed Access Sonoma Broadband (ASB) to work with communities to close the digital divide. The mission of ASB is to help connect Sonoma County's unserved communities to fast, affordable, and reliable internet services. In June 2021, the Sonoma County Board of Supervisors approved the ASB Action Plan. The ASB states “the purpose of the plan is to explore the creation of a publicly governed broadband entity. This entity could deploy, own, and manage broadband infrastructure within Sonoma County, reducing the cost barriers for broadband providers, and closing the regional digital divide.” The ASB Action Plan includes a detailed analysis of the needs, resources, outreach and funding to increase access to broadband for low- and moderate-income households and the community. More information including copies of the ASB Action Plan in English and Spanish versions are available on the Sonoma County Economic Development Board website at <http://sonomaedb.org/Current-Projects/Broadband/>



## AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation outreach includes public meetings of the CD Committee, CTAC, the Homeless Coalition Board, and sub-committee working groups, public notices, emails, list serves, and the use of the Commission website, which is accessed by numerous community members and partners. The Community was also widely engaged following the 2017 and 2019 fires in Sonoma County and during surveying and focus group activities as part of the 2020 Assessment of Fair Housing process. These efforts were especially productive and generated much comment on the escalating cost of rental housing, the shortage of housing supply, the local homelessness situation, disparate impacts of disasters, fair housing concerns and the effects that the pandemic has had on protected classes, and other factors in the County.

One FY 2024-2025 CDBG ,HOME and ESG Funding Policies development meeting was held on September 20, 2023. This public meeting was conducted by the CD Committee and the CTAC to review the Consolidated Plan goals, CDBG, HOME and ESG requirements and Urban County needs. The committees held an in-depth discussion, and no public comments were received during these meetings.

The Committees also reviewed the draft FY 2024-2025 NOFA for CDBG, HOME and ESG at their concurrent meeting on November 15, 2023. Each year a NOFA is published to request funding proposals from qualified organizations for eligible activities identified in the Consolidated Plan. The NOFA includes the estimated amount of funds available, funding priorities, types of eligible activities and a schedule of important dates including proposal submittal deadlines, technical assistance workshop meetings, public hearings and public comment periods for the development of the Action Plan.

The NOFA was published on November 17, 2023, in both English and Spanish. Two technical assistance workshops were held on December 4, 2023, and December 7, 2023, as well as approximately 15 one-on-one meetings to provide information to potential applicants for CDBG, HOME and ESG funds and to answer any questions. Approximately 50 members of the public attended the





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	Internet Outreach	Non-English Speaking - Specify other language: Spanish  non-targeted/broad community	N/A	none	All comments were accepted	
5	Email List Serve	Non-English Speaking - Specify other language: Spanish  non-targeted/broad community	N/A	None	All comments were accepted	
6	Public Meeting	Non-targeted/broad community	38 members of the public attended the meeting		All comments are accepted	

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)
7	Internet Outreach	Non-English Speaking - Specify other language: Spanish  non-targeted/broad community	N/A	none	All Comments are accepted	

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

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

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Assistance is included in the use of funds column below, Commission does not use HOME funds for this purpose.

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	1,706,374	400,000		2,106,374	1,804,752	CDBG will be used for a variety of purposes including housing and capital projects and programs, ADA retrofit and other public facility/improvement projects and non-housing services. The Expected amount available for each funding source has been deducted from the 2020 Consolidated Plan each year leaving the Commission with an anticipated amount of \$1,804,752

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	858,495	35,000	0	893,495	858,495	HOME funds will be used to finance affordable rental housing development and preservation, and to provide tenant-based rental assistance



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	150,786	0	0	150,786	150,786	ESG funds will be used for Street Outreach and Homeless Prevention Programs

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Competitive McKinney-Vento Homeless Assistance Act	public - federal	Admin and Planning Rapid re-housing (rental assistance) Other	4,000,000	0	0	4,000,000	4,000,000	CoC funds will be used for permanent supportive housing projects that serve homeless persons, chronically homeless populations, and a small amount of rapid re-housing funding for victims of domestic violence. A small portion of funds will continue to be used to support mandated system infrastructure costs such as HMIS data systems, Coordinated Entry and CoC planning and management.

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: \$		
Section 8	public - federal	Rental Assistance	45,216,483	0	0	45,216,483	45,000,000	Section 8 funds are used for tenant based and project-based vouchers and are administered by the Sonoma County Housing Authority.

Table 5 - Expected Resources – Priority Table

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

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

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

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

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

In general, and historically, local government has frequently provided land for many affordable housing projects. The Commission currently owns a 6-acre parcel in the former Roseland Redevelopment Area. The County's department of General Services maintains a list of underutilized County properties as the discussion around utilizing publicly owned land continues.

Discussion

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## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2020	2025	Affordable Housing		Affordable Housing	CDBG: \$678,754 HOME: \$772,646 Section 8: \$45,216,483	Rental units constructed: 149 Household Housing Unit Homeowner Housing Rehabilitated: 61 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 2988 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2020	2025	Homeless		Homelessness	ESG: \$140,231 Competitive McKinney-Vento Homeless Assistance Act: \$4,000,000	Tenant-based rental assistance / Rapid Rehousing and Street Outreach: 213 Households Assisted Homelessness Prevention: 296 Persons Assisted
3	Non-Housing Community Development	2020	2025	Non-Homeless Special Needs Non-Housing Community Development		Non-Housing Community Development	CDBG: \$430,390	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4370 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 45 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

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

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## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

In FY 2024-2025, Sonoma County anticipates receiving \$1,706,374 in CDBG funds. CDBG funds will be used for affordable housing activities, fair housing services, public improvements, and public facilities, all of which must be awarded for projects and programs that affirmatively further fair housing. Federal regulations impose a 15 percent maximum cap on funding to be expended for public service activities, which are used by Sonoma County to support Fair Housing services. Administrative costs are limited to 20 percent of the total CDBG grant allocation and 20 percent of CDBG program income received.

In FY 2024-2025, Sonoma County anticipates receiving \$858,495 in HOME funds. HOME funds will be used to support affordable rental housing production, and tenant-based rental assistance. Federal regulations require a minimum of 15 percent of each year's HOME grant allocation to be set-aside for Community Housing Development Organizations (CHDO's). One local CHDO was recommended for these funds for an affordable rental housing development.

In FY 2024-2025, Sonoma County anticipates receiving \$150,786 in ESG funds. This year, three Community Based Organizations proposals were recommended for funding.

#### Projects

#	Project Name
1	CDBG - General Administration
2	ESG 24 Sonoma County
3	2023 Affordable Housing
4	CDBG 2024 Public Facilities and Infrastructure Improvements
5	CDBG 2024 Fair Housing and Housing Justice Program
6	2024 HOME Administration

Table 7 - Project Information

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

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

2020-2025 Consolidated Plan goals.

The projects will meet the policy goals approved by the Homeless Coalition Board and will comply with the regulatory requirements, especially meeting defined objectives of each funding source and timely spending of awarded funds.

The County has adopted a 5-year Strategic Plan to address homelessness with the goal of being able to create 1200 Permanent Supportive Housing (PSH) units.

Key barriers to addressing underserved needs continues to be the lack of PSH units, affordable housing, and funding for supportive services.

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## AP-38 Project Summary

### Project Summary Information

1	Project Name	CDBG - General Administration
	Target Area	
	Goals Supported	Affordable Housing Non-Housing Community Development
	Needs Addressed	Affordable Housing Non-Housing Community Development
	Funding	CDBG: \$341,274
	Description	CDBG grant planning and administration activities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Urban County
	Planned Activities	21A General Program Administration
2	Project Name	ESG 24 Sonoma County
	Target Area	
	Goals Supported	Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$150,786
	Description	\$140,231 will be awarded to three Community Based Organizations \$60,000 will be awarded for Street Outreach and rapid re-housing services and \$80,231 will be awarded for Homeless Prevention Services and \$11,308 will go to ESG Administration. If ESG funds come available from a project that cannot proceed West County Community Services Homelessness Prevention and the West County Outreach program will be contingency projects up to their full requested amounts. These two projects are currently only partially funded.
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	512 Individuals supported by street outreach rapid rehousing and homeless support services
	Location Description	Countywide
	Planned Activities	Homelessness Prevention and Rapid Rehousing
3	Project Name	2024 Affordable Housing
	Target Area	
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$678,754 HOME: \$772,646
	Description	CDBG funds will be used to support affordable housing activities, including housing rehabilitation and housing accessibility modifications for disabled households. HOME Funds will be used to create affordable housing opportunities through construction of new affordable rental units and by providing Tenant-Based Rental Assistance for low-income individuals the breakout is as follows: Construction of Housing Burbank Housing will receive \$203,871 in HOME funds and \$128,775 in HOME CHDO funding to develop 29 units of affordable housing in Sebastopol- 12 Construction of Housing & 12 Construction of Housing Mid-Peninsula The Farm will receive \$353,754 in CDBG funds for eligible site clearance and demolition. expenses to an affordable housing development for 72 units of affordable housing in Sonoma 12 Construction of Housing Jamboree Housing Corporation will receive \$340,000 in HOME funds for Construction of 48 units of affordable housing in Healdsburg, The Sonoma County Housing Authority will receive \$100,000 in HOME funding for tenant based rental assistance. 14A Rehab: Single-Unit Residential The Commission will receive \$250,000 an anticipated CDBG Program Income for the Low & Moderate Income Clientele. 14A Rehab Disability Services and Legal Center will receive \$75,000 in CDBG funds for Home Access Modifications for Low- & Moderate-Income Clientele. If HOME funds come available from a project that cannot proceed Elderberry Commons, a 29-unit permanent supportive housing project in Sebastopol will receive the funds as a contingency project for construction.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	17 households will receive Tenant Based Rental Assistance 149 households will have access to new affordable housing 61 low/mod residents will receive housing rehabilitation and accessibility improvements
	Location Description	Urban County
	Planned Activities	
4	Project Name	CDBG 2024 Public Facilities and Infrastructure Improvements
	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$430,390
	Description	CDBG funds will be used to improve public facilities and public infrastructure to meet the demands of residents in low- and moderate income (LMI) areas or to meet the needs of Low Moderate-Income Clientele (LMC) in the Urban County. This will include ADA accessibility improvements and infrastructure updates. Non-Housing public services to low -and moderate-income Daycare Providers and their Low-and moderate-income clientele
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4,415 Low Income Individuals including 981 disabled individuals
	Location Description	Urban County

	Planned Activities	<p>ADA improvements and barrier removal for sidewalks in low-moderate income areas. Non-Housing Public Service activities to Low-and moderate-income daycare providers and their Low- and moderate-income clientele.</p> <p>The City of Cloverdale will receive \$250,000 in CDBG funds for Infrastructure Activities (architectural barrier removal) that will benefit low- and moderate-income limited clientele 03F</p> <p>Community Child Care Council of Sonoma County will receive \$180,390 in CDBG funding. The Build Up Child Care Program is classified as a Non-Housing Public Services project that supports Low- and Moderate-Income (LMI) families with essential childcare services.18C</p>
5	Project Name	CDBG 2024 Fair Housing and Housing Justice Program
	Target Area	
	Goals Supported	Non-Housing Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$255,956
	Description	Funds will be used to support a Fair Housing and legal services to provide eviction defense for residents and housing stabilization.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Urban County
	Planned Activities	<p>Legal Aid Housing Justice program will receive \$155,956 in CDBG funds for 05J Fair Housing Activities</p> <p>Fair Housing Advocates of Northern California will receive \$100,000 in CDBG funds for Fair Housing Activities</p>
6	Project Name	2024 HOME Administration
	Target Area	
	Goals Supported	Affordable Housing

Needs Addressed	Affordable Housing
Funding	HOME: \$85,849
Description	Administration of the 2023 HOME Program
Target Date	6/30/2025
Estimate the number and type of families that will benefit from the proposed activities	N/A
Location Description	Urban County
Planned Activities	General Program Administration of the HOME program

## AP-50 Geographic Distribution – 91.220(f)

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

This FY 2024-2025 Action Plan, Year 5, encompasses activities undertaken by the County of Sonoma, and within the seven municipalities comprising the HUD entitlement Urban County: Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor. Sonoma County does not dedicate funds to target areas.

### Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

### Discussion



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

Below are the anticipated numbers of households that will be supported through the FY 2024-2025 Action Plan.

One Year Goals for the Number of Households to be Supported	
Homeless	245
Non-Homeless	296
Special-Needs	7
Total	548

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	17
The Production of New Units	149
Rehab of Existing Units	61
Acquisition of Existing Units	0
Total	227

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

#### Discussion

Burbank Housing Development Corporation plans to substantially rehabilitate a previous motel into a 100% affordable 29-unit family rental housing project in Sebastopol. All of the units are permanent supportive housing and will be restricted to extremely low, very low- and low-income households.

Mid-Peninsula The Farm Inc plans to build a 100% affordable 72-unit multifamily rental housing project in Sonoma. All of the units will be restricted to households between 30% and 60% of the area median income (AMI), 15% of the units are proposed to be accessible. These funds are for site clearance and demolition.

Jamboree Housing Corporation plans to build a 48-unit multifamily rental housing project in Healdsburg. All of the units will be restricted to households between 30% and 60% of the area

median income (AMI), 12 of the units are proposed to be accessible.

The Sonoma County Housing Authority will provide tenant-based rental assistance to 17 vulnerable households.

The Commission's Housing Rehabilitation program will complete rehabilitation and earthquake retrofits to at least 54 homes for low-income seniors and residents with disabilities. This project will be funded using program income funds and prior year unused funds. This project is also listed as a contingency project if additional funding becomes available.

Disability Services & Legal Center will complete 7 home access modifications for low-income seniors and residents with disabilities.

Elderberry Commons, a 29-unit permanent supportive housing project in Sebastopol developed by the Burbank Housing Development Corporation will receive funds as a contingency project for construction if HOME funds come available from a project that cannot proceed.

## AP-60 Public Housing – 91.220(h)

### Introduction

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

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

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

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

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

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

HUD has designated the Sonoma County Housing Authority as a "high performer" agency for the past 24 years consecutively.

### Discussion

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

### Introduction

The County combines ESG-CV, California Emergency Solutions and Housing (CESH), \$4.14 million in State Homeless Housing Assistance and Prevention (HHAP) 3 program funds and other State and local funding allocations into a consolidated funding process for Homeless Services programs. Homeless services funding priorities focus on interventions that demonstrably impact the CoC's system-wide Performance Measures.

In addition to the funding described above, another \$5 million annually in CoC funding is used to address homelessness. The County has entered into an agreement with the California Department of Housing and Community Development to act as Administrative Entity for a \$213,044 allocation of the balance of State ESG funds (for the non-ESG entitlement jurisdictions of Santa Rosa and Petaluma) plus CESH, a State-funded program with eligible uses similar to ESG.

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

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

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

The CoC follows HUD System Performance Measures (SPM) in goals and actions for reducing and ending homelessness. Additionally, the CoC finalized a Strategic Plan in 2022 that was formally endorsed by the Homeless Coalition Board and the Board of Supervisors. This plan follows both HUD SPM as well as the Local Homeless Action Plan developed for the State of California in 2022.

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

the county, and all outreach teams work collaboratively. Street outreach teams work closely with the Coordinated Entry System, which provides standardized assessment and housing placement for all homeless populations.

In FY 2023-24, \$325,651 in combined State and local funds supported the HOST project to enable the HOST Team to reach 641 unsheltered persons throughout the Urban County, including underserved areas such as the Sonoma Valley; outreach to transition age youth has been expanded to serve up to 127 unsheltered youth with \$211,542 in combined State and local funds. In addition to these investments, a combined \$487,367 has been allocated to targeted outreach activities in rural areas of the Urban County. The IMDT/HEART teams also support work county-wide, particularly in the Urban County and were supported with \$1.1 million in Federal ESG-CV funding.

Per the Homeless Action Plan finalized by the State of California Local Interagency Council on Homelessness in 2022, the CoC and County has a goal of reducing homelessness by 10% over one year. Strategies outlined in the plan to support this include:

With the goal of creating 200 more units of PSH each year for five years, and 200 more units of Interim Housing for the next two years, the CoC and County will leverage Cal-AIM, Cal-AIM's HHIP funds, Sonoma County Measure O funds, Encampment Resolution funds, Project Homekey, CDBG funds, and Housing Vouchers (among other sources).

Addressing the emergency shelter and transitional housing needs of homeless persons

The focus of Sonoma County's emergency shelter and transitional housing programs is establishing safety through trauma-informed care, to stabilize and more quickly house participants. In addition, local, and State Homeless Housing Assistance Program (HHAP) funds were allocated to support 249 children and their families at Catholic Charities' 138-bed Family Support Center. In FY 2023-24 the Commission used ESG, CDBG-CV and local funds to support 67 women and children at Community Action Partnership's 22-bed Sloan Women's Shelter; 154 individuals at the Homeless Action Sonoma Home and Safe Center, and 30 Individuals at the Sonoma Applied Villages Horizon Shine Center—all of which serve the Urban County

Per the Local Homelessness Action Plan, the primary goal in addressing shelter and transitional housing needs of homeless persons include the following two goals:

Adding 200 units of interim housing units on an annual basis as well as enhancing support services for individuals experiencing homelessness by strengthening the system of care and safety net. This includes strengthening of the quality and performance of housing and services

programs by: Improve our supportive services provider network by (among other things): 1 - Right-sizing wages and benefits (we are losing too many individuals from this field, and housing costs are high here); 2 - Setting minimum qualifications for supportive services staff cohorts/assignments; 3 - Encouraging service provider peer support networks; and 4 - Set and maintain caseload ratio goals for programs.

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

Permanent supportive housing is the key service intervention for chronically homeless persons and for ensuring they do not become homeless again. Permanent supportive housing is also the Sonoma County system of care's greatest need, and therefore the homeless services competitive funding cycle prioritizes permanent supportive housing capital development, services, and operations above all other uses, as long as these are eligible expenses. In FY 2023-24, the Commission allocated ESG-, with other local funds, for one Rapid Re-Housing project (operated by TLC Child and Family Services) that will serve up to 3 households. Local and State funds which will support Rapid Re-Housing assistance for another 270 households throughout the Urban County. Local and State HHAP funds for the cost of services and housing operations at eight permanent supportive housing projects serving 310 persons in Cotati, Cloverdale, Rohnert Park, Santa Rosa, and Sebastopol. Funding for supportive services and housing operations provided by Catholic Charities, Community Support Network, COTS, Reach for Home, and West County Community Services. In addition, the Commission acts as a collaborative applicant for \$4.1 million in CoC funding, which supports permanent supportive housing for approximately 260 formerly chronically homeless persons throughout Sonoma County.

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

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

receive a Housing Choice Voucher. This program was still in operation in FY 2023-24.

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

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

As detailed in the Local Homeless Action Plan and Strategic Plan, the primary goal is to the number of people exiting homelessness into permanent housing by 10% on an annual basis (from the baseline of 1006 exits annually, resulting in 1106 annual exits). Strategies include:

Redesign the CE assessment and prioritization process by end of 2023 to place more individuals into permanent housing, with a focus on racial equity. In 2024, review whether the new assessment and prioritization process has resulted in equity-responsive housing placements, especially for the Black and Native American community. By the end of 2024, housing placements and referrals from Coordinated Entry would be made in proportion to the racial and ethnic identification of the Sonoma County homeless population.

20% increase in landlords accepting persons with housing vouchers on an annual basis and finalization of a single By Names List by the end of 2023.

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

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

homelessness. Youth providers, including Social Advocates for Youth, provide homelessness prevention services and work closely with Commission staff to prevent transition age youth from becoming homeless.

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

Outcome goals, as detailed in the Local Homeless Action Plan and Continuum of Care Strategic Plan include a 3% decrease in the number of people who become newly homeless on an annual basis from the baseline of 1,570 as well reducing the length of time people remain homeless by 10% on an annual basis from the baseline of 127 days. Strategies to achieve this, as defined by the Continuum of Care and County include:

Strategies to achieve this goal include:

Regionalizing our street outreach efforts with local By Names Lists that roll up into one single BNL and reorienting our CE process to focus on housing placement (versus shelter placement). We will be starting up a centralized housing location service with our Housing Authorities. We will be mapping out entries to the system from the justice system and from hospitals to remove places where residents fall through the cracks. In 2023, we will inventory our region's prevention activities, review appropriateness, and implement improvements in 2024.

## Discussion

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



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

### Introduction:

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

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

As mentioned in the Market Analysis of the Consolidated Plan, the State of California requires each jurisdiction’s General Plan Housing Element to identify constraints to housing development and to identify measures the jurisdiction will undertake to ameliorate those constraints. SP- 55 of the Consolidated Plan provides a list of the type of measures likely to be undertaken by one or more of the individual jurisdictions. Because the Urban County is comprised of eight different jurisdictions, seven municipalities plus the County of Sonoma, it is not possible to identify the cumulative measures planned by the eight jurisdictions for FY 2024-2025. However, each jurisdiction has a Housing Element that identifies its various programs and actions steps specific to their communities. The websites for these Housing Elements are listed in MA-40 and SP-55 of the 2020-2025 Consolidated Plan.

In 2021, Sonoma County and each of the seven cities in the Urban County initiated the development of their new Housing Elements and most jurisdictions have now submitted their Housing Element for review by the California Department of Housing and Community Development (HCD). Approval of each jurisdiction’s document by HCD were complete in 2023. The updated Housing Elements generate new housing goals and programs based on the Regional Housing Needs Allocation. Each updated document includes a robust Affirmatively Furthering Fair Housing (AFFH) analysis identifying the impediments, needs, and strategies of each jurisdiction to expand housing opportunities to all households regardless of income, race, or ethnicity . The Commission in partnership with the cities of Santa Rosa and Petaluma is near completion to update the Analysis of Impediments/Assessment of Fair Housing in conjunction

with the AFFH process that evaluates barriers to housing opportunities and affordable housing for marginalized communities countywide. This update is expected to conclude in the Spring of 2024.

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

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

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

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

Over the next year, the Urban County will begin to implement some of the new Housing Elements programs that will improve processes and services for development of new housing,

including preservation of affordable housing stock, as well as fair housing services. Additionally, the Urban County and cities of Santa Rosa and Petaluma will be completing the Assessment of Fair Housing report. Part of the Assessment includes setting Fair Housing Goals and Priorities. A sample of the goals include increasing the supply of affordable housing in higher opportunity areas and areas with ongoing or threatened displacement, meet the housing and services needs of migrant and year-round farmworkers, reducing zoning and land use barriers to the development of affordable housing, and preventing displacement by preserving affordable housing and protecting tenant's rights. All jurisdictions within the Urban County will begin to implement programs to affirmatively further fair housing.

Discussion:

## AP-85 Other Actions – 91.220(k)

### Introduction:

All of the projects recommended for funding under this FY 2024-2025 Action Plan address one or more of the obstacles to meet underserved needs delineated in the Consolidated Plan. The projects recommended for funding in FY 2024-2025 also take into account the impact of the 2017 and 2019 fires and the COVID pandemic on vulnerable populations. Also, the County of Sonoma has committed County General Funds to support programs that serve the needs of the most vulnerable in the community through the County Fund for Housing (CFH). The Commission has allocated the maximum amount of income from its former redevelopment assets that are allowable under State Redevelopment Law to rapid re-housing and homelessness prevention services. The County also received approximately \$4.7 million in the 2020-21 Fiscal Year in CDBG-DR funds from the State in response to the 2017 Federally declared disasters. Projects and programs recommended for funding demonstrate efficiencies to best utilize the decreasing amounts of funding available to support their endeavors. Affordable housing projects recommended for funding are based on readiness to proceed and innovative approaches to overcoming regulatory barriers and provide or preserve both rental and homeownership housing opportunities for lower-income persons, especially households at risk of homelessness. Housing rehabilitation projects serve low-income homeowners, who are often elderly or disabled. Loans provided to these households help to keep them from becoming homeless and preserve the existing affordable housing stock. Emergency rental assistance and family self-sufficiency activities enable lower-income individuals and families to obtain and retain rental housing in the high-priced market in Sonoma County. The high cost of housing is a contributing factor in the County's homeless population, especially following the October 2017 fires which exacerbated an already tight rental market. The emergency shelter, transitional housing, permanent supportive housing, and homelessness prevention and rapid re-housing assistance recommended for funding assist those in need to move as quickly as possible towards stable, permanent housing.

### Actions planned to address obstacles to meeting underserved needs

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

The 2023 Point-in-Time Homeless Count showed that the total number of people experiencing

homelessness on any given night in Sonoma County decreased from the 2020 Point-in-Time Homeless Count. Following the 2017 fires, the County's Homeless Count has included a telephone survey to learn about people who are living in unstable situations. These are people who are couch surfing or doubled up, or who have no lease. People living in these situations are the most at risk of becoming homeless. The study showed that approximately 21,725 County residents are living in these unstable situations – 7% of County households. More than half of these lost their housing as a direct result of the fires or due to the fires' economic impact. The annual homeless count, along with the new telephone survey suggest a new wave of people are already becoming homeless as they exhaust their resources following the fires. Thousands more are at risk.

In December 2019, in response to a massive encampment and public health emergency along one of the County Parks department's biking trails, the Sonoma County Board of Supervisors made a range of new investments to expand permanent supportive housing, temporary shelter, and supportive services appropriate to the needs of unsheltered and vulnerable persons. These investments represented an unprecedented collaboration between County agencies to address underserved needs. The efforts began as a result of the encampment clearing, and State declared homeless emergency continues into 2023-24 with a sense of collaboration continuing as the hallmark of the County response.

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

Actions planned to foster and maintain affordable housing

In response to *Sonoma County's 2011 Analysis of Impediments to Fair Housing Choice* report which cited the lack of affordable housing as a barrier to fair housing choice, the Community Development Commission will continue to use its CDBG, HOME and ESG funding to support projects that increase the supply and improve the conditions of affordable housing for lower-income persons. In addition, in FY 2024-2025, the Commission has committed its 15% CDBG public services set-aside to support fair housing services, that includes eviction defense. Staff is working with partners to ensure that the scope of contracted fair housing providers is responsive to the needs identified in the 2011 Analysis of Impediments and reflects fair housing program best practices. Furthermore, the Commission is in the process of its *2020 Assessment of Fair Housing* to thoroughly examine fair housing issues in the community including segregation, disparate impact of local policies on protected classes, and disparate access to

education, jobs, and transportation, and housing.

#### Actions planned to reduce lead-based paint hazards

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

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

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

#### Actions planned to reduce the number of poverty-level families

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

work closely with organizations that prioritize upstream investments.

#### Actions planned to develop institutional structure

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

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

The Sonoma County Housing Authority continues to strengthen the Housing Choice Voucher program's effectiveness by engaging a large array of stakeholders in setting the Housing Authority's policies and practices. In 2022, the Housing Authority hired a full-time Housing Locator who is dedicated to cultivating relationships with landlords thereby providing additional housing opportunities for low-income families served through the various Housing Authority programs. The Housing Authority also received a grant from the County of Sonoma to develop and implement a robust centralized housing location program, Community Housing Connector. This program will provide several benefits to landlords including landlord incentives, risk mitigation funds, and deposit assistance. Through the Homeless System Redesign and the reformation of the Homeless Coalition Board in late 2020, the homeless system of care is continuing to increase efforts to coordinate funding decisions and policies. This effort increased collaboration among the County, City of Santa Rosa, City of Petaluma, the County departments of Health Services and Human Services, and virtually all housing and homeless service providers throughout Sonoma County. These will strengthen the homeless system of care's performance on System Performance Measurements such as reducing the length of homeless episodes, reducing returns to homelessness, increasing placements in permanent housing, and increasing participant incomes.

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

by contacting the Department of Health Services.

The Commission will strengthen internal systems to aid transparency, improve public engagement, and ensure maximum leverage of scarce public resources. The Commission will improve grant administration practices, develop and update CDBG, HOME and ESG policies and procedures and increase staff training on CDBG, HOME and ESG programs.

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

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

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

Discussion:

RESILIENCE: Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources and emergency management agencies.

Various planning, permitting, management, mitigation, and disaster response responsibilities are administered, coordinated and executed by multiple departments and agencies and include



the following:

- Sonoma County Water Agency
- Permit & Resource Management Department (land use management and permitting)
- Department of Emergency Management (disaster response activities)
- Sonoma County Community Development Commission (disaster mitigation activities)
- Sonoma County Agricultural and Open Space District (owns & manages public lands)
- Regional Parks Department (owns & manages public lands)

## Program Specific Requirements

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

Introduction:

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

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

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

#### Other CDBG Requirements

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

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(l)(2)

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

Annual Action Plan	66
2023	

92.205 is as follows:

No other forms of investment will be used in the FY 2024-2025 Action Plan.

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

Not applicable. The County does not fund homebuyer activities with HOME funds.

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

Not applicable

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

No HOME funds will be used for this purpose in the FY 2024-2025 Action Plan.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

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

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

Fiscal Year 2024-25 Emergency Solutions Grant Funding Policies

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

The Sonoma County CoC's Coordinated Entry System (CES) provides entry into housing via numerous access points for individuals, youth, and families experiencing homelessness with a goal of providing participants with their choice of housing, shelter or services within 60 days of program enrollment. Since January 2018, Coordinated Entry has been the primary process for assessing severity of needs and ensuring that people experiencing homelessness can receive assistance in a timely fashion. Coordinated Entry covers the entire geography of the Sonoma County CoC and is the primary access point for referrals for permanent supportive housing and rapid re-housing as well as emergency crisis services/emergency shelter. The Commission provides funding to the Coordinated Entry Operator, Home First. Primary oversight of the Coordinated Entry System is performed by the CoC Coordinated Entry Advisory Committee. The fully compliant Coordinated Entry Policies and Procedures adopted by the Homeless Coalition Board in January 2018 are attached to this Action Plan.

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

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

The Commission allocates ESG funds (as well as local discretionary funds and a range of State funding) through a single competitive funding process governed by the Funding Policies. This allocation and contract administration function is staffed by the Commission's staff. CoC consultation is achieved through a recommendation process for all applications that are eligible for ESG funds, conducted by the Commission. HEARTH Act and Home

Sonoma County policies, goals, and objectives—including standards for allocation of ESG funds—are fully integrated into the entitlement fund allocation process.

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

The County meets this requirement as two representatives on the CD Committee are persons with recent lived experience of homelessness.

5. Describe performance standards for evaluating ESG.

The Commission staff follows the same procedures in monitoring and evaluating all homeless services awards, including those funded with ESG and Low Moderate Income Housing Assistance Funds. Minimally, all awardees are required to complete a 'desktop monitoring' process (respond to an in-depth questionnaire); all ESG awardees are monitored on site each year. When ESG-funded programs are monitored, HEARTH Act performance measures and ESG policies and criteria are included in the overall monitoring. The FY 2024-25 Funding Policies for Homeless Services required scoring of projects based on performance in the areas of temporary or permanent housing placement (for street outreach and day center projects), permanent housing placement (for shelter and rapid re-housing projects), and permanent housing retention (for permanent supportive housing projects). The policies set benchmarks for expected performance based on the 2016 System Performance Measures, broken out by program type as follows:

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