HOME Investment Partnerships Program
American Rescue Plan

DRAFT
HOME-ARP ALLOCATION PLAN
May 4, 2022
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DRAFT
HOME-ARP ALLOCATION PLAN

HOME Investment Partnerships (HOME) Program
American Rescue Plan
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CITY COUNCIL

STEVEN D. HOFBAUER
Mayor

RICHARD J. LOA
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Councilmember

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<table>
<thead>
<tr>
<th>No.</th>
<th>Summary of Changes</th>
<th>Date/Time</th>
<th>sent to HUD for Approval</th>
<th>Approved by HUD</th>
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<tr>
<td>1</td>
<td>Published Draft for Public Comment:</td>
<td>4/1/22</td>
<td>TBD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Conducted Public Hearing:</td>
<td>5/4/22</td>
<td>TBD</td>
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<tr>
<td></td>
<td>Original HOME-ARP Allocation Plan.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Public Contact Information

Neighborhood Services Department  
Attn: Sophia Reyes, Housing Manager  
38250 Sierra Highway  
Palmdale, CA 93550  
661-267-5126  
[https://cityofpalmdale.org/270/Housing](https://cityofpalmdale.org/270/Housing)
Executive Summary

The City of Palmdale has been allocated $2,093,986 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan that will become part of the City’s PY2021 HUD Annual Action Plan by substantial amendment.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the City engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 30-day public comment period, and a public hearing.

The needs assessment and gap analysis identified the following needs and gaps within the City:

- In January 2020, the annual Point in Time (PIT) count revealed that 48 people were residing in emergency housing, either in shelter or transitional housing. Another 237 people were unsheltered on the streets, in tents or makeshift shelters, or in cars, vans, RVs or campers.
- 2014-2018 CHAS Data from HUD reported 5,575 households with incomes at or below 30% AMI are at risk of homelessness in the City.
- The 2014-2019 HUD CHAS data indicates there are 6,115 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability.
- The CHAS data reports that there are 2,805 households with incomes more than 30 and but equal to or less than 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD.
- The greatest need for supportive services is in the areas of Job training and employment services, housing search and housing counseling services, childcare assistance, mental health services, outreach services, and case management services.

To address these needs within the community the City will continue to fund the development and support of affordable housing, tenant-based rental assistance (TBRA), and supportive services through HUD funding available to the City, including annual allocations of CDBG and HOME and focus this new allocation of HOME-ARP funds towards the development of non-congregate shelter units.
Introduction

The City of Palmdale has been allocated $2,093,986 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation the City of Palmdale must develop a HOME-ARP Allocation Plan that will become a part of the City’s PY2021 HUD Annual Action Plan by substantial amendment. The HOME-ARP Allocation Plan must include the following:

1. A summary of the consultation process and the results of consultation;
2. A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reason why;
3. A description of HOME-ARP qualifying populations within the jurisdiction;
4. An assessment of unmet needs of each qualifying population;
5. An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
6. A summary of planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
7. An estimate of the number of housing units for qualifying populations the City will produce or preserve with its HOME-ARP allocation;
8. A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population;
9. HOME-ARP Refinancing Guidelines; and

The following entities are responsible for preparing the Allocation Plan and those responsible for administration of the HOME-ARP grant.

Table 1 – Responsible Agencies

<table>
<thead>
<tr>
<th>Agency Role</th>
<th>Name</th>
<th>Department/Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOME Administrator</td>
<td>City of Palmdale</td>
<td>Neighborhood Services Department / Housing Division</td>
</tr>
</tbody>
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HOME-ARP Eligible Qualifying Populations and Activities

HUD’s CPD Notice 21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program establishes the requirements for funds appropriated under section 3205 of the
American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

The American Rescue Plan Act (ARP) defines qualifying individuals or families, including Veterans, that are:

1. Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act;
2. At risk of homelessness, as defined in section 401 of the McKinney-Vento Homeless Assistance Act;
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Part of other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would:
   a. Prevent a family's homelessness;
   b. Serve those with the greatest risk of housing instability.

HOME-ARP funds may be used benefit qualifying populations through:

1. Tenant-based Rental Assistance (TBRA);
2. Development and support of affordable housing;
3. Provision of supportive services;
4. Acquisition and development of non-congregate shelter;
5. Nonprofit capacity building and operating assistance; and
6. Program planning and administration.
Stakeholder Consultation and Public Participation

HUD requires each HOME-ARP Participating Jurisdiction to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address fair housing, civil rights, and the needs or persons with disabilities.

HUD also requires that each Participating Jurisdiction provide opportunities for the public to comment on the proposed Allocation Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the City may undertake.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the City engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 30-day public comment period, and a public hearing.

Stakeholder Consultation

The City of Palmdale consulted with representatives from multiple agencies, groups, and organizations involved in the development of affordable housing, addressing homelessness, and the provision of services to qualifying populations in preparing this HOME-ARP Allocation Plan.

A virtual session was held March 3, 2022. Representatives from multiple agencies, groups, and organizations were invited via email to attend. Those unable to attend were invited to submit written comments via emails or schedule a phone call to share their thoughts.

The virtual consultation session included an overview of the HOME-ARP notice to inform attendees of the qualifying populations and eligible activities, an opportunity to ask clarifying questions, a request for input into needs and gaps, and priority populations and activities, and an overview of the Allocation Plan timeline and process.

A survey instrument was designed and available online and invited representatives from multiple agencies, groups, and organizations to rank the qualifying populations and eligible activities and services in order of perceived need, and the best approach for carrying out those activities for the community.
The Los Angeles Homeless Services Authority (LAHSA), the lead agency for the Los Angeles Continuum of Care (CoC), held a virtual session to provide their recommendations to jurisdictions being allocated funds. That session was held February 6, 2022, and attended by staff and representatives of the City. LAHSA also provided a written memorandum outlining their HOME-ARP funding recommendations.

The City’s virtual session was attended by 19 representatives of 14 agencies. The survey was completed by 27 representatives of seven agencies. All HUD-required agency types were represented in either the virtual session or the online survey.

**Organizations Consulted by Type and Method**

<table>
<thead>
<tr>
<th>Organization Consulted</th>
<th>Type of Organization</th>
<th>Method of Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACLU</td>
<td>Nonprofit, addresses needs of qualifying populations including civil rights</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Advancing Communities Together (ACT)</td>
<td>Nonprofit, addresses needs of qualifying populations</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Antelope Valley Domestic Violence Center dba Valley Oasis</td>
<td>Nonprofit, addresses needs of qualifying populations including domestic violence victims, lead agency on coordinated entry system (CES)</td>
<td>Virtual Session, Survey, Email</td>
</tr>
<tr>
<td>Antelope Valley Partners for Health (AVPH)</td>
<td>Nonprofit, addresses needs of qualifying populations</td>
<td>Virtual Session, Survey</td>
</tr>
<tr>
<td>AV Vets 4 Veterans</td>
<td>Nonprofit, addresses needs of qualifying populations including veterans</td>
<td>Survey</td>
</tr>
<tr>
<td>Dolores Huerta Foundation</td>
<td>Nonprofit, addresses needs of qualifying populations</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Hope of the Valley</td>
<td>Nonprofit, addresses needs of qualifying populations</td>
<td>Virtual Session, Survey</td>
</tr>
<tr>
<td>Housing Authority of the City of Palmdale</td>
<td>Public, addresses needs of qualifying populations, serves as public housing authority</td>
<td>Virtual Session, Survey</td>
</tr>
<tr>
<td>Housing Rights Center</td>
<td>Nonprofit, addresses needs of qualifying populations including disabled, provider fair housing services to the City</td>
<td>Virtual Session</td>
</tr>
<tr>
<td>Los Angeles Homeless Services Authority (LAHSA)</td>
<td>Nonprofit, addresses needs of qualifying populations including homeless</td>
<td>Agency-Sponsored Virtual Session</td>
</tr>
<tr>
<td>Mental Health America of Los Angeles</td>
<td>Nonprofit, addresses needs of qualifying populations including veterans</td>
<td>Virtual Session, Survey</td>
</tr>
</tbody>
</table>
Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

Development and support of affordable housing. Participants in the virtual session discussed the need for additional affordable housing. Specific issues mentioned included the shortage of affordable housing inventory; shortage of affordable housing available to voucher holders; and competition favoring those that can meet extreme income requirements, applicants without children, and those with steady jobs. Of respondents to the survey, 78% believed there was a high need for this activity.

Acquisition and development of non-congregate shelter. Many participants mentioned the need for shelter in general and for specific populations including families, those fleeing domestic violence and other situations, people with service animals, the elderly and single people. Of respondents to the survey, 59% believed there was a high need for this activity.

Provision of supportive services. Many examples of supportive services were mentioned in the virtual session including fair housing, mental health services, credit repair services, housing counseling, substance abuse services, and eviction defense. Survey respondents were asked to rate what they believed is the current need for various services eligible under HOME-ARP. Of respondents to the survey, 48% believed there was a high need for this activity. The activities with the most ratings for “high need” were job training and employment services (81%), housing search/counseling and childcare services (70%), and mental health services, outreach services, and case management (67%). (see table 3 below)

<table>
<thead>
<tr>
<th>Supportive Services</th>
<th>High Need</th>
<th>Moderate Need</th>
<th>Low Need</th>
<th>No Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Child Care Assistance</td>
<td>70%</td>
<td>26%</td>
<td>0%</td>
<td>4%</td>
</tr>
<tr>
<td>Education Services</td>
<td>63%</td>
<td>30%</td>
<td>7%</td>
<td>0%</td>
</tr>
<tr>
<td>Job training and employment services</td>
<td>81%</td>
<td>19%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Food assistance</td>
<td>56%</td>
<td>22%</td>
<td>22%</td>
<td>0%</td>
</tr>
</tbody>
</table>

Table 3 – Rating of Current Need for Supportive Services
<table>
<thead>
<tr>
<th>Service</th>
<th>Allocation 1</th>
<th>Allocation 2</th>
<th>Allocation 3</th>
<th>Allocation 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing search and counseling services</td>
<td>70%</td>
<td>30%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Legal services</td>
<td>41%</td>
<td>44%</td>
<td>11%</td>
<td>0%</td>
</tr>
<tr>
<td>Mental health services</td>
<td>67%</td>
<td>30%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Outpatient health services</td>
<td>52%</td>
<td>30%</td>
<td>11%</td>
<td>4%</td>
</tr>
<tr>
<td>Outreach services</td>
<td>67%</td>
<td>15%</td>
<td>11%</td>
<td>4%</td>
</tr>
<tr>
<td>Substance abuse treatment</td>
<td>52%</td>
<td>37%</td>
<td>4%</td>
<td>0%</td>
</tr>
<tr>
<td>Transportation assistance</td>
<td>59%</td>
<td>33%</td>
<td>7%</td>
<td>0%</td>
</tr>
<tr>
<td>Case management services</td>
<td>67%</td>
<td>22%</td>
<td>7%</td>
<td>0%</td>
</tr>
<tr>
<td>Mediation services</td>
<td>19%</td>
<td>41%</td>
<td>33%</td>
<td>4%</td>
</tr>
<tr>
<td>Credit repair services</td>
<td>37%</td>
<td>41%</td>
<td>15%</td>
<td>4%</td>
</tr>
<tr>
<td>Landlord/tenant liaison services</td>
<td>44%</td>
<td>44%</td>
<td>7%</td>
<td>0%</td>
</tr>
<tr>
<td>Services for special populations</td>
<td>48%</td>
<td>48%</td>
<td>4%</td>
<td>0%</td>
</tr>
<tr>
<td>Financial assistance costs</td>
<td>74%</td>
<td>26%</td>
<td>0%</td>
<td>0%</td>
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</table>

Tenant-based rental assistance (TBRA). In conjunction with affordable housing, many attendees mentioned the need to increase availability of the TBRA program and as a companion to the development of affordable housing. Of respondents to the survey, 63% believed there was a high need for this activity.

Nonprofit capacity building and operating assistance. In the survey, respondents were asked if they believed there was a need for nonprofit capacity building and operating assistance. Of respondents to the survey, 100% responded affirmatively that there was a need in the nonprofit sector for this assistance.

In their memorandum and their agency sponsored virtual session, the Los Angeles Homeless Services Authority (LAHSA) recommendations for the use of HOME-ARP funds within Los Angeles County. They advocated that a “balance of resources to within the homeless services system is critical to ensure effective operations” and recommend a ration of five permanent housing resources for every interim housing bed. That balance informs their recommendations:

1. Acquisition of permanent housing resources if other funds are available to leverage for the purchase of multi-unit buildings, scattered sites properties, or individual units.
2. Master leasing, which is not outlined in the HOME-ARP guidance but is being explored through conversations between LAHSA and HUD.
3. Supportive services that support emergency housing vouchers and services based in problem solving, prevention and diversion to prevent the need for interim housing or accessing the homeless services system.
Public Participation

To provide opportunities for public participation, the City of Palmdale sent an email to all agencies and individuals on its email list notifying them of the opportunity to participate in the virtual consultation session held on March 9, 2022. In addition to attending the virtual consultation session, they were asked to complete an online survey regarding their views of the level of need for the eligible activities and qualifying populations as described by the CPD Notice 21-10. Those unable to attend, or who had further comments after the virtual session were invited to email them directly to City staff.

A combined notice of public comment period and public hearing was published in the Antelope Valley Press on April 1, 2022. The Antelope Valley Press qualifies as a newspaper of general circulation.

Efforts to Broaden Public Participation

To broaden public participation, members of the public who are on the City’s email list were also invited via email to attend the virtual consultation session held in the formulation of the Allocation Plan.

Public Comments and Recommendations Received

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

Public Comments and Recommendations Not Accepted and Reasons Why

A summary of comments and recommendations received but not accepted and the reasons why will be included prior to the submission of this Allocation Plan to HUD.
Needs Assessment and Gap Analysis

The needs assessment and gap analysis must evaluate the size and demographic composition of HOME-ARP qualifying populations, and unmet needs of HOME-ARP qualifying populations. In addition, the needs assessment and gap analysis must identify any gaps within its current shelter and housing inventory, and service delivery system. This needs assessment and gap analysis focuses on the following:

1. Sheltered and unsheltered homeless populations;
2. Currently housed populations at risk of homelessness;
3. Other families requiring services or housing to prevent homelessness; and
4. Those at greatest risk of housing instability or unstable housing situations.

Housing Inventory Count

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing on any given night. The following tables summarize beds and units available as of January 2021 in the City by bed type.

Emergency housing beds include emergency shelter and transitional housing; emergency shelter generally allows for short-term or nightly stays, while transitional housing generally allows for a stay up to 24 months. Both types of emergency housing may include supportive services designed to facilitate movement to independent living.

The 2021 HIC did not include details about housing available for subpopulations.

<table>
<thead>
<tr>
<th>Table 4 – Emergency Housing Beds Available January 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Family Units</strong></td>
</tr>
<tr>
<td>Emergency Shelter</td>
</tr>
<tr>
<td>Transitional Housing</td>
</tr>
<tr>
<td><strong>Total Emergency Housing Beds</strong></td>
</tr>
</tbody>
</table>
Rapid rehousing provides security and utility deposits and/or monthly rental and utility assistance for rental units that rent for less than the fair market rent. Assistance is generally provided for the shortest period of time necessary for a household to gain stable housing and can range from 3 to 24 months. Permanent supportive housing provides for an unlimited lease term; residents receive services necessary to promote continued housing stability.

Table 5 – Rapid Rehousing and Permanent Supportive Housing Available January 2021

<table>
<thead>
<tr>
<th></th>
<th>Family Units</th>
<th>Family Beds</th>
<th>Adult-Only Beds</th>
<th>Child-Only Beds</th>
<th>Total Year-Round Beds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rapid Rehousing</td>
<td>172</td>
<td>79</td>
<td></td>
<td></td>
<td>251</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>1</td>
<td>28</td>
<td></td>
<td></td>
<td>29</td>
</tr>
<tr>
<td>Total Year-Round Beds</td>
<td>173</td>
<td>79</td>
<td>28</td>
<td></td>
<td>280</td>
</tr>
</tbody>
</table>

Size and Demographic Composition of Qualifying Populations

Due to the coronavirus pandemic, there was no street count conducted in 2021 to identify unsheltered homeless populations. The January 2020 point-in-time (PIT) count of both sheltered and unsheltered homelessness is used for this analysis.

Sheltered Homeless Populations

The 2020 sheltered point-in-time count identified 48 people experiencing sheltered homelessness in the City on January 22, 2020. People are considered sheltered when they are residing in emergency shelter or transitional housing, but not when they are receiving rapid rehousing assistance or residing in permanent supportive housing. Among individuals experiencing sheltered homelessness:

- 48 (100%) were in emergency housing

LAHSA does the official PIT count in Los Angeles County and does not publish demographics or family status.

Unsheltered Homeless Populations

The 2020 unsheltered point-in-time count identified 237 people experiencing unsheltered homelessness on January 22, 2020. Among individuals experiencing unsheltered homelessness:
- 47 (19.83%) were on the street  
- 33.6 (14.15%) were in tents  
- 68.7 (28.98%) were in makeshift shelters  
- 15.5 (6.54%) were in cars  
- 8.9 (3.76%) were in vans  
- 63.4 (26.73%) were in RVs/campers  

**At-risk of Homelessness**

Households at risk of homelessness are those with incomes at or below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and:

- Have moved more than two times due to economic reasons in the past 60 days, or  
- Are doubled up with another household due to economic hardship, or  
- Will be evicted within 21 days, or  
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or  
- Live in an efficiency apartment and are overcrowded, or  
- Are exiting a publicly-funded institution or system of care  

The CHAS 2014-2018 Data Table 10 indicates that there are approximately 5,575 households with incomes at or below 30% AMI that are at risk of homelessness in the City.

**Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking**

The State of California Department of Justice maintains statistics on domestic violence statewide by jurisdiction. In 2018, the Los Angeles County Sheriff’s Department responded to a total of 951 calls related to domestic violence. Of these calls:

- 97 of these domestic incidents did not involve a weapon  
- 854 calls involved a weapon  
  - 12 domestic incidents involved a firearm  
  - 21 domestic incidents involved a knife or cutting instruments  
  - 125 domestic incidents involved other dangerous weapons  
  - 696 domestic incidents involved personal weapons (i.e. feet or hands, etc.)

Therefore, if each one of these calls represented a household with member(s) who required housing assistance, it can be estimated that there were up to 951 households in 2018 who...
were in need of some form of housing assistance. The form of housing assistance required may vary depending on the specific circumstances of each case.

**Other Populations**

Other populations, as defined by HOME-ARP, include those who:

1. Are currently housed and at risk of repeat homelessness;
2. Have incomes at or below 30% AMI and are experiencing severe housing cost burden; and
3. Otherwise meet the definition of at risk of homelessness and have incomes income of more than 30% and at or below 50%

**Other Populations: At greatest risk of housing instability – Households with incomes <30% AMI and experiencing housing cost burden**

The 2014-2019 HUD CHAS data indicates there are 6,115 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability. These renter households include:

- Two-person households, one or both of who are age 62 or older: 150
- Small families with 2-4 non-elderly people: 155
- Large families with 5 or more people: 60
- People living alone or with non-relatives who are age 62 or older: 330
- People living alone or with non-relatives, none of whom are age 62 or older: 45

**Other Populations: At greatest risk of housing instability – Households with incomes 30-50% AMI that meet HUD’s §91.5 definition of at risk of homelessness**

Households in this category are those with incomes at more than 30% and at or below 50% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardship, or
- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
• Are exiting a publicly-funded institution or system of care

HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 Data Table 10 provides information on households that include more than one family, household income level and overcrowding. The CHAS data indicates that there are approximately 2,805 households with incomes between 30 and 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD. In addition, 22 are living in households with more than one family.

**Unmet Housing Needs of Qualifying Populations**

The greatest unmet housing need of qualifying populations is the availability of affordable rental housing. As the table below shows, only 12% of the more than 15,000 rental units in the City are available to households with incomes at or below 50% AMI. The level of need for affordable rental units for households with incomes at or below 50% AMI is more than four and a half times the available units, according to HUD CHAS data for 2014-2018.

<table>
<thead>
<tr>
<th>Total Rental Units</th>
<th>Available Units</th>
<th>Level of Need</th>
<th>HH with at least 1 Housing Problem</th>
<th>GAP (units-level of need)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Rental Units</td>
<td>15,865</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;=30% AMI</td>
<td>1,655</td>
<td>5,575</td>
<td>4,715</td>
<td>(3,920)</td>
</tr>
<tr>
<td>&gt;30% to &lt;=50% AMI</td>
<td>280</td>
<td>3,320</td>
<td>2,805</td>
<td>(3,040)</td>
</tr>
<tr>
<td>Total &lt;=50% AMI</td>
<td>1,935</td>
<td>8,895</td>
<td>7,520</td>
<td>(6,960)</td>
</tr>
</tbody>
</table>

**Unmet Service Needs of Qualifying Populations**

Based on consultation with service providers in the City, the greatest unmet service needs of qualifying populations included sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- Job training and employment services
- Housing search and housing counseling services
- Childcare assistance
- Mental health services
- Outreach services
- Case management services

Additional unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness,
other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations include the following as described in HUD CPD Notice 2021-10, as may be amended:

- Education services
- Food assistance
- Legal services
- Outpatient health services
- Substance abuse treatment
- Transportation assistance
- Mediation services
- Credit repair services
- Landlord/tenant liaison services
- Services for special populations
- Financial assistance costs

**Current Resources Available to Assist Qualifying Populations**

Current available resources include:

- Congregate beds and non-congregate shelter units;
- Supportive services;
- Tenant-based rental assistance; and
- Affordable and permanent supportive housing

**Current Resources: Congregate Beds and Non-congregate Shelter Units**

In January 2021, there were 48 congregate beds and 280 beds in non-congregate shelter units. Congregate beds include emergency, safe haven, and transitional housing beds and units. Non-congregate shelter includes permanent supportive housing and rapid re-housing.

**Current Resources: Supportive Services**

The lead agency on coordinated entry system (CES), Valley Oasis, considers 39 agencies providing a range of supportive services as referral partners and another 20 agencies as participating partners in the CES system. Although Valley Oasis serves communities other than Palmdale, most of the agencies also service an area larger than Palmdale. The range of services available in the network includes mental health services, domestic violence prevention, children’s services, jobs, food assistance, education services, veterans’ services, and housing services.
Current Resources: Tenant-based Rental Assistance

The City funds one agency using HOME funds to provide tenant-based rental assistance to 30 senior households with income at or below 30% AMI.

Current Resources: Affordable and Permanent Supportive Rental Housing

There are 21 apartment complexes within the City that have been identified as being affordable rental housing units. The City makes the contact information on these properties available to people and agencies assisting people seeking housing. The properties offer at least 1,838 affordable units. Of those properties, 2 properties are identified as permanent supportive housing (52 units) and 4 properties are project-based Housing Choice Voucher programs.

Shelter, Housing and Service Delivery System Gaps

Shelter Gap

There is an estimated need for 241 additional shelter beds based on the 2020 PIT count. The PIT count found that there were 48 persons in emergency shelter in the City but 241 unsheltered persons in a variety of situations, including on the street, in tents or makeshift shelters, or in cars, vans or RVs/campers.

The 2020 PIT count does not define, how many were individuals, in family units, or children

Tenant-based Rental Assistance Gap

There is an estimated gap of 4,984 tenant-based rental assistance vouchers for households with income less than 50% AMI and paying more than 50% of household income for rent, including utilities.

The number of tenant-based rental assistance vouchers was calculated using HUD CHAS data Table 7 and is equal to the number of renter households with income at or below 50% AMI and paying more than 50% of household income for rent, including utilities.

Table 7– Tenant-based Rental Assistance Gap

<table>
<thead>
<tr>
<th>Tenant-based Rental Assistance Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Renter Households with Income at or below 50% AMI paying more than 50% of income for rent, including utilities</td>
<td>5,014</td>
</tr>
<tr>
<td>TBRA vouchers available</td>
<td>30</td>
</tr>
<tr>
<td>TBRA gap</td>
<td>4,984</td>
</tr>
</tbody>
</table>
Affordable Supportive Rental Housing Gap

There is an estimated gap of 5,425 rental units affordable to renter households with income at or below 30% AMI and an estimated gap of 2,480 rental units affordable to renter households with income above 30% and up to 50% AMI.

The number of Affordable Rental Units was calculated using HUD CHAS Data Table 7 and is equal to the number of renter households’ income category paying more than 50% of household income for rent, including utilities.

<table>
<thead>
<tr>
<th>Affordable Rental Unit Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Renter Households with Income at or below 30% AMI paying more than 50% of income for rent, including utilities</td>
<td>5,425</td>
</tr>
<tr>
<td>Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent, including utilities</td>
<td>2,480</td>
</tr>
<tr>
<td><strong>Total Affordable Rental Unit Need</strong></td>
<td>7,905</td>
</tr>
</tbody>
</table>

Permanent Supportive Rental Housing Gap

Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income at or below 30% AMI. In addition to affordable rent, permanent supportive housing provides an array of services necessary to help people with disabilities and/or experiencing chronic homelessness to retain housing stability. There is an estimated gap of 451 permanent supportive housing units in the City.

The number of Permanent Supportive Rental Housing Units needed was calculated by multiplying the current population of the City, according to the California Census 2020, by the per capita need (.003182) in California as calculated by the Corporation for Supportive Housing.

<table>
<thead>
<tr>
<th>Permanent Supportive Housing Gap</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Population of Palmdale Census 2020</td>
<td>157,358</td>
</tr>
<tr>
<td>Per capita estimate of permanent supportive housing need</td>
<td>.003183</td>
</tr>
<tr>
<td>Estimated need for Permanent Supportive Housing</td>
<td>501</td>
</tr>
<tr>
<td>Permanent Supportive Housing Available</td>
<td>52</td>
</tr>
</tbody>
</table>
Service Delivery System Gaps

To identify gaps in the service delivery system, the City relied on its consultation with stakeholders and experience working with the organizations working in the City. The stakeholders believe that the most critical service gaps are in the areas of job training and employment services, housing search and housing counseling services, childcare, mental health services, outreach services, and case management. The stakeholders also believed there was a need for assistance with general administrative costs and building capacity among the service providers serving the City’s qualifying populations.

Characteristics of Housing Associated with Increased Risk of Homelessness for Other Populations

For other populations, severe housing cost burden, or paying more than 50% of household income for rent and utilities is the primary characteristic of housing associated with the risk of homelessness in the City. The HUD CHAS Data Table 7 indicates there are 7,905 household at or below 50% AMI who are spending more than 50% of the household income on rent and utilities.

Priority Needs for Qualifying Populations

Priority needs for qualifying populations are:

- Affordable rental housing
- Tenant-based rental assistance
- Non-congregate shelter
- Supportive services including:
  - job training and employment services
  - housing search and housing counseling services
  - childcare
  - mental health services
  - outreach services
  - case management
HOME-ARP Activities

The City will solicit applications from developers, service providers, and/or nonprofits to administer eligible activities and/or develop shelter and housing. A Notice of Funds Available (NOFA) will be issued. The NOFA will, at a minimum, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

Uses of HOME-ARP Funding

<table>
<thead>
<tr>
<th>Activity</th>
<th>Funding Amount</th>
<th>Percent of Allocation</th>
<th>Statutory Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-congregate Shelter</td>
<td>$1,779,932</td>
<td>85%</td>
<td></td>
</tr>
<tr>
<td>Affordable Rental Housing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tenant-based Rental Assistance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supportive Services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nonprofit Operating Assistance</td>
<td></td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Nonprofit Capacity Building</td>
<td></td>
<td>5%</td>
<td></td>
</tr>
<tr>
<td>Administration and Planning</td>
<td>$314,054</td>
<td>15%</td>
<td>15%</td>
</tr>
<tr>
<td>Total HOME-ARP Allocation</td>
<td>$2,093,986</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Rationale for Uses of HOME-ARP Funding

There is need for additional projects, programs and services in all the eligible activity areas and serving the qualifying populations as evidenced by the consultation process and the needs assessment and gap analysis undertaken in the preparation of this allocation plan.

The City currently funds a TBRA program serving 30 senior households with its annual allocation of HOME funds. While the need is great for affordable housing development, the City has already earmarked CDBG and HOME funds for future development projects to assist in addressing this need. There are a wide range of agencies in the City and regionally offering a range of supportive services to qualifying populations.

The City has determined that the highest and best use of this allocation, for the greatest impact in the lives of individuals and families, is to allocate the funds to a facility that has been considered in the City to house a navigation center and non-congregate shelter. The City has been assembling land for the facility and has informally discussed the structure to be built. With a navigation center on the ground floor (housing representatives of many of the
agencies offering supportive services) and two floors of non-congregate shelter (one floor for individuals and families without children and a second for families with children).

This allocation of HOME-ARP funds will be used for the construction of the portion of the facility providing non-congregate shelter. The City will leverage other funds for the navigation portion of the facility.
HOME-ARP Housing Production Goals

The City of Palmdale will produce approximately 25 units of non-congregate shelter with the HOME-ARP funding. The units will accommodate individuals, families without children, and families with children. The City has not determined the design or mix of the units but will leverage qualitative input and quantitative data to meet the needs of a changing population.

Preferences

The City of Palmdale will not provide preferences to any population or subpopulation.

HOME-ARP Refinancing Guidelines

The City of Palmdale does not plan to use HOME-ARP funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. Therefore, refinancing guidelines pursuant to 24 CFR 92.206(b) are not applicable to this HOME-ARP Allocation Plan.
APPENDIX A
Citizen Participation
Summary of Citizen Participation Comments

April 1 - May 4, 2022 Allocation Plan Public Review and Comment Period

Information to be added after close of public comment period.

Public Hearing before City Council on May 4, 2022

Information to be added after Public Hearing.
APPENDIX B
SF-424 Grant Applications,
SF-424D Assurances, and
Allocation Plan Certifications