

County Of Santa Barbara

Mona Miyasato
County Executive Officer



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Executive Office

September 13, 2016

Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-0500

To Whom It May Concern:

In response to a request for public comment that was published on July 25, 2016 in the Federal Register, the County submits the following comments in favor of the U. S. Department of Housing and Urban Development (HUD) adopting alternative Formula "A", which is one of four formula alternatives to the existing Preliminary Pro Rata Need (PPRN) formula which is used in the establishment of Continuum of Care funding allocations to CoC's nationally. The County serves as the Collaborative Applicant for the Santa Maria/Santa Barbara County CoC.

As HUD is aware, the Continuum of Care program provides federal funding to local communities to address and reduce the prevalence of homelessness. The Federal Register notice discussed four (4) options provided by HUD to revise the formula and requested input from local jurisdictions and other stakeholders on what impact a revised formula allocation would have on their community. The revised formula alternatives included several new factors, such as community's housing market, affordability, and community demographics which are known to be better correlated to the prevalence of homelessness in the community. The County supports formula factors which research demonstrates are more closely correlated with the prevalence of homelessness in the community. Santa Barbara County is one of the highest cost areas in California, which is generally a state with higher median priced housing. A key factor driving high rental costs is the low rental housing inventory. While any one of the four proposed formula scenarios would provide additional Continuum of Care resources to address and reduce homelessness in our community, the County would like to recommend HUD's consideration of Alternative Formula "A" which considers population, poverty, affordability gap, and rent-burdened extremely low income households (ELI), and the prevalence of renter-occupied housing units as a formula which most closely aligns those factors more highly correlated with community homelessness.

The Santa Barbara County Board of Supervisors considered, and approved the submission of this letter of support for Alternative Formula "A" at their September 13, 2016 meeting. Additional comments or questions on the County's position can be directed to George Chapjian, Community Services Director at (805) 568-2485.

Sincerely,

Mona Miyasato
County Executive Officer

cc: George Chapjian, Community Services Director

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