



**BOARD OF SUPERVISORS
AGENDA LETTER**

Agenda Number:

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

Department Name: Community Services
Department No.: 057
For Agenda Of: May 7, 2024
Placement: Departmental
Estimated Time: 30 minutes
Continued Item: No
If Yes, date from: N/A
Vote Required: Majority

TO: Board of Supervisors
FROM: Department Jesús Armas, Community Services Director (805) 568-2467
Director:

Contact Info: Joe Dzvonik, Deputy Director, Housing and Community
Development Division (805) 568-3523
Lucille Boss, Interim Housing and Programs Manager (805)
568-3533
**SUBJECT: Approval of Santa Barbara County HOME Consortium and CDBG Urban
County FY 2024 Annual Action Plan and FY 2021, FY 2022, and FY 2023 Annual
Action Plan Substantial Amendments**

County Counsel Concurrence

As to form: Yes

Risk Management

As to form: Yes

Recommended Actions:

That the Board of Supervisors (Board):

- a) Receive and file a staff report on the Santa Barbara County 2024-25 Annual Action Plan (FY 2024 Action Plan) (Attachment A), which includes recommendations for awards of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds for FY 2024-25;
- b) Receive and file a staff report on the FY 2021, FY 2022, and FY 2023 Santa Barbara County Annual Action Plan Substantial Amendments (Substantial Amendments) (Attachment B), which includes recommendations for awards of prior-year CDBG funds for use on projects in FY 2024-25;
- c) Consider public comments received on the draft FY 2024 Action Plan and Substantial Amendments during the thirty (30) day public comment period, which commenced on April 5, 2024, and concludes at today's public hearing on this item;

Auditor-Controller Concurrence

As to form: Yes

- d) Approve funding awards as recommended and direct staff to include the awards in the FY 2024 Action Plan and Substantial Amendments;
- e) Approve the Contingency Plans for CDBG funding awards as outlined herein, if the actual FY 2024 HUD allocation is more or less than the amount estimated;
- f) Adopt a Resolution authorizing submittal of the FY 2024 Action Plan and Substantial Amendments to the U.S. Department of Housing and Urban Development (HUD) (Attachment C);
- g) Direct staff to finalize the FY 2024 Action Plan and Substantial Amendments, add any public comments received, and submit the FY 2024 Action Plan and Substantial Amendments to HUD;
- h) Authorize the County Executive Officer or her designee to execute all certifications, standard forms, and other related documents required for the acceptance and administration of FY 2024 CDBG and HOME funds, and authorize the County Executive Officer or her designee to execute all certifications, standard forms, and other related documents required for the submittal to and approval by HUD of the FY 2024 Action Plan; and
- i) Determine that the above recommended actions are not the approval of a project that is subject to environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15378(b)(4), finding that the project is a creation of government funding mechanisms or other government fiscal activities, which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment.

Summary Text:

HUD FY 2024 Action Plan

Each fiscal year, the County is required to submit an annual action plan to the U.S. Department of Housing and Urban Development (HUD) reflecting the annual allocation, grant awards made to qualifying nonprofit organizations operating in Santa Barbara County, and County management and oversight of CDBG and HOME entitlement funds. The Action Plan represents the County's formal annual grant application to HUD for HOME and CDBG allocations. The estimated CDBG and HOME allocations for FY 2024 (pending HUD confirmation) are as follows:

Community Development Block Grant (CDBG):	\$1,224,523
HOME Investment Partnerships Program (HOME):	\$1,297,229

In addition, the County is required to submit to HUD an Action Plan Substantial Amendment when prior-year funds are used for a project or program not previously included in that year's Action Plan.

CDBG Overview:

CDBG funds are allocated for eligible capital, infrastructure, or economic development activities. The County's Housing and Community Development Division (HCD) received 22 applications for CDBG Public Services funds representing \$638,450 in requests, with an estimated \$183,678 available to allocate. Six (6) applications were received for capital projects, totaling \$6,518,785 in requests, with an estimated \$1,280,434 available to allocate (see Table 1 discussion).

HOME Overview:

HOME funds are primarily used for affordable housing construction and rehabilitation and Tenant-Based Rental Assistance (TBRA). The Notice of Funding Availability (NOFA) solicited Notices of Intent (NOI) for developments that would be ready to proceed in FY 2024, and HCD received ten (10) NOIs. Additionally, the cities of Santa Maria and Lompoc reserved part or all of their pro-rata share of HOME funding for implementation of TBRA programs. Full housing project applications are requested from developers as development projects are ready to move forward. HCD staff subsequently returns to the Board as proposed development projects are prepared to apply for final project financing or are otherwise ready to proceed.

Background:

In partnership with local participating jurisdictions, County HCD serves as lead entity for the CDBG Urban County Partnership and HOME Consortium. The CDBG Urban County Partnership consists of the County and the cities of Buellton, Carpinteria, and Solvang. The HOME Consortium includes these cities as well as the cities of Goleta, Lompoc, and Santa Maria. Each year, as lead agency, the County receives an allocation of CDBG and HOME funds from HUD on behalf of the Urban County Partnership and HOME Consortium.

As of the date that this Board Letter was docketed, HUD has not announced the County’s actual FY 2024 allocations. As permitted by HUD, and to ensure timely submission of the FY 2024 Action Plan, this Board Letter includes estimated allocations and a contingency plan describing how project funding will be adjusted to reflect actual allocation amounts.

CDBG Program

The CDBG program is utilized primarily for capital projects and public services programs, with a cap of fifteen percent (15%) of the annual allocation which may be allotted to public services. The County retains twenty percent (20%) of the annual CDBG entitlement allocation for program administration.

Estimated FY 2024 CDBG funding and distributions are in Table 1 below.

Table 1: Estimated Distributions to CDBG Urban County Partner Cities, FY 2024

Jurisdiction	Distribution	20% Admin	15% Public Services	65% Capital Projects	Total CDBG Funds
County		\$244,904			\$244,904
County	85.31%		\$156,698	\$679,030	\$835,728
Buellton	3.18%		\$5,841	\$25,312	\$31,153
Carpinteria	8.11%		\$14,890	\$64,522	\$79,412
Solvang	3.40%		\$6,249	\$27,077	\$33,326
Total	100%	\$244,904	\$183,678	\$795,941	\$1,224,523

CDBG Urban County member cities may fund qualifying projects in their respective communities with their CDBG sub-allocations. Alternatively, they may pool their funds with the County if no projects or programs are proposed in their cities during the forthcoming Action Plan fiscal year. Priority is given to

projects that are ready to proceed with all resources identified to ensure timely implementation and completion. This ensures that the County meets CDBG timely expenditure deadlines and avoids potential HUD recapture of funds. Any unallocated CDBG funds and program income (loan repayments) are added to the following year’s NOFA to be made available to Capital projects. Under the current cycle, unallocated funds and program income increase Capital funds available by \$484,493, for an estimated total of \$1,280,434 (\$795,941 + \$484,493).

For FY 2024, the City of Carpinteria chose to utilize its sub-allocation of CDBG for public services programs and review applications through the City’s process, including final funding approval by its City Council. Carpinteria also applied via the NOFA for the Franklin Creek Trail Improvements CDBG Capital project, to which its pro-rata share of capital funds for the last three years is being applied, as outlined in the Urban County Partnership Agreement. As the other CDBG Urban County participating cities did not recommend programs or projects for funding with their pro rata allocations, these allocations were added to the County’s funding pool for allocation through the County NOFA process to eligible projects and programs.

HOME Program

The HOME program is utilized primarily for affordable housing development but also allows for Tenant-Based Rental Assistance (TBRA), homebuyer assistance, and other eligible activities. The County retains ten percent (10%) of the annual HOME entitlement allocation for program administration.

Estimated FY 2024 HOME funding and distribution to each member city is in Table 2 below.

Table 2: Estimated Distributions to HOME Consortium Member Cities and Required Community Housing Development Organization (CHDO) set-aside

Jurisdiction	Distribution	Admin 10%	FY 24 Pro Rata Share for Projects	FY 24 Total Funds Available
County		\$129,723		\$129,723
County	40.45%		\$393,562	\$393,562
Buellton	1.43%		\$13,954	\$13,954
Carpinteria	3.86%		\$37,522	\$37,522
Goleta	9.18%		\$89,329	\$89,329
Santa Maria	30.78%		\$299,499	\$299,499
Solvang	1.55%		\$15,123	\$15,123
Lompoc	12.74%		\$123,933	\$123,933
CHDO*	15%		\$194,584	\$194,584
Total	100.00%	\$129,723	\$1,167,506	\$1,297,229

*A CHDO (Community Housing Development Organization) is a private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. HUD requires that 15% of HOME funds be set aside for use by CHDOs which act as the owner, developer, or sponsor of an eligible set-aside activity. Currently, People’s Self-Help Housing Corporation is the only HUD-designated CHDO operating in Santa Barbara County.

The Cities of Lompoc and Santa Maria have advised the County on the use of their respective HOME sub-allocations. The other cities have pooled their funds with the County's to be allocated via the NOFA process. For FY 2024, the City of Santa Maria will utilize \$150,000 in HOME funds for continued implementation of a Tenant-Based Rental Assistance Program utilized for security deposits, with the remaining balance to be utilized for a future affordable housing development project. The City of Lompoc will use its sub-allocation of HOME funds, estimated to be \$123,933, for a Tenant-Based Rental Assistance Program to be administered by the County Housing Authority.

Unallocated prior-year HOME funds and HOME program income (loan repayments) are pooled with FY 2024 funds in the NOFA process. Under the NOFA, \$1,940,742 in prior-year HOME funds and \$1,068,119 in HOME program income are available for projects.

In addition to HOME funds, two non-HUD funding sources are included in the NOFA under Housing Development. The County is the lead agency of the State Permanent Local Housing Allocation (PLHA) consortium, which also includes the cities of Buellton, Carpinteria, Goleta, Santa Maria, and Solvang. At present, a balance of \$315,552 in PLHA funds is available for housing development programs. The County's In-Lieu Fee program also provides funds for housing development, of which \$1,101,936 are currently available. A Housing Development project recommended under the NOFA may be funded with any combination of HOME, PLHA, and In-Lieu funds.

Action Plan Overview

The FY 2024 Action Plan represents the fifth and final operating year of the 2020-2025 Five Year Consolidated Plan, which articulates overall unmet needs, goals, priorities, objectives, and performance measures under CDBG and HOME. The Consolidated Plan and Action Plan serve as strategic planning documents for programs, projects, and services to address Santa Barbara County's low-income residents' needs utilizing these federal entitlement funds. The Action Plan represents the County's formal grant application to HUD for CDBG and HOME entitlement funds.

Public Comment Period: The draft FY 2024 Action Plan and Substantial Amendments were made available for review by the public during a 30-day public comment period, which commenced on April 5, 2024, and concludes at the end of today's public hearing. Any public comments received by HCD were forwarded to the Board of Supervisors for consideration prior to today's hearing. Public comments and any responses by the County will be included in the draft Action Plan as it is finalized. The Action Plan will be revised to incorporate any Board direction. Staff will subsequently submit the final Action Plan to HUD by the May 15, 2024 deadline.

FY 2024 Notice of Funding Availability (NOFA) Process

County HCD issued the FY 2024 NOFA on November 15, 2023. Applications for CDBG funds were due on January 12, 2024. CDBG Public Services applications were vetted for initial threshold eligibility by HCD and forwarded to the Human Services Commission's Allocations Committee for review, scoring, and funding recommendations. County HCD staff reviewed applications for CDBG Capital projects and forwarded its recommendations to the Capital Loan Committee for concurrence of staff recommendations or other recommendations. The funding recommendations from both committees are included in this Board Letter.

NOIs for housing development funds, including HOME, State PLHA, and local In-Lieu, were due on November 30, 2023. For housing projects that appeared ready to move forward in the current calendar year, HCD requested full applications. As projects are ready to receive a commitment of County funds, staff convenes the Capital Loan Committee for funding recommendations and will return to the Board for formal funding reservations or approval of funding awards and execution of loan documents. For projects that include HOME funds, an Action Plan Substantial Amendment will also be submitted for approval. No projects are being added to the Action Plan at this time.

Application Review/Advisory Committees

The Human Services Commission (HSC) is a Brown Act committee created to have three (3) representatives from each Supervisorial District appointed by the respective Board member for a total of fifteen (15) members. The HSC Allocations Committee is currently comprised of four Commissioners, with the HSC chair serving as a non-voting, ex-officio member. The Allocations Committee reviews and scores CDBG Public Services applications and makes funding recommendations for consideration by the Board. Every third year, the Allocations Committee also considers funding recommendations for general fund grants in the amount of \$990,000 per inclusion of these funds in the annual budget approved by the Board. Of this amount, \$30,000 is set aside to support the 2-1-1 program. FY 2024 is the third and final year of the three-year cycle and HCD staff will bring funding recommendations to your Board in 2025.

The Capital Loan Committee (CLC) is a Brown Act committee comprised of five (5) voting members and two (2) alternate voting members, in addition to three (3) non-voting advisory members, who may provide assistance during the meeting with technical questions that arise concerning projects' regulatory and financial detail. The CLC includes representation from North and South County financial/lending institutions, Public Housing Authorities, the County Auditor-Controller and Treasurer-Tax Collector's offices, as well as subject matter experts in the field of housing and community development and/or finance. HCD appoints members from each sector to the CLC. The CLC advises on housing and capital projects and makes funding recommendations for consideration by the Board.

CDBG Applications - Public Services

HCD received twenty-two (22) public services program applications representing \$638,450 in requests; this includes Santa Barbara County and two (2) Carpinteria applications. Carpinteria's applications were provided to city staff for their internal review and allocation process. The Carpinteria City Council approved two projects for funding at its March 11, 2024 council meeting. Subsequent to threshold eligibility review, County applications were provided to the Human Services Commission's Allocations Committee for consideration and determination of funding recommendations.

The Allocations Committee met on March 7, 2024 to hear applicants' presentations on their program proposals and to determine funding recommendations. The Allocation Committee's 2024 CDBG public services program funding recommendations for consideration and approval by the Board are listed in Table 3 below. A summary list of all 2024 CDBG public services applications, including those not recommended for funding, is included as Attachment D to this staff report.

Table 3: Santa Barbara County CDBG Public Services Funding Recommendations

Applicant	Program	Service Area	Funding Recommendation (*to be revised under contingency plan)
Channel Islands YMCA	Noah’s Anchorage Youth Crisis Shelter	Countywide	\$17,000
Girls Inc. of Carpinteria	Out-of-School Programs	Carpinteria	\$7,445*
Good Samaritan Shelter	Freedom Warming Centers	Countywide	\$22,000*
Good Samaritan Shelter	BridgeHouse Shelter	Mid County	\$17,000
Legal Aid Foundation of Santa Barbara County	Family Violence Prevention Program	Countywide	\$22,000*
New Beginnings (NBCC)	Safe Parking Shelter and Rapid Rehousing Program	Countywide	\$17,000
Partners in Housing Solutions, Inc.	Partners in Housing Solutions	Countywide	\$17,000
People’s Self-Help Housing	Camino Scholars Carpinteria	Carpinteria	\$7,445*
Santa Maria Valley Meals on Wheels	Meals on Wheels	North County	\$17,000
St. Vincent’s Institution	Family Strengthening Program	South County	\$17,000
Santa Ynez Valley Community Outreach	Senior Food Program	Mid County	\$22,000*
TOTAL:			\$182,890

Contingency Plan: In the event that actual funds available are higher or lower than estimated, the following contingency plan will be implemented:

- Per the City of Carpinteria, evenly divide any increase or decrease in Carpinteria’s pro-rata share of Public Services funding between Girls Inc. of Carpinteria Out-of-School Programs and People’s Self-Help Housing Camino Scholars Carpinteria.
- Per the Allocations Committee, evenly divide any increase or decrease in the balance of Public Services funding between Good Samaritan Shelter Freedom Warming Center, Legal Aid Foundation of Santa Barbara County Family Violence Prevention Program, and Santa Ynez Valley Community Outreach Senior Food Program.

CDBG Applications - Capital and Other Projects

The County received five (5) capital project applications and one (1) economic development program application, representing \$6,518,785 in requests, with an estimated \$1,280,434 available to allocate. HCD staff reviewed the applications considering the following criteria:

1. Project Readiness to Proceed and Timeline
2. Project Budget
3. Amount of Request / Percent of CDBG Funds to Total Project Budget
4. Level of Environmental Review Required
5. Population to be Served
6. Community Need
7. Staff Capacity and Experience in Capital Project Management
8. Applicant Financial Capacity

The Capital Loan Committee was convened on March 11, 2024, at which time the CLC made funding recommendations for Board consideration and final approval.

Table 4 below shows staff and CLC recommendations. A brief description of each project is included as Attachment E to this staff report.

Table 4: CDBG Capital and Other Project Recommendations

Organization	Project	Project Area	Funding Request	Funding Recommendation*
City of Carpinteria	Franklin Creek Trail Improvements	Carpinteria	\$844,785	\$570,000
CommUnify	Brisa Encina Head Start	Mission Hills	\$360,000	\$360,000
Fighting Back Santa Maria Valley	Navigation Center Acquisition	Santa Maria	\$599,000	\$299,000
People’s Self-Help Housing Corporation	Heritage View Apartments	Santa Maria	\$4,000,000	\$0
The Turner Foundation	Village Apartments Renovations	Santa Barbara	\$315,000	\$0
WeeCare DBA Upwards	BOOST Program	Countywide	\$400,000	\$0
Total Funding Available				\$1,280,434
Total Project Recommended Amounts				\$1,229,000
Balance				\$51,434

*Funding for the Fighting Back SMV Navigation Center Acquisition project (\$299,000) and a portion of the funding for the Carpinteria Franklin Creek Trail Improvements project (\$186,739) will be included in the FY 2021, FY 2022, and FY 2023 Substantial Amendments. The recommended award for the Franklin Creek Trail Improvements project includes Carpinteria’s pro-rata share of CDBG Capital funding.

Contingency Plan: If the actual allocation of CDBG funding is less than estimated by an amount exceeding the balance of uncommitted funds, funds will be reduced from the Franklin Creek Trail Improvements project if necessary.

Housing Development Applications

In response to the NOFA, HCD received ten (10) Notices of Intent to Apply (NOIs) for housing projects requesting County funding in the aggregate amount of \$18,054,340, with \$5,319,922 available.

At a Capital Loan Committee meeting held on March 11, 2024, the Committee recommended three (3) projects for funding, totaling \$3,957,850. Project-specific amounts are listed in Table 5 below. A full list of NOIs received is included as Attachment F to this staff report. These projects will be presented to the Board for final funding approvals at such time as they are ready to move forward. In the event that these projects do not move forward this calendar year, the developers will need to resubmit a NOI in the next funding cycle.

Table 5: Housing Development Project Recommendations

Developer/ Project Title	Number of Units/ Population/ Occupants/	Amount Requested	HCD/CLC Rec.	Funding Source	Project Location
Housing Authority of the County of Santa Barbara - <i>Hollister Lofts</i>	49 units Families Veterans, Homeless, At-risk of Homelessness	\$2,500,000	\$2,057,850	HOME	Unincorporated South County, area of Goleta
Santa Barbara County Housing Trust Fund - <i>3D Printed Home</i>	One 3-bd, Single Family Residence Low-income Household	\$250,000	\$400,000*	HOME and PLHA	City of Goleta
Cabrillo Economic Development Corporation - <i>Brisa Encina</i>	49 Units/ Veterans, Special Needs, Families, Homeless, At-risk of Homelessness	\$1,893,000	\$1,500,000	HOME	Unincorporated North County, near Lompoc
Total:			\$3,957,850		

*During project review, the applicant requested an increase to the requested amount due to the loss of a State funding resource.

Of the \$1,362,072 not recommended for projects, \$194,584 in HOME CHDO funds and \$65,552 in PLHA funds are subject to programmatic or geographical restrictions which make them unsuitable for allocation to projects proposed under the NOFA and expected to meet readiness thresholds during calendar year 2024. The remaining \$1,101,936 is the balance of In-Lieu funds, which are flexible funds being held in reserve for projects or contingencies that may arise outside of the NOFA cycle and need new and/or additional funds.

Once all necessary funding to complete the project is acquired by the developers, staff will return to the Board for either approval of a formal reservation of funds for submittal with tax credit applications, or to approve and execute County loan documents, as applicable. When HOME funds are included, the Board action will also include approval of an Action Plan Substantial Amendment to include the project(s).

Performance Measure:

HCD staff monitors the performance of all awardees. Public services program subrecipients are required to report to HCD on a quarterly basis. Subrecipients must also provide documentation supporting expenditures of funds and confirm cost-eligibility of expenses for which they expect to be reimbursed with federal, State, or County funds. For CDBG capital projects, HCD staff monitors construction progress to ensure the project is in line with the scope of work, schedule, and budget. Funds are allocated on a cost-reimbursement basis with associated documentation confirming cost-eligibility and compliance with funding regulations. Staff conducts annual monitoring of facilities improved with CDBG funds for a five-year minimum use period and housing projects per the term of the County’s

Regulatory Agreement. Housing developed with HOME, PLHA, and/or County in-lieu funds may enter into a loan agreement with the County, subject to future Board approval.

Fiscal and Facilities Impacts:

None at this time. Estimated grant funds for CDBG and HOME are included in the Recommended 2024-25 budget. As project contracts are brought to the Board for approval and execution, a fiscal impact will be realized at that time.

Key Contract Risks:

No project contracts being executed at this time.

Staffing Impacts:

HCD staff will administer the federal programs with the support of County Counsel and other County departments including the CEO, Auditor-Controller, Risk, and Community Services.

Special Instructions:

Please return a copy of the Minute Order and signed Resolution (Attachment C) to James Francis at jfrancis@countyofsb.org, ext. 83549.

Attachments:

- A: Draft FY 2024 Action Plan
- B: Draft FY 2021, FY 2022, and FY 2023 Substantial Amendments
- C: Authorizing Resolution
- D: List of CDBG Public Services Applications Received
- E: List of CDBG Capital Applications Received
- F: List of Housing Development Notices of Intent to Apply Received

Authored by:

James Francis, Senior Housing Programs Specialist