

Collier County, FL

HOME-American Rescue Plan
Allocation Plan



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[Table of Contents](#)

<i>Introduction</i>	<i>3</i>
<i>Consultation</i>	<i>3</i>
<i>Public Participation.....</i>	<i>10</i>
<i>Needs Assessment and Gaps Analysis.....</i>	<i>11</i>
<i>HOME-ARP Activities</i>	<i>18</i>
<i>HOME-ARP Production Housing Goals</i>	<i>19</i>
<i>Preferences</i>	<i>20</i>
<i>HOME-ARP Refinancing Guidelines</i>	<i>20</i>
<i>HOME-ARP Supporting Documentation.....</i>	<i>21</i>

HOME-ARP Allocation Plan

Participating Jurisdiction: Collier County, Florida

Date: 2/14/2023

Introduction

In September 2021, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$2,729,078 to Collier County, Florida for a new grant called the HOME Investment Partnerships Grant American Rescue Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must primarily assist people in HOME-ARP "qualifying populations" (QPs), which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness and those at greatest risk of housing instability or in unstable housing situations

To receive funding, the County must develop a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. This Plan will be submitted and approved by HUD. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and public engagement. The following is the County's HOME-ARP Allocation Plan.

Consultation

Summarize the consultation process:

Collier County's consultation process primarily consisted of the dissemination and feedback received via an online survey and one-on-one discussions. The online stakeholder survey was developed and disseminated in order to capture broad assessments of the community needs and areas for ARP allocation, as well as capturing stakeholders' direct observational insights and assessments of the unmet needs of QPs. The online survey was open from June 20, 2022 through August 15, 2022. The survey included seven ARP program-specific questions and one open-ended comment for community needs assessment. The survey received 14 respondents, including those representing homeless services providers, Fair Housing agencies, affordable housing developers,

domestic violence advocacy groups, and others. The Continuum of Care (CoC) and three other homeless service providers were consulted with via direct interviews.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Hunger & Homeless Coalition of Collier County	CoC Lead	Interview	Rental housing development would be the best use of HOME-ARP funds. There is no affordable rental inventory, and the County is not currently addressing the issue. There are several hotel properties that would be good options for conversion to rental housing. The County is also in need of low barrier shelter, specifically for chronically homeless and disabled individuals. St Matthews has a great program, but it does not meet the needs of this population. The County does not have a true low-barrier, Housing First emergency shelter. More accessible mental health services are needed. The County has a great mental health provider, but individuals experiencing homelessness do not have access to services. The county needs a walk-in mental health clinic. The Tenant Based Rental Assistance (TBRA) program that currently exists with HOME funds does not provide assistance to homeless households quickly enough. The Section 8 waitlist currently is seven years long and the Housing Authority isn't expanding.
Collier County Housing Authority	Housing Authority	Survey	The County has a lack of affordable housing and high rental rates and needs to increase inventory of housing units for low-income populations. Acquisition and rehab are the best uses of HOME-ARP funds for rental housing development.
David Lawrence Centers for Behavioral Health	Continuum of Care Staff/ Member, Homeless Service Provider, Organization Serving People with Disabilities, Veterans' Group,	Survey	The biggest gaps are low barrier homeless shelters and affordable housing for all. We also need more outreach and prevention services, mental health and addiction services and supports, supportive transitional and permanent housing apartments, group homes, housing for Veterans and seniors, etc. Collier needs more supportive housing, meaning we need affordable housing stock increased WITH supportive services to assist those in the housing to be successful (in the way of case

	Behavioral Health Service Provider		management, mental health counseling, addiction counseling, etc.). Needs of those struggling with mental health and addiction challenges who are homeless or at risk of homelessness has been further exacerbated by the psychological toll of the pandemic. Cost of rentals are not affordable, and many residents are leaving the area. Plans for these funds need to be coordinated with and aligned with the strategic goals of the local Continuum of Care and other workgroups/focus groups that have been working to address this issue.
Collier County - Bayshore/Gateway Triangle - Naples, FL	Local Government Agency; Fair Housing	Survey	Shelters and housing inventory are not complete. There is a need to form a subcommittee to keep a better track of the inventory as well as working with NABOR to provide accurate information with a software system to add or remove properties. Homeless prevention by education and programs to assist with self-sufficiency classes and monthly budgeting classes being offered with some sort of computer training for work is needed. Without the assistance to teach how to look for jobs and be self-reliant people do not know how to be motivated to search and do the work. Ensuring the population in need, work for the services will bring up their confidence, making them self-accountable and reliable. Providing them with the tools to be self-sufficient through education will help get them the help they need.
St Matthews House	Homeless Service Provider	Interview	Collier County has been experiencing an affordable housing crisis since Hurricane Irma in 2017. Rents have been increasing and new rental developments are not affordable to the qualifying populations. A growing subset of the homeless population is persons with disabilities and seniors. Often [Assisted Living Facility] ALF beds are not available for these individuals, and they are not the right fit for the shelter programs. Housing specifically for persons with mental health disorders is also a high need. Affordable rental housing development would be the best use of funds for the County. Conversion of nonresidential building to housing seems like it would be the most efficient, but there is a lack of buildings to convert. The areas where affordable housing development has

			been discussed in the past are not close to supportive services and transportation would become an issue.
Immokalee Fair Housing Alliance, Inc	Low-income Affordable Housing	Survey	The County needs to provide grants and loans for development of low-income rental housing for families with children born in US even if their parents are not citizens or legal residents. Affordable housing is the missing link to help low-income families escape from exploitation and poverty.
20th Judicial Circuit	Legal; Civil Rights	Survey	We need A LOT of affordable and safe rental units. There are a lot of jobs and opportunities here, but they don't pay enough for people to take those jobs and live locally. I think we should convert commercial property to higher density housing and/or mixed use, so that affordable units could be closer to the jobs and public transportation hubs. We need to utilize some of the struggling strip-mall locations to revitalize them as mixed use, affordable housing, which could include non-congregate shelter housing. It has pained me to see rental assistance come through, only to have landlords evict or non-renew a month or two later. I'm grateful for funds that buy the tenant a bit of time, but it's ultimately wasted money, as there is no return on investment beyond that immediate month. The tenant will still be displaced and has no longer-term solution for having enjoyed the benefit of that rental assistance. We have to use band-aids to stop bleeding, but it's frustrating that there's no lasting benefit from that aid. Nothing is improved by it.
Home Base Florida Veteran and Family Care	Veteran's Group	Survey	Non-profits often provide agility, flexibility and subject matter expertise to respond to issues like these in ways government often can't. Increasing support through public-private partnerships with reporting requirements and grant applications that aren't administratively burdensome are the key to making impactful, long-term impacts within our community. I believe that organizations like Wounded Warriors of Collier County, St Matthews and David Lawrence deserve the lion's share of the HOME-ARP funds as they are the community leaders making the difference in the lives of

			<p>individuals every day. Their ability to address homelessness is largely driven by financial resources or lack of. Government housing is something no government in the world. Subjective Units of Distress Scale (SUDs) and Mental Health go hand in hand with homelessness. Improving access to quality behavioral health should be integral to addressing homelessness.</p>
Community Assisted & Supported Living	Homeless Service Provider, Organization Serving People with Disabilities	Interview	<p>Rental housing development is the largest need. Affordable housing stock is the main problem. Our new developments are filled with 100 households in less than 50 days and quickly reach a 2-4 year waiting list. Non-congregate shelter is needed, but shelter is only temporary and finding permanent affordable housing is still an issue. TBRA is not beneficial because tenants are having issues finding units to rent. Supportive services such as mental health treatment, substance abuse treatment, and medical services are also needed, but these services cannot be successful if the person does not have stable housing. Permanent supportive housing and the housing first model are successful. New construction of housing is a better use of funds as opposed to rehab, because it is more sustainable, and the building will last longer. Deals are more difficult now than ever due to rising costs. HOME-ARP should be leveraged with other funding sources, such as SHIP.</p>
Collier County Sheriff's Office	Mental Health and Substance Use	Survey	<p>The biggest gap is inadequate amount of affordable (less than \$2000/month) rental houses and apartments. Rental properties that will accept vouchers, etc. for housing are nearly nonexistent. The county needs to support the construction of affordable housing through policy development, and push builders to comply. Collier's supportive services don't have an adequate inventory of affordable housing opportunities to refer clients to. Collier needs more non-congregate housing particularly for Veterans.</p>
Habitat for Humanity of Collier County	Fair Housing Organization	Survey	<p>Inventory of affordable homes for purchase (primary method of stabilizing workforce), and inventory of affordable rental units (with long</p>

			term affordability periods). Affordable rental housing development is the most significant area of need. HOME funds should be deployed to purchase land and assist in construction costs to ensure affordability in this high cost market.
ABLE Academy	Organization Serving People with Disabilities	Survey	The cost of housing, medical services, and therapy services keep rising in our area. Wages for many of the families we serve do not. Our families are in a really hard spot. Especially coming off of COVID, where many families lost income.
Collier County Probation	Misdemeanor Supervision	Survey	I see a lack of affordable housing for workers. In an attempt to elevate our community's status, we have ignored housing needs of our vital service workforce, much to our detriment. Acquisition/construction/rehab of affordable properties will enhance community while reducing traffic of would-be commuters.
Collier County Child Advocacy Council, Inc.	Victims of Child Abuse, Sexual Abuse	Survey	There's not enough shelter or affordable housing inventory. Need to develop more affordable housing, and rental units. Also need more case management, specific to helping individuals obtaining housing, help with budgeting, and childcare.
The Shelter for Abused Women & Children	Domestic Violence Service Provider / Homeless Service Provider	Survey	Emergency Shelter for survivors is addressed in this community by The Shelter. Funding for additional transitional housing units and funding to maintain those units are needed. Permanent housing units are needed for survivors when they exit emergency shelter or graduate from The Shelter's Transitional Housing Program. Funds are needed for the staff that address the immediate needs of survivors via emergency shelters. These staff members could help survivors attain housing. Additionally, funding to help support the operations of The Shelter's safe havens would be a useful way to address the needs of survivors in Collier County. More affordable rental housing units are needed, and these units need to be designated for victims of domestic violence and human trafficking. Funding could be used for acquiring units.
County Emergency Management	Disaster- All-hazards concerns	Survey	Unmet need: Absence of sufficient homeless day-shelter resources for health, hygiene, counseling and severe weather refuge. High priority should be given to homeless families or

			those with fragile health conditions. Look at the "tiny-house" as a possible resource where these micro-home parks- have been successfully operated.
Wounded Warriors of Collier County, Inc	Veterans' Group / Homeless Service Provider	Survey	<p>Gaps: 1. Low Demand housing - Homeless that St Matthews will not house.</p> <p>2. Funds available for immediate emergency housing</p> <p>3. No HUD/VASH vouchers in Collier County</p> <p>4. Lack of priority by Collier County to provide housing for homeless. Temporary shelters.</p> <p>TBRA: Make funding available to agencies & charities who have direct contact with the individual. Use agencies in Collier County - not Lee and SWFL organizations. For affordable housing, Rehabilitation & acquisition - building takes to long. Cut the red tape with zoning and permitting. Waive fees and processing time.</p> <p>Many seniors are not equipped and experience to use PC and the internet for information and filling out applications. Many are in need for wrap around services. Housing is just the 1st step. 90% of homeless have some level of mental health issues. Some don't won't housing but need services that can be provided by low demand housing, i.e, one or two nights.</p>
Youth Haven	Homeless Service Provider	Interview	<p>Youth Haven has a teen transitional housing program, Rob's Cottage, for youth aged 16-20. There is a lack of affordable housing for youth to transition to when they age out of the program. It can take six months for them to find housing. Many youth are in need of rental assistance as they transition, but they do not qualify for many of the federal rental assistance programs. The need for mental health services is growing, especially with youth. Families can not find access to timely mental health care. There are many job openings in the city, but people can not afford to live in the communities where they work. Geographically accessible affordable housing is needed. The HOME-ARP allocation is not a lot of money to work with, but all eligible activities are needed. As long as the funding is spent quickly, any use will benefit the County.</p>

Public Participation

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Notice of 1st public hearing published in Naples Daily News on 07/21/2022***
- ***Public hearing: 8/8/2022***
- ***Notice of public hearing published in Naples Daily News on 01/26/2023***
- ***Public comment period: start date 1/26/2023 end date 02/10/2023***
- ***Public hearing: 2/9/2023***

Describe any efforts to broaden public participation:

The 2023 Substantial Amendment to the PY2021 Action Plan recognizing new HOME-ARP funding was publicly noticed for a 30-day public comment period in accordance with the Collier County's Citizen Participation Plan and with HUD regulations. The HOME-ARP Substantial Amendment was advertised in the *Naples Daily News* on July 21, 2022 and January 26, 2023. The public comment period ran from January 26, 2023 through February 10, 2023. An initial public hearing was held on August 8, 2022 during the planning phase of the Allocation Plan. A second public hearing was held on February 9, 2023 at 9 AM to review the draft Substantial Amendment to the 2021 Annual Action Plan. One public comment was received during the advertising period.

In addition to the public notice and public comment period, Collier County requested key stakeholders in the community to participate in the online survey and/or direct interviews. Key stakeholders included representatives of social service organizations, homeless services providers, neighborhood associations, the CoC, the Housing Authority and other nonprofit organizations. Collier County also posted the public notice and draft HOME-ARP Allocation Plan to the County's website and published a notice of public hearing in the *Naples Daily News*.

Summarize the comments & recommendations received through the public participation process:

Collier County received one written submission containing three comments during the public comment period for the amendment of the Action Plan to receive HOME-ARP. No public comments were made during the public hearing. The submitted written comments recommended imposing a residency requirement of two years in order to receive assistance from the HOME-ARP program, working through private developers for the construction or management of housing, and segmentation and targeting of the homeless population.

Summarize any comments or recommendations not accepted and state the reasons why:

The HOME-ARP funding is intended to support the provision of affordable housing for qualified populations which already meet significant impediments to housing. Imposing additional restrictions will increase barriers to housing and the County will not explore such residency requirements. The County acknowledges that individuals experiencing homelessness have different needs both from a housing and support service perspective. However, while some activities, such as job training, may be eligible under McKinney-Vento, the support of the development of affordable housing has consistently been identified as a priority need in Collier County.

Needs Assessment and Gaps Analysis

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The CoC releases an annual Point-in-Time (PIT) Count that includes valuable data for addressing the needs of residents who are experiencing homelessness. The 2020 Naples/ Collier County CoC PIT count data was used to capture the most recent and relevant homeless population data due to alterations in methodology during the 2021 count to mitigate the effects of the COVID-19 pandemic.

According to the 2020 PIT count, White/ Caucasian residents are the largest demographic of people experiencing homelessness. Just over 78% of people experiencing homelessness are White/ Caucasian, 14% are Black or African American, and the remainder are American Indian or Alaskan Native, Asian, or multi-racial. 30% percent of overall homeless are Hispanic/ Latino. 62% of homeless individuals identify as Male. 78% are over the age of 24 and 21% being under the age of 18, mostly in households with other adults. About 13% were reported as chronically homeless. 127 individuals reported having a mental illness, 155 reported having a substance use disorder, 27 are veterans, 10 are unaccompanied youth, and 95 are victims of domestic violence.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	92	28	140	140	0								
Transitional Housing	54	20	144	144	6								
Sheltered Homeless						52	270	2	76				
Unsheltered Homeless						7	142	25	19				
Current Gap										+87	-11	-131	-131

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Populations At-risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability. Using HUD's 2014-

2018 Comprehensive Housing Affordability Strategy (CHAS) data, the county has 12,075 households with incomes at or below 30% AMI, (over 8% of all County households). Forty-eight percent of these households are renter households. Households at-risk of homelessness include an estimated 21,785 households who are extremely cost burdened, paying over 50% of their income toward housing and 23,315 who are cost burdened (above 30%, less than 50%). An estimated 15,380 LMI ($\leq 80\%$ AMI) renters are cost burdened at the 30% mark, approximately 11% of total households in the County. The County's demographic makeup is primarily 84.5% White/ Caucasian and 28% Hispanic or Latino (American Community Survey (ACS) 2016-2020).

According to ACS data 20,184 renters in the County were cost burdened between 2016-2020. Of those renters, 27.7% were over the age of 65. Additionally, according to ACS data, 27.67% (5,585 households) of cost burdened renters earned less than \$20,000 between 2016-2020, while only approximately 2,366 rental units offer a gross rent price within the needed range to prevent being cost burden. In other words, there is a lack of about 3,219 affordable rental units for households making under \$20,000 a year.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to the National Coalition Against Domestic Violence 37.9% of women and 29.3% of men in Florida experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner stalking in their lifetimes. Statistics from the Florida Department of Law Enforcement document that there was a total of 1,686 domestic violence offenses with 668 arrests in Collier County during 2019. There is no data available regarding size and demographics of victims of human trafficking. The State of Florida reported 738 human trafficking cases in 2020.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

There is a large overlap between those at-risk of homelessness (above data) and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Lack of affordability is the primary issue highlighted in data and consultation. Of the extremely cost burdened, 4,160 are renting households who are also in the extremely low-income range ($\leq 30\%$) and are considered at greatest risk of housing instability.

While there is insufficient data sources that match the exact definition of QP #4, we can glean general demographics and need from looking at the County's poverty levels. Poverty is often a direct correlation as it relates to households requiring housing assistance to prevent homelessness or to those being at-risk of housing instability. According to ACS, there are 41,222 (11% of County) residents below the poverty level, of which 26% are under 18 years old and 48.8% of those in poverty are above the age of 60. Of those living under the poverty level, an estimated 32,823 are White, 3,701 are Black or African American, 231 are Asian, 19,059 are Latino, and 2,438 are mixed race. There are more females (21,459) under the poverty level than males (19,763).

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The primary unmet need is the availability of units for residents experiencing homelessness. In particular, there is a need for approximately 130 beds for people who do not have children. Further, there is a shortage of homeless shelter units for families. During our consultation, many respondents highlighted the need for additional affordable housing within the County. As well as the need for supportive services. Stakeholders highlighted the following unmet service needs for the homeless population: case management, housing counseling, mental health services, supportive housing, and additional outreach services. It was also noted that there is an absence of sufficient homeless day-shelter resources for health, hygiene, counseling and severe weather refuge. Of note, many of the stakeholders highlighted a growing senior and disabled homeless population and no shelter that meets their needs, access to mental health services is a huge issue.

Populations At-risk of Homelessness as defined in 24 CFR 91.5

The unmet needs for the populations at risk of homelessness include sufficient stock of available, affordable rental units and resources for rental or utility deposit assistance. Ultimately, there is a lack of inventory of affordable homes for purchase (primary method of stabilizing workforce), inventory of affordable rental units (with long term affordability periods). More development of affordable rental housing units would help ease the financial burden faced by many. More affordable, supportive transitional and permanent housing apartments, group homes, housing for Veterans and seniors, etc. would benefit the County. Housing counseling, mental health services, and legal aid/ landlord mediation for eviction proceedings were highlighted during our consultation as service needs for the at-risk of homelessness and greatest risk of housing insecurity.

Further, ACS estimates 54% of the County's renters are costs burdened (paying over 30% of income to housing costs). This amounts to a little over 20,637 households who are cost burdened. Lack of affordable housing inventory and a persistent affordability gap challenge both populations recovering from homelessness and those households at risk of homelessness or housing instability. Those at-risk of homeless or housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts. Supportive services such as housing or financial counseling, landlord mediation for eviction proceedings will also benefit these groups.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

According to the 2022 Domestic Violence Counts Report for Florida conducted by the National Network to End Domestic Violence victims of domestic violence made 31 requests for shelter, housing, and other supportive services that providers could not provide. With approximately 90% of these unmet requests being for housing and emergency shelter. There is one organization in Collier County that provides emergency shelter and supportive services to victims of domestic and sexual violence and human trafficking, there are not enough beds available to meet the

needs of victims in the area. Funding for additional transitional housing units and funding to maintain those units are needed. Permanent housing units are needed for survivors when they exit emergency shelter or graduate from The Shelter's Transitional Housing Program.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The unmet needs for the populations needing assistance to prevent homelessness or at risk of greater housing instability mirror those from above, including rental payment assistance or utility deposit assistance and development of affordable rental housing units. Housing counseling, mental health services, and homeless prevention were highlighted during our consultation as service needs for those at greatest risk of housing insecurity. Healthcare assistance greatly benefits those at-risk of housing instability who are also disabled or elderly.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

There are multiple organizations providing services in Collier County, such as homeless assistance providers, victim service providers, nonprofit organizations, public housing agencies, mental health agencies and government-based organizations. Many social service agencies in Collier County provide benefits to homeless individuals and families to address homelessness. These organizations provide many services to their clientele, including but not limited to counseling, case management, life skills training, financial literacy classes, and victim advocacy, all of which help residents to develop the skills and knowledge to transition into permanent housing or independent living and to maintain steady employment. The goal of providing supportive services is self-sufficiency.

The Collier County Housing Authority (CCHA) has been committed to providing safe, decent, and affordable housing to low-income residents in Collier County since 1966. The CCHA administers a number of programs, such as the Farm Worker Housing, the Housing Choice Voucher Program, and the Family Self-Sufficiency Program, to promote self-sufficiency and economic opportunity for local residents. These programs are income based and the eligibility requirements are set by HUD. The CCHA owns and manages four public housing developments: 276 units of low-income housing in Farm Worker Village, 315 units of farm labor housing also in Farm Worker Village, 30 units of farm labor housing known as Collier Village, and a 192-bed dormitory known as Horizon Village. In addition, CCHA serves an over 3,100 persons through the administration of the Section 8 rental assistance program and Family Self Sufficiency Program to provide support services to low, elderly, disabled, and homeless persons living in Collier County.

Collier County partners with the **Hunger & Homeless Coalition of Collier County** to address the needs individuals and families experiencing homelessness or at risk of homelessness. The Hunger & Homeless Coalition of Collier County is a working group whose mission is to “support the planning, delivery and coordination of high-quality services to the hungry, homeless, and those at risk of homelessness in our community.” The group also works to provide programs and

services related to housing, mental and physical health, nutrition, clothing, and education. According to the 2021 Housing Inventory Count, the Coalition has 91 Rapid Re-Housing beds.

The Shelter for Abused Women and Children in Naples is the only domestic violence center in Naples. Additionally, the organization is Collier County's official service provider for human trafficking victims, as ratified by Collier County Commissioners and Collier County Sheriff's Office in 2016. Its services include emergency shelter (where stays average 29 days) and a transitional housing program (where residents can live for up to 2 years). The organization currently has two emergency shelters. The Beau Venturi Home, located in Naples, is a 60-bed emergency shelter serving victims of domestic violence. The Shelley Stayer Shelter, also a 60-bed emergency shelter, was built in 2020 in Immokalee to serve victims of domestic violence and human trafficking. Other services include a confidential hotline, safety planning, counseling and support groups in English and Spanish, court advocacy and assistance with daily needs such as food, clothing, toiletries, and household items.

St. Matthew's House operates several facilities in Collier County, including emergency and transitional housing in Naples, an emergency shelter in Immokalee (Immokalee Friendship House), and transitional supportive apartments for persons with substance abuse or mental health needs. Other services include a food pantry, thrift store, counseling and case management, and access to referrals for medical, mental health, and substance abuse needs through partnerships with other organizations in Collier County.

Youth Haven is a 24-hour residential shelter for children removed from their homes due to abuse, neglect, or abandonment. In addition to a 23-bed emergency shelter, Youth Haven offers a child and family counseling center, in-home parenting classes, case management, and a teen drop-in center with showers, laundry facilities, and meals. Typical length of stays range from 45 to 60 days until children are placed in foster care or with a relative.

Providence House provides a faith-based, transitional housing and self-sufficiency program for motivated women with young children who are homeless or at risk of being homeless. These women lack the long-term support necessary to acquire the assets foundational to reestablishing their families. The two-year accountability program not only encourages the development of self-efficacy, but it also provides women and their children with resources that they need to become independent. Providence House also offers case management, life skills training, and counseling referrals.

Wounded Warriors assists with the needs of Veterans and their families, with the focus on education, housing, and mental health. Wounded Warriors of Collier County is dedicated to ending Veteran homelessness in Collier County by employing various housing models. Its Alpha House is a transitional living facility for Veterans struggling with mental health and/or substance abuse issues. Additionally, it operates the Bravo House, a long-term supportive housing program. It is a three-bedroom home serving Veterans with fixed incomes.

The **Jewish Family & Children Services (JFCS)** provides services to Veterans and their families through a client-centric approach. JFCS provides care for Veterans to maintain self-sufficiency and facilitates solutions to living a healthy lifestyle with a support system. Through the Operation Military Assistance Program (OMAP), Veterans are able to gain the assistance needed to obtain or maintain permanent housing, removing the barriers to living a stable, comfortable, and more satisfying life. According to the 2021 Housing Inventory Count, JFCS has 19 SSVF Rapid Re-Housing beds dedicated to Veteran families.

Collier County will continue to increase its efforts to implement anti-poverty strategies for the citizens of Collier. The County will strive to increase its efforts in assisting homeowners and renters with housing rehabilitation and renovation of affordable housing to decrease the financial burden on low-to-moderate-income persons. Collier County will actively work to address the need for more decent and affordable housing by continuing to prioritize the investment of funds into all its housing programs. In the interest of preserving affordable housing, the County will continue to support the use of HOME program funds for activities such as: down-payment assistance, land acquisition, TBRA, and single/multifamily acquisitions and rehabilitation. Additionally, the County will continue to utilize CDBG program funds to rehabilitate owner-occupied homes.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

As noted above, the primary gap in the shelter and housing inventory is the availability of beds for households without children. There are only approximately 314 beds available and nearly 412 residents who occupy or need a bed. Additionally, on the 2021 Housing Inventory Chart, there are 64 permanent supportive housing beds for households without children and 0 permanent supportive housing beds for families with children.

The availability of housing units does not meet the needs of the qualifying population. There is a need for quality affordable housing units of multiple sizes in neighborhoods throughout the County. The renter vacancy rate in 2019 was 7.14% with those rates estimated to be much lower since the pandemic. Low-income renters are at the greatest risk of being unable to find affordable units, particularly extremely low-income households.

There is also a gap in emergency shelter and permanent housing assistance for individuals and families that are fleeing domestic violence. The County has emergency shelter beds that remain fully occupied with no permanent housing beds (permanent supportive housing, other permanent housing, rapid rehousing) dedicated to the population.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Collier County recognizes the definition of Other Populations set forth by HUD in the CPD Notice (Families Requiring Services or Housing Assistance to Prevent Homelessness or At Greatest Risk of Housing Instability). The criteria related to these categories include households/persons who

are (1) extremely low-income with a severe cost burden, or households with (2) an annual income that is less than or equal to 50% of the area median income meet one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5. No further characteristics of housing instability have been defined in the County’s Consolidated Plan; thus the County will use the criteria listed in first six conditions listed in the “At risk of homelessness” definition established at 24 CFR 91.5

Identify priority needs for qualifying populations:

The analysis above and consultation with key stakeholders have identified the following priority needs:

1. Development of Affordable Rental Housing
2. Rental assistance
3. Supportive Services (McKinney-Vento Supportive Services, Housing Counseling Services)

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

To determine the level of need and gaps Collier County looked at both qualitative and quantitative measures. Data from the US Census, CHAS, 2020 CoC Point in Time Count, and 2020 Housing Inventory Count were used in partnership with feedback and on-the-ground insights from key stakeholders in the area. The takeaways from data analysis and stakeholder input were incorporated into the needs assessment.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The County expects to administer programs directly. Once the County has received the full HOME-ARP grant award from HUD, the County will conduct a Request for Proposals for a specified period of time to make it a more competitive process in awarding these funds. During that time any organization, developer, subrecipient, or Community Housing Development Organization (CHDO) is eligible to apply. At the close of the application period, all applications received will be reviewed for completeness, eligibility, and their ability to deliver on the priority needs identified within this plan. Each applicant will also be reviewed for their ability to carry out the project meeting all eligibility criteria.

Award(s) will be made based on the applicant's project scope as it pertains to the outlined priority needs in this plan as well as the applicant's familiarity with utilizing federal funding and ability to comply with all federal and local requirements.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The County will administer the program. The County has not yet expended any of the HOME-ARP administrative funds.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$2,319,717		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$409,361	15 %	15%
Total HOME-ARP Allocation	\$ 2,729,078		

Additional narrative, if applicable:

Development of Affordable Rental Housing

Collier County will allocate \$2,319,717 (85%) of its allocation to the development of affordable rental housing. The County will seek to maximize use of funds by leveraging with other sources of funding as available. Please see further information on page 20 in the *Housing Goals* section.

Administration

Fifteen percent of the allocation is set aside for costs of overall HOME-ARP program management, coordination, monitoring, and evaluation. Expenditures may include salaries, wages, and related costs of the county's staff and/or administrative services performed under third party contracts or agreements.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

After reviewing the gap analysis for shelter and affordable housing availability, as well as analyzing local capacity and other sources of funding as it relates to community needs, the County identified eligible activities that will assist individuals and families of the most vulnerable qualified populations. The gap analysis shows that there is a need to increase the supply of affordable housing as a means to increase availability of permanent supportive housing and provide opportunities for LMI households who are at-risk of homelessness or housing instability. Developing affordable rental housing was highlighted by stakeholders as the top priority and these efforts work as a more permanent solution to assist the QPs.

Despite the need for rental assistance also being identified as a top County need, the County determined the one-time HOME-ARP allocation was best used as a long-term capital investment, hence, the bulk of funding going toward developing affordable rental housing. Furthermore, Supportive Services and TBRA programs can be more difficult to run, given the relative size of the grant and available operating or administration dollars to support potential subrecipients.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Collier County is in the process of planning an affordable housing project that will produce an estimated 250 total units. The County estimates 100 of these units will be new affordable rental units that will be produced using HOME-ARP funds.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

The primary goal will be to help address the lack of affordable housing in the county and to assist as many QP households as possible with rental assistance and supportive services. By adding affordable rental units to the housing stock, Collier County aims for the HOME-ARP allocation to offer a long-term solution that contributes to the overall goal of reducing homelessness and housing instability for the most vulnerable populations.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

Collier County will not provide preferences to any population or subpopulation

HOME-ARP Refinancing Guidelines

The County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

HOME-ARP Supporting Documentation

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

04/08/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

M-21-UP-12-0217

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Collier County Board of County Commissioners

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

59-6000558

*** c. UEI:**

JWKJKYRPLU6

d. Address:

*** Street1:**

3339 East Tamiami Trail

Street2:

Community and Human Services Div Suite 211

*** City:**

Naples

County/Parish:

Collier County

*** State:**

FL: Florida

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

34112-5746

e. Organizational Unit:

Department Name:

Public Services

Division Name:

Community and Human Services

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

*** First Name:**

Kristi

Middle Name:

*** Last Name:**

Sonntag

Suffix:

Title:

Community and Human Services Director

Organizational Affiliation:

*** Telephone Number:**

(239) 252-2273

Fax Number:

*** Email:**

Kristi.Sonntag@colliercountyfl.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

* Title:

HOME-American Rescue Plan

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Allocation plan for HOME-ARP funds to benefit qualifying populations with homelessness assistance and supportive services.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant 14, 25

* b. Program/Project HOME

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 03/01/2023

* b. End Date: 09/30/2030

18. Estimated Funding (\$):

* a. Federal	2,729,078.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	2,729,078.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Amy

Middle Name:

* Last Name: Patterson

Suffix:

* Title: County Manager

* Telephone Number: (239) 252-8383 Fax Number:

* Email: Amy.Patterson@colliercountyfl.gov

* Signature of Authorized Representative:

Amy Patterson

* Date Signed: 3/9/23

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Manager
APPLICANT ORGANIZATION Collier County	DATE SUBMITTED 2/23/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Manager
APPLICANT ORGANIZATION Collier County	DATE SUBMITTED 2/23/2023

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

2/23/2023
Date

County Manager

Title

Naples Daily News

PART OF THE USA TODAY NETWORK

Published Daily
Naples, FL 34110

CC HOUSINGHUMAN VETE RAN SERV
3299 TAMIAMI TRL E STE700

NAPLES, FL 34112

Affidavit of Publication

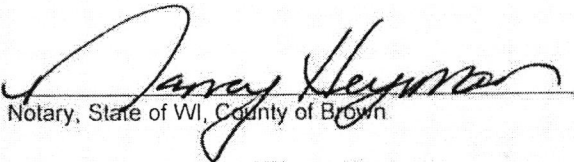
STATE OF WISCONSIN
COUNTY OF BROWN

Before the undersigned they serve as the authority, personally appeared said legal clerk who on oath says that he/she serves as **Legal Clerk** of the Naples Daily News, a daily newspaper published at Naples, in Collier County, Florida; distributed in Collier and Lee counties of Florida; that the attached copy of the advertising was published in said newspaper on dates listed. Affiant further says that the said Naples Daily News is a newspaper published at Naples, in said Collier County, Florida, and that the said newspaper has heretofore been continuously published in said

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Issue(s) dated: 07/21/2022

Subscribed and sworn to before on July 21, 2022:


Notary, State of WI, County of Brown

5.15.23

My commission expires

Publication Cost: \$1,456.00

Ad No: 0005342594

Customer No: 1304214

PO #:

of Affidavits 1

This is not an invoice

NANCY HEYRMAN
Notary Public
State of Wisconsin

PUBLIC NOTICE:
HOME-ARP Allocation Plan Public Hearing
Published on: July 21, 2022

Collier County Community and Human Services (CHS) is developing a substantial amendment to their FY 2021 Annual Action plan to include the use of funds in the following U.S. Department of Housing and Urban Development (HUD) programs, estimated as of June 30, 2022 for CDBG (\$100,000), HOME (\$1,442,580), SHIP (\$1,880,472), ESG (\$23,108), and for \$2,729,078.00 awarded in HOME-ARP funding.

The HOME-ARP Program under Section 3205 of the American Rescue Plan Act of 2021 (p.L. 117-2) ("ARP") for HOME Investment Partnerships (HOME) Program provides housing, homelessness assistance and supportive services, and non-congregate shelter. During the development of the Collier County's HOME-ARP Allocation Plan and prior to submission of the plan to HUD, the County is required to hold at least one public hearing.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, fleeing or attempting to flee, domestic violence, sexual assault, stalking, or human trafficking, as defined by HUD, or in other vulnerable populations.

As stated, Collier County has been awarded \$2,729,078.00 in HOME-ARP funding. The County may undertake certain activities including a) administrative and planning, b) HOME-ARP rental housing, c) tenant-based rental assistance, d) supportive services, and e) acquisition and development of non-congregate shelter.

During the development of the HOME-ARP Allocation Plan, the County intends to emphasize the following range of activities to reduce homelessness and increase housing stability:

- HOME-ARP Rental Housing (production or preservation of affordable housing)
- Acquisition and Development of Non-Congregate Shelter Units

The public hearing will focus on obtaining views from citizens, non-profit agencies, neighborhood associations, residents of assisted housing and other interested parties on housing and homelessness needs to be undertaken with federal funds from HUD HOME-ARP funding. The purpose of the public hearing is to provide reasonable notice and an opportunity to comment for plan amendments to the Collier County's current Citizen Participation Plan.

The public hearing will be held on Monday, August 8, 2022, at 9:30 a.m. at 3303 Tamiami Trail East (Human Resources-Building B) Human Resources Training Room and via zoom at the link below. Participation is strongly encouraged.

Assistance can be made for persons with disabilities or requirements for Spanish speaking residents upon request by calling Collier County Human Services, 239-252-8999.

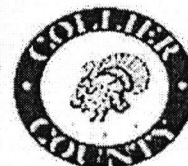
Topic: HOME-ARP Community Virtual Public Hearing
Time: August 8, 2022, 9:30 a.m. Eastern Time (US and Canada)

Join Zoom Meeting
<https://us02web.zoom.us/j/89272770759?pwd=SXhmSXJiWXJ3eXZWbFRNbUp6L2dQU09>
Meeting ID: 892 7277 0759
Passcode: 820177

Organizations or firms seeking information, technical assistance with the application, or having any questions may contact Tracey Smith at 239-252-1428 or email at tracey.smith@colliercountyfl.gov.

Collier County is an Equal Opportunity Employer. Collier County complies with the Fair Housing Act (42 U.S.C. 3600, et seq) and Collier County Fair Housing Ordinance 92-9.

Note: Publish 1 time with Legal Notices on Thursday, July 21, 2022



AVISO PÚBLICO:
Audiencia pública del Plan de Asignación HOME-ARP
Publicado el: 21 de Julio del 2022

El Departamento de Servicios Comunitarios y Humanos del

condado de Collier (CHS) está desarrollando una enmienda sustancial a su plan de acción anual del año fiscal 2021 para incluir el uso de fondos en los siguientes programas del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (U.S. Department of Housing and Urban Development, HUD), estimados al 30 de junio de 2022 para CDBG (\$100,000), HOME (\$1,442,580), SHIP (\$1,880,472), ESG (\$23,108), y para \$2,729,078.00 otorgados en fondos HOME-ARP.

El Programa HOME-ARP en virtud de la Sección 3205 de la Ley del Plan Americano de Rescate de 2021 (p.L. 117-2) ("ARP") para el programa HOME Investment Partnerships (HOME) proporciona vivienda, asistencia a personas sin hogar y servicios de apoyo, y albergue no colectivo. Durante el desarrollo del Plan de Asignación HOME-ARP del condado de Collier y antes de la presentación del plan al HUD, el condado está obligado a celebrar al menos una audiencia pública.

Para hacer frente a la necesidad de asistencia a las personas sin hogar y de servicios de apoyo, el Congreso asignó 5,000 millones de dólares en fondos ARP que se administrarán a través de HOME para llevar a cabo cuatro actividades que deben beneficiar principalmente a las personas y familias que reúnan los requisitos necesarios y que no tengan hogar, que estén en riesgo de no tenerlo, que huyan o intenten huir, que sufran violencia doméstica, agresión sexual, acoso o tráfico de personas, según la definición del HUD, o que pertenezcan a otras poblaciones vulnerables.

Como se ha dicho, el condado de Collier ha recibido \$2,729,078 en fondos HOME-ARP. El condado puede llevar a cabo determinadas actividades, entre las que se incluyen: a) administrativas y de planificación, b) de alquiler de viviendas HOME-ARP, c) de ayuda al alquiler basada en el inquilino, d) de servicios de apoyo, y e) de adquisición y desarrollo de albergues no colectivos.

Durante el desarrollo del Plan de Asignación HOME-ARP, el condado pretende hacer hincapié en la siguiente gama de actividades para reducir la falta de vivienda y aumentar la estabilidad de la misma:

- Viviendas de alquiler HOME-ARP (producción o conservación de viviendas asequibles)

- Adquisición y desarrollo de unidades de albergue no colectivas

La reunión se centrará en obtener las opiniones de los ciudadanos, las agencias sin fines de lucro, las asociaciones de vecinos, los residentes de las viviendas asistidas y otras partes interesadas sobre las necesidades de vivienda y de personas sin hogar que se llevarán a cabo con los fondos federales de la financiación HOME-ARP del HUD. El propósito de la reunión es proporcionar un aviso razonable y una oportunidad para comentar las enmiendas al Plan de Participación Ciudadana actual del condado de Collier.

La audiencia pública se celebrará el lunes 8 de agosto de 2022, a las 9:30 de la mañana en la sala Human Resources Training Room, ubicada en 3303 Tamiami Trail East (Human Resources, Building B) y a través de Zoom en el siguiente enlace. Se anima encarecidamente a participar.

Se puede proporcionar asistencia a las personas con discapacidades o requisitos para los residentes de habla hispana, previa solicitud, llamando al Departamento de Servicios Humanos del Condado de Collier, 239-252-8999.

Tema: Audiencia pública virtual de la comunidad de HOME-ARP

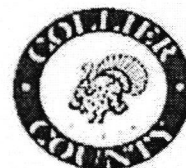
Hora: 8 de Agosto del 2022, 9:30 a.m., hora del este (EE. UU. y Canadá)

Unirse a la reunión de Zoom
<https://us02web.zoom.us/j/89272770759?pwd=SXhmSXJlWXJ3eXZWbFRNbUp6L2dQU09>
Identificación para el evento: 892 7277 0759
Código de acceso: 820177

Las organizaciones o empresas que busquen información, asistencia técnica para la solicitud o tengan alguna duda pueden dirigirse a Tracey Smith al 239-252-1428 o por correo electrónico a tracey.smith@colliercountyfl.gov

El condado de Collier es un empleador que ofrece igualdad de oportunidades. El condado de Collier cumple con la Ley de Vivienda Justa (42 USC 3600, et seq) y la Ordenanza 92-9 de Vivienda Justa del condado de Collier.

Nota: Publicar una vez con avisos legales el Jueves, Julio 21, 2022



e con HUD para verificar el último día real del periodo de
objeción.
Pub Date: July 21, 2022; #5342594

Naples Daily News

PART OF THE USA TODAY NETWORK

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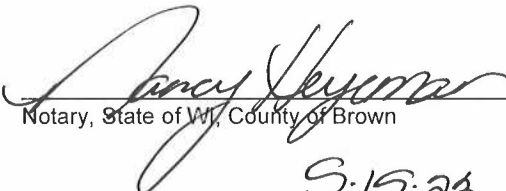
STATE OF WISCONSIN
COUNTY OF BROWN

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Issue(s) dated: 01/26/2023

Subscribed and sworn to before on January 26, 2023:


Notary, State of WI, County of Brown

S.15.23

My commission expires

NANCY HEYRMAN
Notary Public
State of Wisconsin

Publication Cost: \$889.00

Ad No: 0005570483

Customer No: 1304214

PO #:

of Affidavits 1

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**PUBLIC NOTICE
COLLIER COUNTY, FLORIDA
PUBLIC COMMENT PERIOD & PUBLIC HEARING
HOME INVESTMENT PARTNERSHIPS PROGRAM
AMERICAN RESCUE PLAN (HOME-ARP)**

NOTICE is given that Collier County was awarded \$2,729,078 in HOME-American Rescue Plan ("HOME-ARP") funds in a one-time allocation from the U.S. Department of Urban Housing and Development ("HUD"). Federal HOME-ARP funding was created to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The HOME-ARP Allocation Plan ("the Plan") defines the use of the HOME-ARP grant funds to address these needs within the HUD-approved eligible activities. The County will make funds available for activities once the HOME-ARP Allocation Plan's associated consultation, public participation process, and HUD approval have been completed through the substantial amendment of the PY 2021 Annual Action Plan.

A draft of Collier County's HOME-ARP Allocation Plan will be available for a 15-day public comment period. Notice is also given that a public hearing will be held to allow the public to review and make comments.

Citizens can view the draft Plan from January 26, 2023 to February 10, 2023 at the Community and Human Services Division office at 3339 East Tamiami Trail, Health and Public Services Building H, Room 213 Naples, Florida 34112, and it can also be viewed and downloaded from the County's website <https://www.colliercountyfl.gov/government/public-services/divisions/community-and-human-services-division/housing-programs/grants>.

Public comments regarding the draft HOME-ARP Allocation Plan can be submitted by mail, delivered to the address above or via email at housinginfo@colliercountyfl.gov

Public Hearing: A public hearing will be held to review and discuss the draft Plan on February 9, 2023, at 9:00 a.m.-11:00 a.m. at Community and Human Services offices at 3339 E Tamiami Trail, Building H, 3rd Floor, Naples FL 34112. Collier County will consider any comments or views of citizens received in writing or orally at the public hearing in preparing the Plan.

For further information, please contact the Community and Human Services Division at (239) 252-4228.

Accessibility: Collier County does not discriminate on the basis of disability in the admission to, access to, or operations of programs, services, or activities, including the public participation process. Assistance can include, but is not limited to, assistance for non-English speaking persons and for those who require a sign language interpreter. If you require special aid or services as addressed in the Americans with Disabilities Act or require someone to translate or sign, please contact the Community & Human Services office at (239) 252-4228. Arrangements for assistance should be made through the Collier County Community and Human Services Division at least five (5) working days prior to the public hearing. Residents are encouraged to attend and participate. For additional information contact Lisa Carr at (239) 252-2339 or lisa.carr@colliercountyfl.gov.

**AVISO PÚBLICO
CONDADO DE COLLIER, FLORIDA
PERÍODO DE COMENTARIOS PÚBLICOS Y AUDIENCIA PÚBLICA
PROGRAMA DE ASOCIACIÓN PARA LA INVERSIÓN EN VIVIENDA
PLAN DE RESCATE ESTADOUNIDENSE (HOME-ARP)**

Se INFORMA que el condado de Collier recibió \$2,729,078 en fondos del Plan de rescate estadounidense HOME (HOME-American Rescue Plan, HOME-ARP) en una asignación única del Departamento de Vivienda y Desarrollo Urbano de los EE. UU. (Housing and Urban Development, HUD). Los fondos federales HOME-ARP se crearon para ayudar a las personas o a las familias que se encuentran sin hogar, en riesgo de quedarse sin hogar y a otras poblaciones vulnerables, proporcionándoles viviendas asequibles, asistencia para el alquiler, servicios de apoyo y alojamiento no colectivo, con el fin de reducir la cantidad de personas sin hogar y aumentar la estabilidad de la vivienda. El Plan de asignación HOME-ARP ("el Plan") define el uso de los fondos de la subvención HOME-ARP para abordar estas necesidades dentro de las actividades elegibles aprobadas por el HUD. El condado pondrá a disposición los fondos para las actividades una vez que se haya completado la consulta asociada al Plan de asignación HOME-ARP, el proceso de participación pública y la aprobación del HUD a través de la enmienda sustancial del Plan de Acción Anual PY 2021.

Un borrador del Plan de asignación HOME-ARP del condado de Collier estará disponible para un período de comentarios públicos de 15 días. También se informa que se celebrará una audiencia pública para permitir que el público examine la propuesta y realice comentarios.

Los ciudadanos pueden acceder al borrador del plan desde el 26 de enero de 2023 hasta el 10 de febrero de 2023 en la oficina de la División de Servicios Comunitarios y Humanos ubicada en 3339 East Tamiami Trail, Edificio H de Salud y Servicios Públicos, Sala 213 Naples, Florida 34112, y también se puede ver y descargar de la página web del condado <https://www.colliercountyfl.gov/government/public-services/divisions/community-and-human-services-division/housing-programs/grants>.

Los comentarios del público sobre el proyecto del Plan de asignación HOME-ARP pueden enviarse por correo, a la dirección arriba indicada, o por correo electrónico a la siguiente dirección housinginfo@colliercountyfl.gov

Audiencia pública: se celebrará una audiencia pública para revisar y analizar el borrador del Plan el 9 de febrero de 2023

de las 9:00 a. m. a las 11:00 a. m. en las oficinas de Servicios Comunitarios y Humanos en 3339 E Tamiami Trail, Edificio H, 3.º piso, Naples FL 34112. El condado de Collier tendrá en cuenta los comentarios y opiniones de los ciudadanos recibidos por escrito o en forma oral en la audiencia pública cuando se prepare el plan.

Para obtener más información, comuníquese con la División de Servicios Comunitarios y Humanos llamando al (239) 252-4228.

Accesibilidad: el condado de Collier no discrimina por motivos de discapacidad en la admisión, acceso u operaciones de programas, servicios o actividades, incluido el proceso de participación pública. La asistencia puede incluir, entre otros, asistencia para personas que no hablan inglés y para las que requieren un intérprete de lenguaje de señas. Si necesita ayuda o servicios especiales como se aborda en la Ley de Estadounidenses con Discapacidades o si necesita que alguien traduzca o un intérprete de lenguaje de señas, comuníquese con la oficina de Servicios Comunitarios y Humanos llamando al (239) 252-4228. Se deben hacer arreglos para recibir asistencia a través de la División de Servicios Comunitarios y Humanos del Condado de Collier al menos cinco (5) días hábiles antes de la audiencia pública. Se invita a los residentes a asistir y participar. Para obtener más información, comuníquese con Lisa Carr llamando al (239) 252-2339 o escribiendo a lisa.carr@colliercountyfl.gov.

Pub Date: Jan. 26, 2023 #5570483

Collier County, FL
HOME-American Rescue Plan
Allocation Plan

Public Comment Recommendations regarding Allocation Plan

Respectfully submitted by: Richard Forman, richard@hvgllc.com
Dated: February 9th, 2023



Conclusions

Collier County should enact a strong approach towards affordable housing and homelessness as without intervention, policies or procedures, the problem is going to grow. There are three (3) recommendations, and they are detailed and supported below:

- **RESIDENCY REQUIREMENTS:**

The County needs to prioritize the needs of established residents. It is a waste of valuable resources to provide assistance or allocation of affordable housing units to recent arrivals. Currently, residents who have been in Collier County for 2 years or longer have no greater priority than does someone that arrived in our County on Thursday of last week. This is wrong and priority should be established for our community. In fact, by providing housing support for recent arrivals, the County might in fact be encouraging homeless to migrate here.

- **PRIVATE DEVELOPMENT: PUBLIC SUPPORT**

The County government should not be the position of building or managing housing stock. If any housing stock is to be created it should be done so by private developers. The role of the County should be to incentivize, support and otherwise develop policy recommendations that can be put into place by private developers. The County should not put itself in a position to operate or develop housing as it will inevitably be done far less efficiently, more politicized and ultimately a strain on our public resources.

- **SEGMENTATION:**

I recognize that this hearing is mostly about homelessness or those at risk of homelessness, however, as it relates to affordable housing/homelessness, it is important to segment the population. There are several segments of the population that fall under the affordable housing/homeless umbrella (see below). It is important that the County treat these segments differently. There is not one-size-fits-all approach towards homelessness and affordable housing and policy decisions should be made in light of these different segments. If we segment and exclude the homeless population that is either youth, mental health issues, substance abuse issues we are left with a very small population of about 127 individuals who are homeless (and not subject to one of the other groups listed above). For these individuals, we need to focus on career training, budgeting, self empowerment and how to secure a job that pays enough for them to afford suitable housing.

Residency Requirements

Collier County is a desirable place to live. Many residents have worked hard to afford the ability to live in this community. I think it's important to understand that there is no universal "right" to live in Collier. Everyone would quickly agree that this perspective doesn't make sense. The County has many desirable attributes including cleanliness, no personal income taxes, great schools, low crime rate, excellent parks and great weather. Those desirable attributes are well known and it is one of the reason that our County continues to grow in popularity.

According to the Census Bureau, the population of Collier County grew to 385,980 (July 1, 2021) from 375,752 (April 1, 2020)¹. This is an increase of 10,228 people or 2.7% over a fifteen (15) month period which represents an **annualized growth rate 2.2%**. To put that growth rate into perspective the overall growth in Florida is 1.9%² and the overall growth rate of the US Population is 0.4%³. **Collier County is growing at a rate that is almost six (6) times faster than the population of the United States.**

I'm sure that most of the people that moved to Collier County can support themselves, but for those that can't, they should not be a burden from day one

In-County vs. Out-of-County

In most states, there is a public college option that provides discounts to in-state residents. For Florida, the residency requirement for higher education is twelve (12) months⁴. It is reasonable to beneficiaries of affordable housing benefits also have a residency requirement. I don't know what is a reasonable amount of time, but I do think that citizens that have lived here and been a part of the community and most likely were contributors to the tax base should be given priority over new transients.

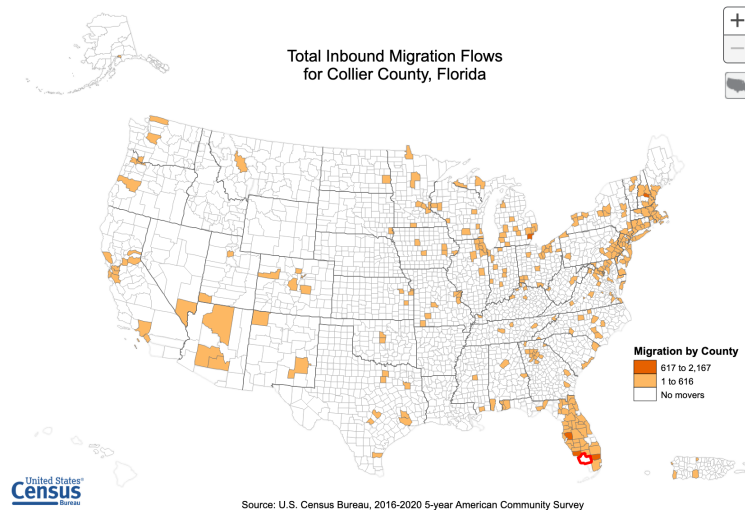
As it turns out most of the people moving to Collier County moved from other parts of Florida

¹ <https://www.census.gov/quickfacts/colliercountyflorida>

² Census Bureau, 2022 reporting, <https://www.census.gov/library/stories/2022/12/florida-fastest-growing-state.html>

³ <https://www.census.gov/newsroom/press-releases/2022/2022-population-estimates.html>

⁴ <https://www.floridashines.org/residency-for-in-state-tuition>



According to the Federal Reserve Bank of St Louis (FRED) the unemployment rate of Collier County peaked in march of 2020. However, since August of 2021, the unemployment rate dropped to 4.0% **and has stayed below 4.0% since that time.**⁵ Having no unemployment is a bad condition for the economy. Having no unemployment indicates that there will be an extreme pressure on rising wages, almost uncontrollable. The BLS (Bureau of Labor Statistics) considers full employment at the level of unemployment which does not created wage pressures greater than the rate of inflation. Bloomberg reports that the ⁶ “U.S. Federal Reserve economists currently put this so-called natural rate of unemployment at between 4.1 percent and 4.7 percent.”

⁵ <https://fred.stlouisfed.org/series/FLCOLL0URN>

⁶ <https://www.bloomberg.com/quicktake/full-employment>



Figure 1 - Unemployment rate in Collier County, Source St. Louis Fed

Given that Collier County is already at full employment, and that 98% of people that are looking or want a job have one and this situation has existed for well over a year we should discount the issue of COVID as a reason for unaffordable housing. As with all situations, of course there will be exceptions. However, in the aggregate on a community wide basis we should be thinking about solutions that are county-wide and not based upon unique, one-off situations. When we are thinking about the small cohort of individuals who are homeless the research shows that there are about 127 individuals based upon the PIT survey (excluding vets, youth, domestic abuse, substance abuse and mental disorder). I would surmise that they are unable to secure and retain a job that is able to pay enough to support their housing needs. This happens to be a very small cohort on a county wide basis.

Private Development, Public Support

Under no circumstances should Collier County own and/or operate its own housing program. Throughout this county, there is not one municipality that has done it right. The worst landlord in NYC is the NYC Housing Authority. The worst landlord in Chicago is the Chicago Housing Authority. Most, if not all, municipalities are unable to successful build or operate public housing. A quick sampling of some of these issues are detailed below:

- *“The public housing agency reportedly collected just 65% of the rent it charged during the 12 months leading up to December — the lowest in NYCHA’s (the New York City Housing Authority) history.”*⁷
- *Tracey Scott, the CHA’s (Chicago Housing Authority) chief executive, was barraged with complaints about poor building conditions, questions about the agency’s deal to lease land to the Chicago Fire soccer team and concerns about its vacant units amid the city’s homeless crisis.*⁸
- *“The U.S. Department of Housing and Urban Development took possession of the Slidell Housing Authority (New Orleans, LA) — which administers federally funded affordable housing programs for the city —after finding the agency in “substantial default”.*⁹
- *“The city of Annapolis has asked a federal judge to consider placing its troubled public housing authority in receivership”.*¹⁰

There are scores of examples of failed implementation of public housing managed by municipalities. I think it would be wise for Collier County to avoid this foreseeable problem.

Public-Private Partnership

A better solution is to figure out how to incentivize and motivate and assist private developers in developing and managing affordable housing. Developing real estate is challenging. It is unrealistic to assume that the government can do so more efficiently or effectively than can a private market oriented developer.

Developers are not the problem

Whenever the topic of affordable housing comes up, there is often the thread of accusation and vilification of landlords, landowners and developers. I find this intriguing because it seems to be

⁷ <https://nypost.com/2023/01/24/nycha-rent-collection-crashes-to-record-low/>

⁸ <https://blockclubchicago.org/2023/01/25/aldermen-residents-blast-public-housing-leader-at-city-council-hearing/>

⁹ <https://lailluminator.com/2023/01/11/federal-government-takes-over-slidell-housing-authority/>

¹⁰ <https://www.capitalgazette.com/maryland/annapolis/ac-cn-haca-annapolis-lawsuits-20221031-epqb4brhp5e43gdplt6h2ifrgq-story.html>

unique. When the restaurants increase prices, we don't accuse restaurateurs of price gouging. Developers and landlords are not much different than employees. Both groups are trying to maximize the value of their assets (landlords) or time (employees). When a tight labor market materializes, and an employee asks for a raise, is this considered price gouging? Unlikely. Typically, entities or people ask for more money when either, or both (a) their costs are going up due to inflationary pressure or (b) there is a supply constraint and their asset or labor is worth more than they are currently getting in the market. Either way, pricing is subject to market forces. Housing is no different. Housing is like any other good/service (albeit a lot more fundamental to our health and happiness than is a luxury good).

It would be wise for Collier County to engage and partner with for-profit developers

Homeless and Affordable Housing Segmentation

- As it relates to those different segments, there are a lot of comorbidity or multiple issues which affect people's ability to afford housing.
 - **Homeless/affordability challenged segmentation**
 - **Mental health issues – treatment required, not a housing or economic issue, per se. In the 2020 PIT count there were 127 individuals with mental illness, which represents 31% of the Adult homeless population¹¹**
 - **Substance abuse – treatment required, not a housing or economic issue, per se. In the 2020 PIT count there were 155 individuals with a substance use disorder, which represents 38% of the Adult homeless population.¹²**
 - **The balance of the homeless (excluding vets, youth and victims of domestic abuse) are about 127 individuals. I would classify them as**

¹¹ This is based upon the Homeless Needs Inventory and Gap Analysis Table, Data Sources 1 from HOMEARP Allocation. This data excludes vets, youth and victims of domestic abuse.

¹² *ibid.*

underemployed or underpaid – for this segment, programs should focus on training and self sufficiency

- Seniors on a fixed income who have no employment nor ability to secure employment
- Civil servants/Heroes (EMS, Fireman, Deputy Sheriffs, Hospital personnel, etc.) who are gainfully employed
- Workers for private employers who are presumably underpaid or not paid enough and therefore qualify for affordable housing based upon their income levels.

Other comments; COVID

I think it is time to stop attributing problems in our economy or in our population to COVID. Not only did the government spend unheralded sums of money to mitigate the economic impact of COVID, more importantly, the county is now at more than fully employment and there are too many jobs chasing too many employees. This dynamic has existed in Collier County for the past 1-2 years and I think it is implausible that someone that is both willing and capable cannot find suitable well-paying employment in today's market. I'm not negating the massive toll that domestic abuse, substance abuse, or mental disorders exacts upon the affected; In this section, I'm trying to discuss the segment of the population that is not afflicted by these problems.

Unlike most of the US, Collier County remained, for the most part, open during COVID. Our businesses were open, our stores were open and most importantly our schools were open. While I'm sure there are exceptions, for the most part, employees in Collier County should have remained relatively unscathed due to COVID.

I think that using COVID as a reason for homelessness (again exclusive abuse, disorder, youth, etc.) or loss of housing (today) is a specious argument.