

City of Los Angeles

HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) Allocation Plan

February 16, 2023

Prepared by:

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City of Los Angeles HOME-ARP Allocation Plan
Participating Jurisdiction: City of Los Angeles
Date of Original Submission: May 17, 2022
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INTRODUCTION

The City of Los Angeles has been allocated \$99,891,031 of HOME-American Recovery Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the City of Los Angeles (the City) must develop a HOME-ARP Allocation Plan that will become part of the City's 2018-2023 Consolidated Plan by substantial amendment. The HOME-ARP Allocation Plan must include:

- A summary of the consultation process and results of upfront consultation;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
- An estimate of the number of housing units for qualifying populations the PJ will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.
- HOME-ARP Refinancing Guidelines; and
- Certifications and SF-424, SF-424B and SF-424D Forms

Qualifying Populations and Activities

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

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

1. Homeless, as defined in 24 CFR 91.5 *Homeless (1), (2), or (3)*;
2. At risk of Homelessness, as defined in 24 CFR 91.5 *At risk of homelessness*;
3. Fleeing, or attempting to flee domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]);
4. Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

HUD Notice 21-10; Section VI. identifies these as eligible activities for HOME-ARP funds utilization to benefit qualifying populations:

1. Development of Affordable Rental Housing
2. Tenant-based Rental Assistance (TBRA);
3. Provision of supportive services;
4. Acquisition and development of non-congregate shelter;
5. Nonprofit capacity building and operating assistance; and
6. Program planning and administration

CONSULTATION

Prior to developing its HOME-ARP allocation plan, the City consulted with agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing and service delivery systems. In addition, the City utilized these consultations to determine the HOME-ARP eligible activities currently taking place within its jurisdiction and potential collaboration opportunities for administering HOME-ARP. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. In this section, the City describes its HOME-ARP consultation process and lists the organizations consulted, as well as summarizing the feedback received from these entities.

Homeless Service Providers, Domestic Violence Service Providers, Veterans Groups, Fair Housing and Civil Rights Groups, and Public/Private Agencies Addressing the Needs of Qualifying Populations and People With Disabilities

A virtual public meeting of the Commission on Community and Family Services (CCFS) was held on August 2, 2021, that included a consultation on the HOME-ARP funding awarded to the City. The CCFS is a 15-member board of community leaders that advise City decision-makers on issues of poverty in Los Angeles. The consultation included presenting information on the amount of funding awarded, qualifying populations, and categories of eligible uses, based on the information available from HUD at that time. Feedback from the commissioners addressed the logistics of implementing the new program within staff capacity.

Different organizations were represented at public meetings held on October 19 and 20, 2021 for the 2022-23 Annual Action Plan and HOME-ARP. The proposed HOME-ARP programs discussed included: Affordable Housing Managed Pipeline, Project Homekey, and the Eviction Defense Program. These programs fall into the rental housing and supportive services categories of the HOME-ARP regulations. Attendees at these meetings included Community Development Block Grant subrecipients and reiterated the need among clients for homeless prevention services in the form of emergency assistance as well as the need for more affordable housing throughout the city. Some of the organizations listed provide supportive services for homeless prevention to clients.

Table 1.A is a list of the organizations that participated in the August and October 2021 consultation meetings that the City conducted. The list also includes the qualifying populations that these organizations serve.

Table 1.A - Organizations Consulted at Public Meetings			
Agency/Org Consulted	Type of Agency/Org (Qualifying Population)	Method of Consultation	Feedback
Commission on Community and Family Services (CCFS)	Public agency that addresses the needs of all qualifying populations (QPs 1-4)	Virtual meeting on 8/2/21	Feedback addressed the logistics of implementing the new program within staff capacity.

Table 1.A - Organizations Consulted at Public Meetings

Agency/Org Consulted	Type of Agency/Org (Qualifying Population)	Method of Consultation	Feedback
1736 Family Crisis Center	Private agency - Homeless service provider that also provides domestic violence victim services and services for At-Risk of Homelessness (QP1 & QP3)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
All Peoples Community Center	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Central City Neighborhood Partners	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
HACLA Resident Advisory Council	Public agency - Addresses the needs of Other Populations where providing supportive services or housing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability (QP4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Haven Neighborhood Services	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Latino Resource Organization	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
New Economics for Women	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs

Table 1.A - Organizations Consulted at Public Meetings

Agency/Org Consulted	Type of Agency/Org (Qualifying Population)	Method of Consultation	Feedback
Northridge West Neighborhood Council	Public agency - Addressing the needs of all qualifying populations (QPs1-4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
PF Bresee Foundation	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Pico Neighborhood Council	Public agency - Addressing the needs of all qualifying populations (QPs1-4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Rampart Village Neighborhood Council	Public agency - Addressing the needs of all qualifying populations (QPs1-4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Tarzana Neighborhood Council	Public agency - Addressing the needs of all qualifying populations (QPs1-4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
The Children’s Collective, Inc.	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Toberman Neighborhood Center	Private agency - Homeless service provider that also provides services for At-Risk of Homelessness (QP1 & QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Van Nuys Neighborhood Council	Public agency - Addressing the needs of all qualifying populations (QPs1-4)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs

Table 1.A - Organizations Consulted at Public Meetings

Agency/Org Consulted	Type of Agency/Org (Qualifying Population)	Method of Consultation	Feedback
Volunteers of America Los Angeles	Private agency - Homeless service provider that also provides domestic violence victim services (QP1 & QP3)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs
Wilmington Jaycees Foundation	Private agency - At-Risk of Homelessness service provider (QP2)	Virtual public meetings on October 19 & 20, 2021	Expressed community needs and priorities relevant to the funding; supported more funding to address community needs

Continuum of Care

The City held a consultation meeting with representatives from the Los Angeles Homeless Services Authority (LAHSA), which operates the Los Angeles Continuum of Care (CoC), on December 16, 2021. At this meeting, the City presented the proposed uses of the HOME-ARP funds and requested feedback from CoC representatives regarding whether these uses would address the unmet needs identified by the CoC. The feedback from the CoC confirmed that the City’s proposed HOME-ARP uses are in line with the needs identified by the CoC. Further feedback provided was as follows:

- CoC staff noted that while there are many new sources for rental subsidies, there are not currently enough units in which to place clients from the street and those exiting shelter housing. Unit creation/financing and/or acquisition, as some of the City’s key proposed uses, is therefore front and center as a need.
- The CoC recommended that the City ask for additional feedback from providers regarding the City’s proposed ratio of rental housing units available to those experiencing chronic homelessness versus units available to any income-qualifying individuals or families. A subsequent meeting on January 18, 2022 was held to discuss strategies and processes to ensure that rental housing units are occupied by those most in need out of the qualifying populations in order to meet the most urgent need for housing.
- For homeless prevention programs, the CoC noted the need to align and delineate City and CoC prevention programs and referral processes. The City will continue to coordinate with the CoC during the implementation of its programs to ensure this alignment.
- The CoC’s overall recommendations for jurisdictions are to use HOME-ARP funds for:
 - Rental Housing, specifically, unit acquisition or development;
 - Supportive Services, specifically, rental subsidies and other homeless prevention supportive services

Local Public Housing Authority

Los Angeles Housing Department (LAHD) held a meeting on January 18, 2022, with the Los Angeles Homeless Services Authority (LAHSA) and the Housing Authority of the City of Los Angeles (HACLA) to discuss lease up for new rental housing. The discussion focused on addressing the needs of the qualifying populations as stated by HUD HOME-ARP guidelines and ensuring that tenant requirements for other leveraged funding sources would be met. Specifically, the state of California’s Project Homekey Program provided Los Angeles with funds to create new rental housing for chronically homeless and those at risk of homelessness. Given the overlap of tenant requirements, HACLA

suggested that LAHD leverage Project Homekey funds with HOME-ARP funds.

Additionally, LAHD has held consistent meetings with HACLA to discuss acquisition, due diligence, and strategy for the Project Homekey sites to ensure that federal, state and local requirements are addressed. These meetings started in March 2021, upon award of State funding, and will continue until the Project Homekey program is completed, which is projected to be in June 2023.

Table 1.B lists the Continuum of Care and Public Housing Authority organizations.

Table 1.B - Continuum of Care and Public Housing Authority Organizations			
Housing Authority of the City of Los Angeles (HACLA)	Public agency that addresses the needs of all qualifying populations (QPs 1-4)	Virtual meeting on 1/18/22	HACLA is a partner on the implementation of Project Homekey, which will be partially supported by HOME-ARP funds. Additional details are stated above.
Los Angeles Homeless Services Authority (LAHSA)	Continuum of Care; Public agency that addresses the needs of all qualifying populations (QPs 1-4)	Virtual meeting on 1/18/22	The feedback from the CoC confirmed that the City’s proposed HOME-ARP uses are in line with the needs identified by the CoC. Additional details are stated above.

Supplemental Consultations

Three (3) supplemental consultations took place on November 15, 17 and 18, 2022. These virtual consultations focused on soliciting additional feedback from domestic violence service providers, civil rights groups, organizations focused on serving individuals with a disability, veterans' groups and other homeless service providers throughout the region. Table 1.C includes a list of organizations and the type of organization that were in attendance. In these supplemental consultation meetings, the provider community recommends looking into increasing the number of units with increased funding for all qualified populations (QPs 1-4). Overall feedback also suggested that wraparound services should be included for all of the proposed two (2) activities that will be covered by HOME-ARP.

Table 1.C – Organizations Consulted in Supplemental Meetings

Organization	Type of Agency/Org	Method of Consultation	Feedback
Rainbow Services LTD	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Coalition to Abolish Slavery & Trafficking	Private agency - Human Trafficking service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Downtown Women's Center	Private agency - Homeless service providers (QP1)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Jewish Family Service of L.A.	Private agency - Addressing fair housing, civil rights of all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Homeless Outreach Program Integrated Care System (HOPICS)	Private agency - Homeless service providers (QP1)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Housing Rights Center	Private agency - Addressing fair housing, civil rights of all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.

Table 1.C – Organizations Consulted in Supplemental Meetings

Organization	Type of Agency/Org	Method of Consultation	Feedback
CIFD	Public agencies - Address the needs of the all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Haven Hills, Inc.	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Jenesse Center	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Center for the Pacific Asian Family (CPAF)	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Good Shepherd Center	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Equality California	Private agency - Addressing fair housing, civil rights of all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.

Table 1.C – Organizations Consulted in Supplemental Meetings

Organization	Type of Agency/Org	Method of Consultation	Feedback
The People Concern	Private agency - Homeless service provider that also provides domestic violence victim services (QP1 & QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
The Strategy Center	Private agency - Addressing fair housing, civil rights of all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
People Assisting the Homeless (PATH)	Private agency - Homeless service providers (QP1)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
HACLA	Public agencies - Address the needs of the all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Communities Actively Living Independent & Free (CALIF)	Private agency - Addressing the needs of persons with disabilities from all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Catholic Charities	Private agency - Homeless service provider that also provides domestic violence victim services (QP1& QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.

Table 1.C – Organizations Consulted in Supplemental Meetings

Organization	Type of Agency/Org	Method of Consultation	Feedback
Southern California Alcohol and Drug Programs, Inc. (SCADP)	Private agency - Domestic violence service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Independent Living Center of Southern California (ILCSC)	Private agency - Addressing the needs of persons with disabilities from all qualifying populations (QPs1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Coalition to Abolish Slavery & Trafficking (CAST)	Private agency - Human Trafficking service providers (QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Fair Housing Council of the San Fernando Valley	Private agency - Addressing the needs of persons with disabilities from all qualifying populations (QPs 1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
St. Joseph Center	Private agency - Homeless service providers (QP1)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.
Disability Community Resource Center	Private agency - Addressing the needs of persons with disabilities from all qualifying populations (QPs1-4)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.

Table 1.C – Organizations Consulted in Supplemental Meetings

Organization	Type of Agency/Org	Method of Consultation	Feedback
Volunteers of America	Private agency - Homeless service provider that also provides domestic violence victim services (QP1 & QP3)	Virtual meeting on Nov 15, 17 & 18, 2022	Provider community recommends looking into increasing the number of units with increased funding; and suggests that wraparound services should be included.

PUBLIC PARTICIPATION

The City provided opportunities for public participation through public hearings where the public may comment on the proposed HOME-ARP allocation plan. In these public hearings, the City made available the following information: (a) the amount of HOME-ARP funds that will be received and (b) the range of activities that the City may undertake. Opportunities were provided for the public to provide comment on HOME-ARP as follows:

- October 19, 2021 - October 20, 2021 (virtual public meetings);
- January 12, 2022 - January 28, 2022 (public comment period);
- February 22, 2022 (public hearing via Ad Hoc COVID City Council Committee Meeting; Noticed by LA City Clerk);
- December 15, 2022 - January 3, 2023 (public comment period)

Two virtual public participation meetings were held on October 19 and 20, 2021 to obtain public input on the HOME-ARP allocation plan. The proposed uses discussed were Project Homekey, the Affordable Housing Managed Pipeline, and the Eviction Defense Program. These programs fall into the rental housing and supportive services categories of the HOME-ARP regulations. Sixty-seven (67) members of the public attended these meetings. The invitation to the meetings was available in English and Spanish, and included instruction on how to connect via Telecommunication Relay Services. Both meetings included live interpretation in Spanish to accommodate residents with limited English proficiency, with other languages available for translation, but not requested. Following the meetings, accessible versions of the meeting presentation in English and the questions and answers in English and Spanish were posted to the City's Consolidated Plan website, along with an invitation to submit emailed comments.

The City issued a summary of the proposed uses for the HOME-ARP grant as a notice of a proposed substantial amendment to its 2021-22 Annual Action Plan. An accessible version of this notice was posted to the Los Angeles Housing Department's website and sent to approximately 25,000 email list subscribers on January 12, 2022. The public comment period extended through January 28, 2022. The City received five feedback emails from the public, which are included as **Attachment A**. The amendment is posted at the following URL: <https://housing.lacity.org/wp-content/uploads/2022/01/Substantial-Amendment-47-03.pdf>

Following significant revisions to the proposed allocation plan, an updated substantial amendment notice was issued. An accessible version of this notice was posted to the Community Investment for Families Department (CIFD) website and sent to approximately 25,000 email list subscribers on December 15, 2022. The public comment period extended through January 3, 2023. No feedback was received from the public. The amendment is posted at the following URL: <https://communityinvestmentforfamilies.org/consolidated-plan-changes-plans>.

Additional public hearings were held on these dates:

- February 22, 2022 (City Council Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment)
- March 9, 2022 (City Council Housing Committee)
- March 30, 2022 (City Council)

At these meetings, members of the City Council reviewed the proposed HOME-ARP funding allocations. The City Clerk provided Communication Access Real-Time Translation (CART) at live City Council meetings, and the CART transcript was made available on the City Clerk's website following the meetings. The City Clerk also provided instruction on how to request reasonable modifications or accommodations for individuals with disabilities, including instruction on how to use Telecommunication Relay Services for the hearing impaired.

Copies of all public notices for the public hearings conducted on October 19, 2021, October 20, 2021, February 22, 2022 and the substantial amendments posted on January 12, 2022, and December 15, 2022, are included as **Attachment B**.

Describe efforts to broaden public participation:

The City of Los Angeles exceeded the minimum number of required public meetings and provided additional opportunities for public comment periods as required to ensure the public was provided adequate time and resources to fully participate and be involved in this planning process.

The invitations to the meetings were available in two languages (English and Spanish) and included instruction on how to connect via Telecommunication Relay Services. Additionally, all meetings included live interpretation in Spanish. Following the meetings, accessible versions of the meeting presentation in English and the questions and answers in English and Spanish, were posted to the City's Consolidated Plan website, with the invitation to submit emailed comments.

The public hearings held during City Council meetings were provided with Communication Access Real-Time Translation (CART) at live City Council meetings, and the CART transcript was made available on the City's website following the meetings. The City also provided instruction on how to request reasonable modifications or accommodations for individuals with disabilities, including instruction on how to use Telecommunication Relay Services for the hearing impaired.

All public notices including amendments were posted online and distributed to approximately 25,000 email subscribers from a list of departmental contacts ranging from service providers to developers.

Summary of the comments and recommendations received through the public participation process

The public asked questions about proposed uses of HOME-ARP funds for rental housing, concerning housing production through the Affordable Housing Managed Pipeline and Project Homekey programs. These questions addressed the following: the cost per housing unit, how the Project Homekey housing units will be transferred to nonprofit operators, how residents could locate affordable housing, how the income-restricted affordable units are monitored by the Los Angeles Housing Department, and strategies to promote investment with the community in affordable housing development. A commenter proposed that community-owned affordable housing be developed at specific sites. No questions were submitted on the Eviction Defense Program supportive services. There were two comments that were more geared towards homelessness in general: adding protections for landlords to the eviction defense program and expressing support for funding and expanding domestic violence shelters and services for women.

Comments or recommendations not accepted and state the reasons why

Two comments were against the proposed uses of HOME-ARP in the proposed allocation plan; however, these comments indicated more of an issue with programs to support the homeless in general, and not substantive feedback on how to change the allocation plan. All other comments were accepted and those that could be integrated into the program designs were integrated.

NEEDS ASSESSMENT AND GAPS ANALYSIS

The needs assessment and gap analysis presented in this section evaluates the 1) size and demographic composition of HOME-ARP qualifying populations within the City’s jurisdiction, and 2) unmet needs of HOME-ARP qualifying populations. In addition, the needs assessment and gap analysis identifies any gaps within its current shelter and housing inventory, and service delivery system. This needs assessment and gap analysis focuses on:

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

This section also identifies and considers the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance (TBRA), and affordable and permanent supportive rental housing.

Housing Inventory in Los Angeles

The Housing Inventory Count (HIC) for the City provides useful context on what is currently in place in terms of units/beds available to the homeless population at a given time. When taken into consideration with the size and demographic composition of the qualifying population described below in detail, it provides a better understanding of the existing needs and gaps discussed in the subsections below. It should be noted that the City subdivides the inventory available for the homeless population into various categories based on the type of shelter or permanent housing it provides: Emergency Shelter, Transitional Housing (which includes both traditional and the City’s Safe Haven program), Permanent Supportive Housing, and Other permanent housing. Table 2 below provides data on the number of beds or units currently available under each of these types of housing.

TABLE 2. INVENTORY FOR THE HOMELESS (BEDS & UNITS)						
Type of Housing	Family HH (at least 1 child)		Adults Only (w/o child)		Vets	Victims of Domestic Violence (DV)
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds
Emergency Shelter	8,506	2,821	11,581	11,581	112	162
Transitional Housing	1,623	532	2,521	2,521	813	218
Safe Haven	0	0	285	285	260	0
Permanent Supportive Housing	5,983	1,906	17,910	17,910	6,430	0
Other Permanent Housing	906	276	1,782	1,782	0	0
Total	17,018	5,535	34,079	34,079	7,615	380

Sources: (1) 2020 City of Los Angeles Point-in-Time Count (PIT),
(2) 2021 Los Angeles Continuum of Care Housing Inventory Count (HIC)

Notes on data: (a) HUD requires number of beds and number units for households without children to match.

(b) No. of beds for victims of domestic violence is a percentage of the overall count encompassing the Greater Los Angeles Area based on historical context that generally 40% of the population reported in the HIC reside in the city proper.

Size and demographic composition of qualifying populations within the City’s boundaries

HUD has identified the categories below as Qualifying Populations (QP) for HOME-ARP funding:

1. Homeless, as defined in 24 CFR 91.5 (QP1)
2. At Risk of Homelessness, as defined in 24 CFR 91.5 (QP2);
3. Persons fleeing or attempting to flee, domestic violence, dating violence, sexual assault or stalking as all of these terms are as defined in 24 CFR 5.2003 or human trafficking as outlined in the Trafficking Victims Protection Act of 2000, as amended (QP3); and,
4. Other Populations where providing supportive services or assistance would prevent the family’s homelessness or would serve those with greatest risk of housing instability (QP4).

Homeless Population (QP1)

In accordance with the 2020 point in time count for the homeless population, Los Angeles County was up 13% to 66,436 people experiencing homelessness. Of that number, the City of Los Angeles was up 14%, at 41,290 persons experiencing homelessness (see Table 3, below). The City of Los Angeles represents 62% of the homeless population within Los Angeles County and is amongst one of the highest concentrations of the homeless populations in the country.

TABLE 3. HOMELESS POPULATION					
	Persons in a Family	Individuals (those not in family units)	Grand Total Homeless Persons	<i>Select Subsets of the Total (includes both individuals and families)</i>	
				<i>Vets</i>	<i>Victims of DV</i>
Sheltered Homeless	6,693	5,745	12,438	314	2,554
Unsheltered Homeless	1,615	27,237	28,852	1,806	11,809
Total	8,308	32,982	41,290	2,120	14,363

Data sources utilized:

(1) 2020 City of Los Angeles Point-in-Time Count (PIT),

- Approximately 80% (32,982) of people experiencing homelessness were single individuals.
 - This number includes Transitional Age Youth who are 18-24 (2,083) and Unaccompanied Minors under 18 (17). In the County, this represented a 19% increase from the numbers documented in 2019.
 - Among the whole of the individual homeless population, approximately 48% (15,747) experienced homelessness for over a year (and are considered chronically homeless) and the remaining 52% (17,235) experienced homelessness for less than a year.
- In the County, the number of families experiencing homelessness increased by 45.7% from 2019.
 - For those in families in the City, persons under 18 make up 52% of the population (4,339).
- Black/African American individuals represented a disproportionately high percentage of the overall homeless population at 38% (15,622) as compared to their total representation of city residents at only 9% of the total population – an indication of the impacts of continued structural racism.
 - Those identified as Hispanic/Latino made up 33% (13,424).

- White-identified homeless individuals represented 25% (10,293) of the homeless population enumerated above.
- Native American-identified individuals made up 1% (430) of the homeless population quantified in Los Angeles.
- Asian-identified individuals made up 1% (502) of the homeless population quantified in Los Angeles.
- Those identified as multi-racial made up the remaining 2% (943) of the population.
- For gender representation in the count, males make up the majority of people among the homeless population at 67% (27,790), females made up 32% (13,330); and transgender persons made up 2% (666).
- 10% (4,133) of the overall population reported a sexual orientation that is gay, lesbian, bisexual, or nonconforming.
- 57% (23,479) of the homeless population is between the ages of 25-54. The second most prevalent age group were persons between the ages of 55-61, at 14% (5,898) of the total population. Youth below the age of 18 years old make up the third most prevalent group at 12% (4,923). The fourth most prevalent age group were persons ages 62 and over, at 10% (4,080) – this latter population saw a 20% increase from the homeless population documented in 2019 at the County level.
- Unsheltered veterans outnumber their sheltered counterparts by nearly six times (1,806 vs. 314).
- Veterans who are individuals greatly outnumber those who are in a family (2,110 vs. 10).
- 28% (10,357) of the homeless population in the City of Los Angeles have a substance-use disorder (a number that doubled from 2019 at the County level, due to more specificity in the survey question), and 25% (9,123) of the population has a serious mental illness.

At-Risk of Homelessness (QP2)

According to the 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, an estimated 28% of the City's renters, or 244,015 households, are extremely low-income renters at risk of homelessness as defined by 24 CFR 91.5 due to annual earnings of 30% or less of the area median income (AMI).

- Latinos represent the largest ethnic group of renters in the city with 41% (100,046) of households;
- White households make up 32% (78,085)
- Black/African American households represent 13% (31,722),
- Asian households represent 12% (29,281)

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (QP3)

- According to Table 3 above, there are a total of 11,809 victims of domestic violence that are unsheltered. 82% (9,641) of the unsheltered victims experienced domestic violence in their lifetime and 18% (2,168) were homeless because they fled domestic violence.
- As for the sheltered homeless victims of domestic violence, the City accounted for 2,554 victims of domestic violence as indicated in Table 3 where 78% (1,981) of the victims experienced domestic violence in their lifetime and 22% (573) were homeless because they fled domestic violence.

In addition to the data from 2020 referenced in Table 3 above, CIFD tracked the following data for the period between July 1, 2021 and May 31, 2022:

- A total of 36,822 calls have been made to the hotline
 - 14,856 calls to the DV Hotline

- 12,700 calls to Crisis-to-Shelter
- 9,076 calls to LAPD
- 190 calls to the Restraining Order Clinic
- Of the 14,856 calls made to the DV hotline, 8,994 were from survivors or people calling on behalf of the survivors that were fleeing or attempting to flee violence
- Of the 8,994 survivors fleeing or attempting to flee violence, 6,278 were seeking immediate shelter
- Of the 6,278 survivors seeking shelter, 457 survivors were accepted into a shelter, and the remaining 5,821 were unable to find shelter through our system because of a lack of space
- Demographic information for this qualifying population is confidential

Other Population (QP4)

Other populations, as defined by HOME-ARP, includes individuals and households that “where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.” Additional determinations include the following:

1. Other Households Requiring Services or Housing Assistance to Prevent Homelessness
2. Those who have incomes below 30% AMI and are experiencing severe housing cost burden

Other Households Requiring Services or Housing Assistance to Prevent Homelessness

Per HUD Notice 21-10, this other population is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed. Those in this population need additional housing assistance or supportive services to avoid a return to homelessness. For the City, these may be the individuals and/or households currently enrolled in the Crisis/Bridge Programs, Emergency Shelter programs and Time Limited Subsidies which includes Rapid Rehousing (RRH) & Recovery Rehousing (RRP). The aforementioned programs cater to individuals and/or families who qualify for immediate, temporary housing. These programs range from 30 days to two years with varying levels of case management. These programs also serve to divert people from falling more deeply into homelessness, by bringing them indoors immediately. According to the Los Angeles Homeless Services Authority (LAHSA), there are currently 4,981 individuals and/or households who are currently enrolled in the Crisis/Bridge & Emergency Shelter programs within the City of Los Angeles. The data was extracted from the clients actively enrolled during June 2022:

- The majority of these clients, 46% (2,287) are between the ages of 25-44 years old. The second most prevalent age group in this subpopulation are aged between 0-24 years old, at 28% (1,402) of the population, followed by 26% (1,284) who are aged between 45- above.
- 67% are families, 31% are individuals and 2% are youth.
- Black/African American represented a disproportionately high 42% (2,102); and those identified as White made up the second highest at 29% (1,436). The total number of Native American, Asian, Native Hawaiian and Multi-Racial clients made up 5% (224) of the population quantified in Los Angeles and the ones who identified themselves as “other” in the race category, makes up the balance of 24% (1,219).
- For gender representation in this count, females make up an overwhelming majority of people enrolled in these programs at 50% (2,486), males make up 35% (1,723); and transgender persons make up 1% (32). The remainder 15% (740) of the population reported a gender other than singularly female or male.

As for the Time Limited Subsidies (TLS) inclusive of – RRH & RRP, according to LAHSA there were a total of 28,109 enrollees between these two programs within a two-year time frame (July 1, 2020 – June 30, 2022).

- 83% (23,230) of the total enrollees are enrolled in RRH and 17% (4,879) are currently enrolled in the RRP programs within the City of Los Angeles.
- Of the 23,230 in Rapid Rehousing, there were only 872 enrollees that exceeded 24 months of rental assistance.
- Clients in Rapid Rehousing or Recovery Rehousing are intended to be fairly stable mentally and physically. The purpose of RRH and RRP is to place clients who are less likely to need significant subsidy in the future after their two years in either RRH or RRP.

Those At Greatest Risk of Housing Instability – Households with incomes < 30% AMI and are experiencing severe housing cost burden

The City of Los Angeles identifies this population as any household that currently rents with an annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden: are paying more than 50% of monthly household income toward rental housing costs. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities).

Over half (55%) of the households in the city of Los Angeles are considered lower-income (meaning they have incomes below 80% of the area median) and 23% are considered Extremely Low-Income (meaning they have incomes below 30% of area median). Not surprisingly, low-income people have the highest rates of housing insecurity and over 68% of Extremely Low-Income households spend more than half of their income on rent.

According to the 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, 168,415 households, out of the 244,015 that are At-Risk of Homelessness, are currently experiencing a cost burden of >50%. This breakdown is further discussed in Table 5 below, see section under “Gaps within the current shelter and housing inventory as well as the service delivery system.”

Unmet housing and service needs of qualifying populations

Homeless Population (QP1)

Bed or unit amounts for the homeless population (QP1) do not surpass the number of people in this population in need, in other words, there is a gap between the number of people in need and resources available.

At-Risk of Homelessness (QP2)

244,015 households are extremely low-income renters at risk of homelessness (QP2) and the City lacks resources to build the number of affordable units at this time.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (QP 3)

Bed or unit amounts for this qualifying population, QP3, do not surpass the number of people in need under this population, in other words, there is a gap between the number of people in need and resources available.

And finally, various interim housing programs have roughly 33,090 enrolled without stable exit plans. Based on the information gathered through the public participation process, the multiple consultations, and the gaps analysis, it is

clear there are both unmet rental housing and service needs for all QPs.

More specifically, the greatest unmet housing needs of all qualifying populations in the City of Los Angeles, includes:

- Rental housing that is affordable to qualifying and other populations (i.e., rent does not exceed 30% of their monthly household income); and
- Permanent supportive rental housing that coordinates specialized services and rental subsidy with housing that is affordable to qualifying and other populations.

The greatest unmet service needs within the City for the qualifying populations include:

- Costs of improving knowledge and basic educational skills
- Costs of establishing and/or operating employment assistance and job training programs
- Costs of providing meals or groceries
- Costs of assisting eligible program participants to locate, obtain and retain housing
- Costs of eviction support legal services
- Costs of teaching critical life management skills

Current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, Tenant-Based Rental Assistance (TBRA), and affordable and permanent supportive rental housing:

The City of Los Angeles works through various City-specific departments (e.g., Los Angeles Housing Department) as well as related governmental agencies (e.g., Housing Authority of the City of Los Angeles) to provide various resources to assist qualifying populations with shelter, supportive services and permanent, rental housing needs. In recent years, the City of Los Angeles has worked to increase its stock and capacity to provide non-permanent/shelter beds and permanent, affordable housing.

Current available housing resources for qualifying populations include:

1. Congregate beds and non-congregate shelter units;
2. Supportive services;
3. Tenant-based rental assistance; and
4. Affordable and Permanent Supportive Rental Housing

Homeless Population (QP1)

Shelter Beds

In response to the COVID-19 pandemic, non-congregate shelter beds were provided via City hotels and motels for clients that were especially vulnerable to COVID-19. The City of Los Angeles provided non-congregate sheltering through Project Roomkey; 1,118 units have been provided. So-called “Tiny Home Villages” were also created, providing 1,557 beds across the City to help vulnerable populations maintain a healthy distance in order to stop the spread of the virus.

The City of Los Angeles also funds a Winter Shelter program that provides 264 beds per night for five months out of the year (November through March). Safe Havens serve as refuge for people who are homeless and have a serious mental illness; 285 beds are provided throughout the Continuum of Care. Beds are also provided via an effort called A

Bridge Home: 1,941 beds located Citywide (some to specific target populations such as Transitional Age Youth, women, and families). Not included in Table 2 above, the Safe Sleep programs provides 105 Citywide safe spaces for persons experiencing homelessness.

Specialized beds (partially county and state funded) represent another resource available to Angelenos in health crisis situations that, when mitigated, can create a need for affordable, independent, permanent housing. These include Crisis Residential Treatment Beds, Adult Psychiatric Urgent Care Centers, Adult Residential Treatment Beds, Subacute/Institutions for Mental Diseases, Substance Use Beds, Recovery Oriented Housing, Residential Treatment, Recuperative Care.

Supportive Services & Tenant-based Rental Assistance

The Tenant-Based Supportive Housing (TBSH) program provides affordable, permanent, supportive housing for high-service-need chronically homeless individuals and families by providing rental subsidies and supportive services through the collaborative effort of HACLA and the L.A. County Departments of Mental Health and Health Services. The intensive supportive services enable chronically homeless individuals and families to stabilize their living conditions and remain successfully housed for the length of time that they are on the program. The TBSH program has an allocation of 800 housing choice vouchers.

Affordable and Permanent Supportive Rental Housing

There are 9,750 supportive housing units located in 175 service-rich housing developments that provide wraparound supportive services for the successful, permanent housing of persons experiencing or at risk of homelessness. Specifically, there are 130 Proposition HHH-funded projects with 8,537 units overall, 7,156 of which are Supportive Housing units. 34 of these developments, with 2,110 units, are currently in service; 68 projects, with 4,279 units are in construction and the rest are anticipated to be in service between Spring 2023 and the end of 2024. Since 2016, the City's long-standing programs, such as the Affordable Housing Managed Pipeline and Affordable Housing Bond Program – which leverage funding sources such as the Affordable Housing and Sustainable Communities program and a dedicated allocation of 9% and 4% tax credits in the City – have collectively financed the creation of 50 projects with 3,776 units overall, 2,309 of which are Supportive Housing units. As an extension to the aforementioned Project Roomkey program, the City is also financing the creation of at least 928 Project Homekey units. The Housing Authority of the City of Los Angeles (HACLA) administers a number of programs for Angelenos with specific, acute needs:

1. The Homeless Program Housing Choice Voucher Program provides permanent affordable housing for homeless individuals and families, while ensuring access to supportive services to maintain independent living. The Homeless Program's allocation of 4,111 housing choice vouchers targets homeless individuals and families living in transitional housing, emergency shelters, and the streets. HACLA currently works with 19 nonprofit and public agency partners located throughout the City of Los Angeles.
2. The Permanent Supportive Housing Project Based Voucher (PBV) Program provides long-term rental subsidy contracts that facilitate development of housing for homeless and chronically homeless individuals and families, targeting a variety of special needs populations such as seniors, families, transitional age youth, veterans and individuals with disabilities. Program partners provide on-site supportive services. Under federal regulations, a public housing authority may choose to provide Section 8 PBV rental assistance for up to 20% of its units under the Housing Choice Voucher Program and an additional 10% of units can be used to house the homeless. The Housing Authority selects projects for PBV through a competitive Notice of Funding Availability issued jointly with the then-Housing + Community Investment Department of the City of Los Angeles (now Los Angeles Housing Department) and the Los Angeles County Health Department as the Permanent Supportive Housing Program (PSHP). HACLA currently has 169 PSHP PBV projects online or in development, consisting of 7,449 units.
3. The Veterans Affairs Supportive Housing program (HUD-VASH) is a partnership that was developed by HUD and the Veterans Administration (VA) to provide permanent housing and supportive services to homeless and chronically homeless veterans. HACLA partners with the West L.A. Veterans Affairs Medical Center. The

HUD-VASH goal is to combine Section 8 rental assistance vouchers with case management and clinical services provided by the VA at its medical centers to enable homeless and chronically homeless veterans and their families to reintegrate in the community, remain in stable housing, and lead healthy, productive lives. In the fourth quarter of 2018, HACLA was awarded 340 new HUD-VASH vouchers, bringing the City's total allocation of these units focused on housing homeless and chronically homeless veterans to 4,615.

4. The Homeless Veterans Initiative, S8, increased the Waiting List Limited Preference for Homeless by 500 vouchers to support the Homeless Veterans Initiative, which targets homeless veterans who are not VA healthcare eligible, a population that had not been assisted. HACLA's nonprofit and public agency partners provide supportive services that enable veterans to maintain independent living and remain successfully housed.
5. The Continuum of Care Program, formerly called the Shelter Plus Care Program, was created under the McKinney Homeless Assistance Act and is designed to provide permanent housing with supportive services to chronically homeless persons with disabilities. Grants awarded require a supportive services match from the program partner. The grants provide for a variety of rental housing components: Tenant-Based, Sponsor-Based and Project-Based assistance. The targeted disabilities for the program are mental illness, substance abuse, or HIV/AIDS. HACLA has participated in the Continuum of Care (Shelter Plus Care) program since 1992 and has a current allocation of 4,320 units with 22 partner agencies.
6. The legacy Moderate Rehabilitation Single Room Occupancy (SRO) Program was created under the Stewart B. McKinney Homeless Assistance Act of 1987. The Section 8 rental assistance provided under this program is designed to bring more SRO units into the local housing supply to assist homeless persons into permanent housing. HUD's strategy is to convert existing housing, a rundown hotel, or even an abandoned building into safe and decent housing. The rental subsidy in the Moderate Rehabilitation SRO Program is attached to the building or unit as Project-Based rental assistance. HACLA currently has an allocation of 974 SRO Moderate Rehabilitation units with five nonprofit developers.

At-Risk of Homelessness & Other Populations (QP 2 and QP 4)

In an effort to keep individuals and families housed, the Los Angeles Housing Department implemented a series of rental assistance programs to assist the Angelenos whose household incomes are at 30% AMI or below.

Tenant-based rental assistance

The Emergency Housing Voucher program administered by HACLA was awarded 3,365 Emergency Housing Vouchers by HUD, authorized by the American Rescue Plan (ARP) Act of 2021 (Public Law No. 117-2). These vouchers are to assist individuals and families who are experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability. HACLA receives referrals for the program from the Los Angeles Homeless Services Authority (LAHSA) as prioritized by the Coordinated Entry System (CES). It is likely that most people referred for this resource are already connected to CES and will be provided housing support services.

The Emergency Renters Assistance Program & Emergency Rental Assistance Subsidy Program is a program developed by the City of Los Angeles, in partnership with the State of California and the federal government, to assist residential renters who have been unable to pay their rent as a result of the COVID-19 pandemic.

The City is working to provide housing options for renters that pay over 30% of their income for housing costs, including renters that pay over half their take-home income for housing costs. To further illustrate this need for affordable, rental housing, the City of Los Angeles became an Option A jurisdiction with the California Department of Housing and Community Development for the state "Housing is Key" rental assistance program in September 2021 to implement the second phase of the Emergency Rental Assistance Program (ERAP).

- The 2020 Emergency Rental Assistance Subsidy Program (ERAS) assisted 49,133 households and distributed

\$98.3 million

- The 2021 Emergency Renters Assistance Program (ERAP Part 1) assisted 17,992 households and distributed \$221 million
- The State of California’s “Housing is Key” Program (ERAP Part 2) assisted 51,432 households and distributed \$629.6 million

These rental assistance programs kept families throughout Los Angeles housed. However, funds are finite and many households will continue to owe rent. Rental arrears continue to exist based on the fact that a number of applications remain pending as received by the California Department of Housing and Community Development for the state “Housing is Key” rental assistance program through February 15, 2022.

Rapid Re-Housing programs assist individuals, youth, and families living on the streets or in emergency shelters to solve the practical and immediate challenges of obtaining permanent housing while reducing the amount of time they experience homelessness, avoiding a near-term return to homelessness, and linking to community resources that enable them to achieve housing stability in the long-term. Housing Identification Assistance; Financial Assistance—time-limited rent and move-in assistance; and Case Management & Supportive Services are all included in the Rapid Rehousing Program.

The City adopted the COVID-19 **Emergency Eviction Defense Program (EDP)** in September 2020. This EDP framework reflects the previous work done based on the November 2019 Eviction Defense Program and other eviction prevention programs the City has established since 2018. The EDP was created to respond to the urgent threat of evictions for the thousands of Angeleno renters impacted by the COVID-19 pandemic. EDP was designed to promote housing stability by offering services to assist City of LA tenants. The program includes outreach and education, pre-emption services, legal defense to those facing evictions, case management and rental assistance to ensure housing stability, and evaluation and monitoring of service delivery for future program enhancements.

The City of LA contracted with the Legal Aid Foundation Los Angeles (LAFLA) to provide comprehensive eviction prevention services. The framework of these services include the following key components:

- **Education and Public Awareness (Landlords and Tenants)**
 - Multilingual “Know Your Rights” workshops, outreach and education via the Stay Housed LA webpage at: <https://www.stayhousedla.org/>
 - Targeted education to landlords, particularly small operators that may require more direct assistance from the City to prevent the issuance of illegal Unlawful Detainers (UDs) and three-day notices
 - Outreach efforts
 - Identification of landlords that continually engage in illegal practices and proactively conduct outreach to tenants living in at-risk buildings
- **Eviction Prevention Interventions (Landlords and Tenants)**
 - Tenants with an eviction or anticipate a three-day notice will be able to access services and/or referrals at a variety of entry points including LAHD offices, the LAHD hotline, the office of legal service providers/community organizations, and through designated tenant clinics
 - Serve 80% AMI or below – income requirement to receive services
 - Assistance filing and monitoring complaints (Rent Stabilization Ordinance (RSO), code enforcement, and fair housing); legal assistance negotiating agreements with a landlord
 - Assistance responding to a three-day notice, unlawful detainer, etc.
 - Tenant Stability Planning – including financial coaching (administered by the FamilySource Centers); and
 - Emergency or ongoing rental assistance
- **Emergency Legal Assistance**
 - Limited legal services may be provided within clinics, via hotlines, or by direct appointments at <https://www.stayhousedla.org/>. The services include assistance completing COVID-related declarations,

submitting a formal response to a notice of termination of tenancy, formal response to a UD, and requests for reasonable accommodations.

- Income eligible tenants who have been served with a UD would be able to access full-scope legal representation. Legal service attorneys would represent impacted tenants throughout the pre-eviction and eviction process in settlement negotiations through trial, if necessary. Tenants living in subsidized housing would also have access to full-scope legal representation for other cases such as administrative hearings. You can get legal help at: <https://www.stayhousedla.org/referral>.
- **Rental Assistance**
 - Emergency rental assistance that is needed to prevent or resolve an eviction, will be administered by the legal service providers and consist of a negotiated one-time payment to pause or stop the eviction process
 - Rental assistance is defined as: funding to cover the whole or part of the cost of rental arrears and regular rental payments for a time-limited period, which must be paid directly to the landlord, not the tenant
 - Tenants will be eligible for rental assistance at any stage of the eviction process (i.e., before a notice, after a notice, and after a UD).
- **Ongoing Support Services for Tenant Stability**
 - Eight of the City's FamilySource Centers provide a myriad of ongoing services to ensure tenant stability, which include but are not limited to the following: case management services (including financial coaching) with the legal service provision, ongoing rental assistance (for up to three months), and supportive services.

Supportive Services

With respect to supportive services, there are multiple supportive services that the City is currently offering to the qualifying populations as defined by HOME-ARP regulations, whether directly or in partnership with other City departments or other government agencies.

The low-income families that access the City's FamilySource system of service centers might be referred to the Solid Ground Homeless Prevention Program, which focuses on preventing new cases of homelessness and rapidly stabilizing households in their current permanent housing, or assisting them to secure other rent-reasonable permanent housing. Services include case management, landlord mediation/resolution, financial coaching, housing location services, and direct financial assistance. The Solid Ground Homelessness Prevention Program will serve at least 300 families.

Resources accessed through the Los Angeles Department of Water and Power (LADWP) connect households to the California Arrearage Payment Program that provides clients with assistance in paying for utilities. Similarly, the California Water and Wastewater Arrearage Payment Program provides Angelenos with assistance in paying these specific outstanding costs. Likewise, the Low Income Home Energy Assistance Program and Low Income Household Water Assistance Program are also resources, supportive services that help precariously-housed families avert homelessness with assistance to meet household obligations. Angelenos can access information for the application process via the LADWP website.

The Problem-Solving Program (formerly Diversion) is a short-term housing intervention that seeks to assist participants by identifying immediate and safe housing alternatives either independently or within their own network of family, friends and social support. This is in an effort to help individuals avoid further engagement with the homeless services system.

Problem-solving programs exist throughout the City. Most notably, these services are offered at select FamilySource Centers. At these centers, staff engage with families that are reporting to be homeless or are at risk of becoming homeless. They will identify existing support systems and discuss alternative solutions for rapid resolution of their housing crisis. The staff are trained in problem-solving interventions and can assist the families in accessing short-term financial assistance for a rapid resolution of the client's needs. If the specialist is unable to identify a Problem-Solving outcome, they will provide connections to homeless service agencies.

Fleeing or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (QP 3)

Congregate and non-congregate shelter units

The City of Los Angeles also funds the provision of a limited number of congregate housing options. The City finances a network of shelters that include temporary housing for those fleeing domestic violence or human trafficking, providing two types of shelter: Emergency Shelter for 30-45 days and transitional shelter for 9-24 months.

The City of Los Angeles also contracts with two agencies to provide immediate non-congregate shelter in the Crisis-to-Shelter program.

Supportive Services

The City of Los Angeles funds supportive services through all the housing programs to ensure that survivors can address any immediate needs, gain new skills, and have the support they need to transition to a safe, permanent home. However, supportive services are only available to survivors residing in a domestic violence or human trafficking shelter, or actively participating in the Survivors First Program.

Tenant-based Rental Assistance

The Survivors First Program for survivors of domestic violence and human trafficking provides funding support to help a survivor and their family maintain or obtain permanent housing. The program will serve up to 400 households or 1000 individuals through this program.

Gaps within the current shelter and housing inventory as well as the service delivery system

The City of Los Angeles faces deep deficits related to both permanent and interim housing solutions for the range of populations discussed above. The need for shelter and permanent housing units far outpaces the ability to add to the stock and the sheer number of households and individuals that qualify for affordable and/or subsidized housing.

Homeless Population (QP1)

Tables 4 and 5 on the next two pages calculate the gaps for the homeless population by utilizing the housing inventory in Table 2 and the Homeless Population in Table 3. The gaps identified in Table 4 calculate the difference between the homeless population and the temporary housing that is available within the City. As mentioned in the beginning of this section, temporary housing in this application includes emergency shelters, transitional housing, and Safe Haven housing. The gaps identified in Table 5 calculate the difference between the homeless population and the permanent supportive housing that is available within the City.

Because Permanent Supportive Housing is represented as a unit count, and not a bed count, for the number of persons in a family, the assumption is that the average household size is 3 persons. This was utilized to calculate the actual gap for the number of units needed for permanent supportive housing compared to the number of persons in a family represented in Table 3. In other words, in Table 5, the total number of persons in families – 8,308 – was divided by 3 to represent the actual number of households, so that a rough translation could be calculated for the number of units required for this population.

TABLE 4. GAPS ANALYSIS FOR HOMELESS POPULATION VS TEMPORARY HOUSING

TABLE 4. GAPS ANALYSIS FOR HOMELESS POPULATION VS TEMPORARY HOUSING												
	Current Inventory for Temporary Housing				Homeless Population				Gap Analysis			
Type of Housing	Family HH (at least 1 child)	Adult HH w/o child	Vets	Victims of DV	Family (# of persons)	Individuals	Vets	Victims of DV	Family HH (at least 1 child)	Adult HH w/o child	Vets	Victims of DV
	# of Beds	# of Beds	# of Beds	# of Beds					# of Beds	# of Beds	# of Beds	# of Beds
Emergency Shelter	8,506	11,581	112	162								
Transitional Housing	1,623	2,521	813	218								
Safe Haven	0	285	260	0								
Sheltered Homeless					6,693	5,745	314	2,554				
Unsheltered Homeless					1,615	27,237	1,806	11,809				
TOTALS	10,129	14,387	1,185	380	8,308	32,982	2,120	14,363				
<i>Current Gap</i>									1,821	-18,595	-935	-13,983

Data sources utilized:

- (1) 2020 City of Los Angeles Point-in-Time Count (PIT),
- (2) 2021 Los Angeles Continuum of Care Housing Inventory Count (HIC)

TABLE 5. GAPS ANALYSIS FOR HOMELESS POPULATION VS PERMANENT SUPPORTIVE HOUSING												
Type of Housing	Current Inventory				Homeless Population				Gap Analysis			
	Family HH (at least 1 child)	Adult HH w/o child	Vets	Victims of DV	Family (# of persons)	Individuals	Vets	Victims of DV	Family HH (at least 1 child)	Adult HH w/o child	Vets	Victims of DV
	# of Units	# of Units	# of Units	# of Units					# of Units	# of Units	# of Units	# of Units
Permanent Supportive Housing	1,906	17,694	6,430	0								
Other Permanent Housing	276	1,782	0	0								
Sheltered Homeless					6,693	5,745	314	2,554				
Unsheltered Homeless					1,615	27,237	1,806	11,809				
Totals	2,182	19,476	6,430	0	8,308	32,982	2,120	14,363				
<i>Current Gap</i>									-587	-13,506	4,310	-14,363

Data sources utilized:

- (1) 2020 City of Los Angeles Point-in-Time Count (PIT),
- (2) 2021 Los Angeles Continuum of Care Housing Inventory Count (HIC)

As indicated by Table 4 above, the number of beds for temporary housing is not adequate to house the number of persons in this target population. Specifically, there is currently an overwhelming gap or shortage of 18,595 beds for individuals without a child within the City of Los Angeles; that includes the Veterans subset, with a need of at least 953 beds; and the victims of domestic violence subset, with a need of at least 13,983 beds for temporary housing.

As for Table 5 above, the number of units that are available for homeless families with at least one child is not adequate to house these families here in Los Angeles. The data indicates a 587-unit deficit for this particular subpopulation; and the gap for the number of units for individual adults without a child is 13,506, which is exceedingly high. The data in Table 5 also shows that there is a gap of 14,363 units for victims of domestic violence.

With 41,290 people experiencing homelessness in Los Angeles as of 2020, it is clear that solutions for both building permanent housing and connecting populations to the temporary shelters and any available resources are necessary. See “Preferences” section below for a more detailed discussion for these gaps identified for each subpopulation.

At-Risk of Homelessness and Other Populations (QP 2 and QP 4)

While it is important to describe the homeless population’s gap analysis, it is also critical to understand that the City of Los Angeles is decidedly a city of renters with approximately 867,750 rental units representing 63% of the total housing stock. The current rental unit counts are utilized in the table below to demonstrate the gap for the population At-Risk of Homelessness, as well as the other population who are at Greatest Risk of Housing Instability.

Table 6 below indicates the Housing Needs Inventory and Gap Analysis for At-Risk of Homelessness and Greatest Risk of Housing Instability.

TABLE 6. NON-HOMELESS			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Rental Units Affordable to HH at 0-30% Area Median Income (AMI) (At-Risk of Homelessness)	46,363		
Rental Units Affordable to HH at 50% AMI (Other Populations)	55,588		
0%-30% AMI Renter HH not experiencing >50% cost burden (At-Risk of Homelessness)		75,600	(29,237)
0%-30% AMI Renter and is paying more than 50% of monthly household income toward housing costs (Other Populations)		168,415	(112,827)
Total	101,951	244,015	(142,064)

Data sources utilized:

- (1) 2014-2018 Comprehensive Affordable Housing Strategy (CHAS)
- (2) Los Angeles County Annual Affordable Housing Outcomes Report 2021 (<https://chpc.net/resources/los-angeles-county-annual-affordable-housing-outcomes-report-2021/>)

Based on the data in Table 6, there is a total gap of 142,064 units needed for the population that is At-Risk of Homelessness, as renters earning 0-30% AMI. An overwhelming 79% of this gap includes renters that are earning 0%-30% AMI and are paying more than 50% of their income towards housing costs. Specifically, a 112,827-unit deficit exists for this qualified subpopulation.

The shortfall of units is expected to be exacerbated due to the current rise in rents, inflation, and low vacancy rates. According to the most recent Los Angeles Rent Report by Apartment List, market rents increased by more than 16% from March 2021 to March 2022 with the median rent for a one-bedroom unit now at \$1,760. The significant growth in

inflation adds more stress to existing rent-burdened households and the search for new comparable, more affordable rentals is more difficult today. At the end of 2019, the U.S. Census reported a vacancy rate of 4% for the Los Angeles Metropolitan Statistical Area (MSA). Rental vacancies have become prevalent during the COVID-19 pandemic reaching a peak of 5.5% at the start of 2021 but by the end of the year, the vacancy rate declined to 3.3%—demonstrating a more competitive rental housing market than pre-pandemic levels.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (QP 3)

The 2020 Homeless Count for the City of Los Angeles captured a total of 11,809 unsheltered and 2,554 sheltered victims of domestic violence who could benefit from a safe, confidential shelter and supportive services. The City would require an extra 13,983 beds to meet the needs of all the survivors in the City. The 2020 PIT report does not include information on the prevalence of human trafficking.

Additionally, the City would also need a comparable number of services for this qualifying population, including case management, child care, counseling for the children of survivors, court and social services advocacy, education services for children and adults, employment assistance, job training, household establishment assistance, housing search and placement assistance, legal assistance and services, life skills training, medical advocacy, mental health services, and transportation.

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

Conditions that will be included in the definition of “other populations” that are associated with instability and increased risk of homelessness include:

- (1) Other families requiring services or housing assistance to prevent homelessness. This is defined as households who have previously been qualified as homeless as defined in 24 CFR 91.5 who are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or other assistance allowing the household to be housed, and who will need additional housing assistance or supportive services to avoid a return to homelessness; and
- (2) At greatest risk of housing instability. These are households who have annual income that is less than or equal to 30% of the area median income, as determined by HUD, AND are experiencing severe cost burden (is paying more than 50% of monthly household income toward housing costs).

Priority needs for qualifying populations

As identified in the discussion above, the priority needs in the City include permanent, affordable rental housing and supportive services for all qualifying populations. These funds will be used to support new rental housing and supportive services to keep individuals and families housed and stable. There is a 14,093 rental unit deficit for QP1, thus the priority needed for this QP is additional rental housing. There are a total of 142,064 households (and possibly more) that would meet the definition of QP2 and require either services or new rental housing. There is a 14,363-unit deficit of units for QP3, thus, new rental housing or supportive services to pay for rental assistance is a priority. Finally, the several shelter interventions in the City (described in the “Needs and Gaps Analysis” section) have upwards of 20,000 enrollees without determined exits for more permanent/stable housing, thus there is a need for either rental assistance (as a supportive service) or new rental housing. Additionally, given this increased economic instability that has resulted from the pandemic, emergency assistance may be needed not only for rent and utilities but also for meals/groceries, childcare, or car repairs. Covering such emergency costs would not only meet immediate needs but also help renters obtain or maintain employment, preventing further financial distress that could lead to homelessness.

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

The gaps analysis was conducted by evaluating data accessed from LAHSA sources – including summaries from the Homeless Management Information System – a review of CHAS and other HUD/CoC-provided data (HIC), U.S. Census data, as well as a review of other local data as it relates to counts of units financed by local/state resources (e.g., the Homekey program).

The gaps in the shelter and housing inventory were identified by deducting the total number of beds available for each subpopulation from the total number needed as identified in the Point-in-Time Count. LAHD obtained the data from HUD and LAHSA.

The count of households by income group for the rental units and how many are paying more than 50% of monthly household income toward housing costs were derived from the 2014-2018 Comprehensive Affordable Housing Strategy (CHAS) dataset. To calculate the current inventory of units affordable for the qualifying populations, findings from a gap analysis report by the California Housing Partnership (CHP) for the County of Los Angeles were utilized. CHP identified how many rental units were affordable and available to each income group per 100 units. The calculations were applied to renter household counts for the City of Los Angeles. Once the current inventory of affordable units was computed, the total was subtracted from the total number of units for household earning 30% or below AMI and, furthermore, how many are paying for more than 50% of their income for housing costs to determine the gap in rental housing needs for the non-homeless qualified renter subpopulation.

According to the most recent Los Angeles Homeless Point in Time Count (2020), as referenced earlier, for every 207 people who exit homelessness daily, 227 people become homeless, and more than 50% of the people who entered homelessness for the first time, cite economic hardship as the primary reason. This economic hardship is frequently caused and compounded by an unexpected emergency coupled with the high cost of living in Los Angeles. Additionally, nearly half of Los Angeles City households spent over half of their household income on rent and utilities in 2019 (Source: Jovanna Rosen, Sean Angst, Soledad De Gregorio, and Gary Painter. “How Do Renters Cope with Unaffordability?” USC Sol Price School of Public Policy). Similarly, one in four Angelenos faced food insecurity (Source: <https://dornsife.usc.edu/news/stories/3316/public-exchange-covid-19-food-insecurity-los-angeles-county/>). These data points also factored into the unmet needs assessment within the housing stock and service delivery system.

The gaps analysis as it relates to the service delivery system, specifically for those fleeing or victims of domestic violence, was conducted by evaluating data primarily from the 2020 Homeless Count for the City of Los Angeles. As noted previously, this count captured 14,363 sheltered and unsheltered victims of domestic violence. Roughly one in five homeless individuals are also DV victims and require supportive services so as to prevent a return to homelessness. Such services as rental assistance, financial coaching and costs associated with obtaining rental housing would greatly fill an unmet need for this population.

HOME-ARP ACTIVITIES

The HOME-ARP Activities section will discuss how the City will distribute HOME-ARP funds in accordance with priority needs, building off the analysis described above. The two (2) HOME-ARP Activities identified by the City are the following:

1. Rental Housing
2. Supportive Services

In this section, the City will describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractors for these activities.

The City will administer all eligible activities directly.

Rental Housing

The City, through the Los Angeles Housing Department, proposes the use of HOME-ARP funds to produce and rehabilitate affordable and supportive permanent rental housing. LAHD believes that it can provide roughly 1,200 new units of supportive and affordable housing with the \$78 million identified below in Table 7.

Supportive Services

Of the total \$18.64 million budgeted for supportive services, LAHD will utilize \$10.24 million for supportive services that include financial assistance costs for rental assistance and legal services supporting enhanced landlord-tenant education and outreach. LAHD estimates that it can assist 2,000–5,000 households with legal services and 100-500 households with rental assistance, depending on need. Because there is an anticipated deficit of 112,827 units as described in Table 6, this will be felt especially given the lift of the eviction moratorium.

The Community Investment for Families Department (CIFD) will use the remaining \$8.4 million for supportive services, which may include rental and utility assistance, rental arrears, child care, education services, employment assistance and job training, food, housing search and counseling services, legal services, mental health services, substance abuse treatment services, transportation, case management, credit repair, and services for special populations. CIFD estimates that it can assist 200-500 households with financial assistance.

USES OF HOME-ARP FUNDING

TABLE 7. HOME-ARP USES			
	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$18,640,000		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$78,119,965		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$3,131,066	3.1%	15%
Total HOME-ARP Allocation	\$99,891,031		

The City of Los Angeles intends to allocate a majority of funding to the development of affordable, rental housing, which may include contributions of capital and/or operating subsidies for the purpose of creating and supporting units

of affordable housing for the qualifying populations.

Rationale for Uses of HOME-ARP Funding

Homelessness starts rising when median rents in a region exceed 22% of median income and rises even more sharply at 32%. In Los Angeles, the median rent is 46.7% of a household's median income. Due to the slow process of creating affordable housing and lack of high-resourced homeless prevention programs, services and interventions, the City is experiencing a rise in homelessness, with an average of 207 people exiting homelessness, while 227 people become homeless, daily.

Rental Housing

The current point in time count of sheltered and unsheltered homeless individuals amounts to 41,290 and, as mentioned, there are 33,090 enrollees in temporary housing, those individuals will remain sheltered and homeless without an exit unless transitioned to permanent rental housing. Based on the current inventory of units and beds in the City, there remains a housing deficit. Therefore, creation of new housing is at the core of the City's needs.

Supportive Services

As described above, in the housing needs and gap analysis tables (Tables 4 and 5), there is an entrenched need for affordable, rental housing in the City. Furthermore, the economic destabilization brought about by the pandemic created a critical and continuing need for assistance with rental arrears and legal services offering support in preparation of imminent eviction proceedings. In response, the \$18.6 million recommended for supportive service activities seeks to prevent homelessness.

As a component of the supportive services identified, a focus was placed on the needs of those households that are attempting to avert homelessness by providing one-time support in the event of an unforeseen emergency. These funds represent the opportunity to eliminate or minimize an outstanding balance on an expense and avoid further, ongoing financial fallout. Households assisted with this emergency funding would help maintain valuable subsidized housing and shelter resources. More specifically, there are limited resources for QP3 as identified in Table 4, which illustrates a deficit of 13,983 units for that population. Those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking face compounded challenges that are unique to them. Long-term and entrenched financial isolation, limited access to safe housing, and viable job prospects are unique to those QP3 populations. A study by FreeFrom concluded that 92% of domestic violence survivors experienced economic abuse (<http://freefrom.org/support-every-survivor>). Also, 46% indicated the COVID-19 pandemic worsened the economic abuse (<http://freefrom.org/beyond-crisis>). Similarly, 74% of human traffickers use economic coercion to manipulate survivors (Carpenter, A. C. and Gates, J. [2016]. *The Nature and Extent of Gang Involvement in Sex Trafficking in San Diego County*. San Diego, CA: University of San Diego and Point Loma Nazarene University.)

HOME-ARP PRODUCTION HOUSING GOALS

The City is proposing to use HOME-ARP dollars to finance the development and operation of permanent housing for qualifying populations. The City's investment will result in the development of roughly 1,200 units of permanent housing.

Affordable Rental Housing Production Goal and How It Will Address the City's Priority Needs

The City of Los Angeles' plan for investment of HOME-ARP funds has established the pronounced need to finance the creation of permanent supportive housing. In Table 5 above we have accounted for 28,088 existing units of permanent supportive housing for families and individuals, of which the most are occupied. And there is an outstanding gap in service for 28,456 unhoused individuals. Therefore, the units financed through HOME-ARP funds will aid in the effort to increase the stock of permanent supportive rental units that are in dire need and reduce that unmet need.

Project Homekey

The City of Los Angeles continues to make a considerable effort to increase its inventory of affordable housing units. However, the demand for available units far outstrips the supply.

Housing developments typically take at least four years from ideation to occupancy. The State Homekey program requires project completion within 12 months of the funding award, which brings affordable units online on an expedited timeline. The HOME-ARP funds will support Project Homekey with funding for at least 900 units affordable to qualifying households earning up to 30% AMI and will allow the City to be more responsive to the current need for housing the most vulnerable populations. The funds will directly assist with:

- Life and safety system upgrades
- Accessibility upgrades; and
- Capitalizing rental subsidies to leverage State-match rental subsidies

The Project Homekey Funds have slightly different regulations on eligibility for populations to serve and HUD determined that intent to leverage another source of funding that does not serve all QPs is sufficient justification to adopt a corresponding limitation in the HOME-ARP allocation plan. Since not all QPs are eligible for Homekey units, a limitation is described in the section below.

Affordable Housing Managed Pipeline

The Affordable Housing Managed Pipeline's (AHMP) annual supportive housing goal of at least 250 units and affordable housing goal of at least 600 units is based on the availability of outside leveraging sources for projects serving the range of qualifying populations, including Low Income Housing Tax Credits and private debt. The AHMP assists households at or below 60% AMI. For the purposes of HOME-ARP, the regulatory agreements will reflect the requirements of HUD Notice CPD-21-10.

PREFERENCES

The City of Los Angeles recommends using the majority of the HOME-ARP funds to provide affordable rental housing open to all four qualifying populations. In no event would the City give preferences or provide a prioritization scheme that would violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). Therefore, the City will open the activities to all four qualifying populations and will allow preferences for the identified QPs of each activity based on the Needs Assessment and Gaps Analysis and recommendations gathered from both the consultation and public participation efforts.

Permanent Rental Housing

All the affordable and supportive units produced with HOME-ARP funds will be open to all four QPs with an allowable preference for QP1 and QP4 based on order of application to the unit.

Supportive Services

The supportive services for legal aid and rental assistance activity will be open to all four QPs with an allowable preference for QP2, based on order of application to receive services.

The supportive services for establishing and/or operating employment assistance and job training programs and of assisting eligible program participants to locate, obtain and retain housing will be open to all four QPs with an allowable preference for QP3, based on order of application.

Limitations - Project Homekey

The City of Los Angeles will elect to adopt a limitation to its Permanent Rental Housing activity as part of this allocation plan. The State of California's Project Homekey program provides cities a local match to create new permanent housing either through new construction or acquisition and rehabilitation projects.

Project Homekey applies the CoC definitions of homeless and at risk of homelessness. The homeless definition does include people fleeing domestic violence, dating violence, sexual assault, and stalking. But there is no direct mention of people fleeing human trafficking. The CoC definition also requires that other resources or support networks are not available for DV survivors (or QP3), while HOME-ARP does not apply this restriction. While the Homekey definitions may exclude only a very small number of otherwise eligible QPs, these distinctions must be acknowledged and serve as the rationale to adopt a limitation into the allocation plan. However, it should be noted that, in comparing the definitions, no one who is eligible for Homekey would be ineligible for HOME-ARP.

For projects that leverage Homekey funding, the City may limit eligibility to those that meet the definitions of homelessness and at risk of homelessness under the Homekey program, defined at 24 CFR 578.3. This is in an effort to align project requirements in order to blend both state and federal funding sources and ultimately produce more HOME ARP units. Therefore, the plan suggests an option to limit HOME-ARP eligibility to the slightly more restrictive Homekey eligibility requirements for units that have both sources of funding. Specific guidance for the allocation plan states that the City will need to include preferences/limitations in their plan if they intend "to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another funding source."

How will the use of preferences address the unmet need or gap in benefits and services received by individuals and families in the qualifying population

Given the disproportionate homeless population to the number of available permanent units and shelter beds, there is a clear unmet need, resulting from the gap in available beds to the number of unsheltered homeless people, sheltered and unsheltered thus the use of an allowable preference for QP1 and QP4 will help reduce the gap. Additionally, there are several short-term housing beds filled with people who need a permanent bed to exit homelessness. Given this inventory of interim beds without an exit destination, there is an outsized need to meet the number of families and individuals existing interim interventions.

The supportive service category (legal support and rental assistance) will be open to all four QPs and will allow a preference for QP2 due to the fact that the City's renter population pays a disproportionately large share of their income on rent, and with the disruptive nature of the pandemic on many households' incomes, many households have fallen behind on rent and many of these will be vulnerable to eviction orders once local rent moratoria lapse in early 2023.

The supportive services that include emergency assistance will be open to all four QPs and will allow a preference for QP3 due to the fact that those fleeing domestic partner violence and human trafficking situations are acutely, economically vulnerable to falling into homelessness. Households headed by DV or human trafficking, by nature of their need to ensure their safety, necessarily have a limited geographical radius to access housing and services. Shoring up households impacted by domestic violence and/or human trafficking with emergency assistance on rent keeps especially vulnerable, survivor families housed. The disruptive nature of the pandemic on many households' incomes, with an especially detrimental impact on survivor households, has had the effect of families falling behind on rent. Households that have lived through intimate partner violence and/or human trafficking will be vulnerable to eviction orders once local rent moratoria lapse in early 2023.

HOME-ARP REFINANCING GUIDELINES

The City of Los Angeles will not use HOME-ARP funds to refinance existing debt.



Consolidated Plan Amendment 2021-22 - City of Los Angeles (47-03)

Wed, Jan 12, 2022 at 6:19 PM

[REDACTED]
To: cifd.planning@lacity.org

You must be kidding...

\$31 MILLION of taxpayers' money for Homeless, who are coming to Los Angeles from all over the country?

Maybe you should show compassion by donating all City of Los Angeles and County employees salaries to those p[rojects].

You are thieves, stealing working people's money.

Outrageous...



Re: Consolidated Plan Amendment 2021-22 - City of Los Angeles (47-03)

James Thompson [REDACTED]

Thu, Jan 13, 2022 at 11:51 AM

To: Community Investment for Families Department <cifd.planning@lacity.org>

This is an insane use of taxpayer dollars.

Vote no!

James P. Rhompson, Esq.

[REDACTED]

Sent from my iPhone



Landlord's comments regarding proposed program

Bat Sheva Okrent [REDACTED]
 To: cifd.planning@lacity.org

Tue, Jan 25, 2022 at 11:43 PM

1/25/22

From:
 Bat-Sheva Okrent - Landlady
 [REDACTED]

to:
 Angela Peavy, Consolidated Planning Community Investment for Families Department [1200 W. 7th Street, 9th Floor](#)
[Los Angeles, CA 90017](#)

cifd.planning@lacity.org
 213-808-8954

Re.:
 Landlords comments concerning:
 Community Investment for Families Department
 Third Substantial Amendment to the
 47th Program Year (2021-22) Housing and Community Development Consolidated Annual Plan (47-03)

Proposed Programming of Funds for the HOME Investment Partnerships Program – American Rescue Plan And Changes to a Community Development Block Grant (CDBG) Coronavirus Aid, Relief, and Economic Security Act (CARES Act) Project

Dear Ms. Angela Peavy,
 Below are my comments and demands related to the new proposed program as mentioned above. This program should not only be designed to protect tenants, but must include sections specifically designed to protect landlords as well. The program must include the following sections:

1. "Tenants, who do not pay rent - MUST first - produce verifiable proof of financial hardship related to covid. Second - Tenants *must* participate in the Rent Relief Program and be approved. If a tenant refuses to participate or is disapproved by the program, then the tenant must pay full rent or be evicted."
2. "A **LIMIT** on the number of unauthorized occupants that a tenant may bring into his/her apartment, (against the consent of the landlord), in addition to the existing tenants authorized by the rental agreement". This limit must take into account the number of bedrooms in the apartment and the number of already existing tenants living there.
3. "city will pay landlords' utility bills and maintenance expenses when tenants do not pay rent.

4. "City program will reimburse landlords' expenses incurred, due to non rent payment since the beginning of the pandemic".

Ms. Peavy,

Thanks for bringing the above mentioned sections to the attention of the program's committee members.

Also, please confirm receipt of this email.

Lastly, please email me back the committee's response to each of the above mentioned sections.

Thank you,

Bat-Sheva Okrent



HOME Investment Partnerships Program American Rescue Plan (HOME ARP)

Maryam Zar [REDACTED]

Wed, Mar 2, 2022 at 1:20 PM

To: cifd.planning@lacity.org

Cc: Sandra Cervantes <sandra.cervantes@lacity.org>, Mike Bonin <mj.bonin@lacity.org>

I urge LA City Council to support women experiencing homelessness, and to allocate measurable funding to women fleeing or attempting to flee domestic violence - invariably facing homelessness.

City shelters only offer 72 hours of relief for this subset of the vulnerable population, and the threat of homelessness is all too real for women. The underlying conditions are ripe for the compounded vulnerability that directly leads to homelessness.

Additionally, for many of these women, homelessness is accompanied by the added burden of being a single parent. Once the onset of homelessness impact the children, the likelihood that they- next generation - will also slip into homelessness, rises exponentially!

If we are to soberly tackle homelessness in this city, we need to address female homelessness, particularly with a focus on those fleeing domestic violence. Now that we have money to allocate to target vulnerable populations in order to stave off homelessness, we should take the opportunity to address female homelessness with resources that have an impact.

Thank you.

Best,

Maryam Zar

Former City Commissioner, CSW

Former Chair of the Westside Regional Alliance of Councils

Former member of the DV Alliance

Founding Chair of the Pacific Palisades Taskforce on Homelessness



Santa Monica Airport; residents need the Attorney General and HCD's support to capture the incorrectly zoned airport.

T [REDACTED] Tue, Feb 1, 2022 at 11:22 AM

To: housing <housing@doj.ca.gov>

Cc: HousingElements@hcd.ca.gov, california@yimbyaction.org, City of Santa Monica <planning@smgov.net>, Santa Monica Housing Division - Displaced <displaced@santamonica.gov>, Housing Update <housingupdate@smgov.net>, housing@scag.ca.gov, HousingElement@lacity.org, housing@planning.lacounty.gov, contact@abundanthousingla.org, contactCD4@lacity.org, Councilmember Bonin <councilmember.bonin@lacity.org>, sue.himmelrich@smgov.net, Kristin McCowan <kristin.mccowan@gmail.com>, HCIDLA - Planning <cifd.planning@lacity.org>, planning.media@lacity.org, Black Agenda-SM <SantamonicaBlackAgenda@gmail.com>, "Santa Monica Black Lives Assc." <info@smblla.org>

Hi all,

Our petition letter for the incorrectly zoned Santa Monica airport & Penmar golf course will go out today. We are requesting the support of the attorney general to assist pro-housing advocates in capturing the incorrectly zoned airport from the FAA and Santa Monica City so that we can create the much-needed housing that residents needed 10 years ago. With both the airport & penmar golf course, we can get a walkable/bike-friendly community with dense housing and an open park that runs into an already existing park, Clover in Santa Monica.

Our housing proposal will support residents impacted by housing violence at the hands of the system that has 161,000 residents homeless in CA. We are ready to form a community land trust that will permanently protect the affordability of the housing in the area. The trust will also offer market-rate rentals & homeownership opportunities.

Attorney General Rob Bonta, please support housing advocates capture the incorrectly zoned Santa Monica airport. Santa Monica city has been upholding illegal segregation as it relates to race and class for generations now! We cannot allow the city to continue delaying housing as the blue-collar working class, students, senior citizens, and others fall into poverty at historical rates. The time for housing justice NOW, HCD we need your support too!

Happy Black History Month! #BlackHousingMatters

Best,
Tieira

[REDACTED]
www.HTWWS.org/santamonicaairport

<https://htwvs.org/santamonicaairport/> 01/27/21

When the incorrectly zoned Santa Monica airport closes, a closure that should be happening in this upcoming housing element cycle (2021-2029), a walkable community that includes majority affordable housing should be developed. The location is perfect for a community-owned, walkable/bike-friendly residential neighborhood that includes a variety of housing types for working-class residents on the westside, students, seniors, those living with disabilities, and many others in need of affordable housing.



To be clear, this community would include ***both community-owned rental and homeownership options***. This pro-housing advocacy effort should be led by a housing advocate that understands the needs of the local community, someone that likely falls within the working class and has the best interest of the local community in mind. **When it comes to renting, rent should never exceed 20-30% of a resident's total income after taxes. Please keep in mind, the average worker in LA makes about \$39,000 a year, this rental housing would be catered to those workers but the community itself would be mixed-income meaning it would also include market-rate units (still cheaper usually than private market-rate housing).** Along with market-rate rentals, small business/business placements would be considered throughout the community.

Housing proposal for the Santa Monica airport

*(Total acres of the airport is approx. 227 acres. Planning4LA has 17 acres in the current LA City housing element (Mar Vista); SMC Bundy Campus area [SMAirportBundyCampus](#). Please note, we are also requesting Penmar golf course for this project. **Proposal was created by Tieira Ryder**)*

Affordable Homeownership

1. Affordable, reasonably priced homeownership for working-class residents, priority for long-term residents living or working in the Santa Monica, Venice, & Mar Vista zip codes.
2. Consider a set number of market-rate "for-sale" homes.

3. A variety of home types should be considered for development but especially multi-family housing such as plexes, condos, townhomes, and apartments. **Consider co-op ownership.**
4. **Priority consideration should also go to first-time homeowners in LA County, my recommendation is residents that have lived/worked at least 10 years in LA County.**
5. Priority consideration for historically displaced residents from supposed marginalized communities. Consider a 30-40% "right to return", "right to housing" for ADOS families. **(Google the history of displaced Black families in Santa Monica, Venice, and/or Manhattan Beach if you need more info.)**
6. The millennial generation should also receive a percentage of priority consideration, they currently own a measly 18% of the homes in Los Angeles. ***"Equity is defined as "the state, quality or ideal of being just, impartial and fair." The concept of equity is synonymous with fairness and justice."***
7. At no time would a small or large equity firm be granted permission to purchase a home within the community nor would an option be granted to purchase the community as a whole.
8. ***My recommendation on income qualifications for residents that are first-time buyers is working-class residents making between \$30,000-\$130,000.***
9. If potential owners require financing, ownership could be subject to ***credit union or bank approval. Consider public, city-owned bank.***
10. The actual cost of homes should match that of the actual average wage of what most working-class residents make. There would likely be re-sell requirements as affordability would be protected by a trust.

Affordable Housing Rentals

1. Community-owned rental housing in mixed-income developments.
2. The recommended height for apartment buildings is 6-7 stories.
3. Set an **“affordable rental rate” based on what the average person from the working class makes. At this moment, most workers in LA make about \$39,000 a year. Affordability is usually priced for residents in the \$17,000-\$70,000 range.**
4. Community-owned market-rate rentals to be included, most likely still cheaper than the private market, market-rate rental housing.
5. No income **restrictions** once residents are housed.
<https://www.nhlp.org/resources/lihtc-admissions-rents-grievance-procedures/>
6. Reserve a portion of the housing for **limited to no-income residents**, considering subsidizing with; 1. HUD and/or new digital voucher program. 2. subsidize low to no income residents with market-rate apartment & business rentals. 3. Consider HCID/HACLA westside chapter. Social services for housing, food, and health-care should be ONE efficient program.
7. Affordable bachelors, studios, 1, 2, and 3 bedrooms.
8. As with *affordable homeownership*, the rental units & placements would be for various types of community members but especially **keeping in mind our core working class which includes the essential workforce, students, seniors, veterans, those living with disabilities, etc. etc.**
9. Student apartments would be bachelor-sized apartments with smaller fridges and MUST have a kitchen area sink and a small area to put a

<https://htwvs.org/santamonicaairport/> 01/27/21

hot plate (or something similar) so they can cook if needed. (Similar to this <https://urbanize.city/la/post/micro-unit-apartment-building>)

More info on the proposed community as a whole

1. Consideration of business placements within the community.
2. Open park space, recreation center within the walkable community.
3. Consider the possible need to build new schools.
4. Consider a quality westside transit system especially for college students between SMC and/or UCLA. (cut down on car traffic congestion because students wouldn't need to drive)
5. College student housing should have its own small park area that has a WIFI and outdoor/indoor workspace for them.
6. Consider large home space for displaced minors within the community aka a "group home" to provide stability.
7. ***Request consideration for golf course closure(s) as well as other vacant land plots and buildings that have potential use for affordable housing that is community-owned and suits apartments, condos, townhomes, small and/or tiny homes for locals.*** Request more interim housing and healthcare sites on the westside for residents with long-term behavioral health needs.
8. The bigger goal is to adopt a similar social housing policy for each city in California with pro-housing community advocates from said cities leading the efforts!

This space for filing stamp only

(When required)
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 LOS ANGELES, CA - 90012

PROOF OF PUBLICATION

(2015.5 C.C.P.)

State of California)
 County of Los Angeles) ss

Notice Type: GPN - GOVERNMENT PUBLIC NOTICE

Ad Description:
 Los Angeles Housing and Community Development Annual Plan 2022-23

I am a citizen of the United States and a resident of the State of California; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer and publisher of the LOS ANGELES DAILY JOURNAL, a newspaper published in the English language in the city of LOS ANGELES, county of LOS ANGELES, and adjudged a newspaper of general circulation as defined by the laws of the State of California by the Superior Court of the County of LOS ANGELES, State of California, under date 04/26/1954, Case No. 599,382. That the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

10/05/2021

Executed on: 10/05/2021
 At Los Angeles, California

I certify (or declare) under penalty of perjury that the foregoing is true and correct.



Signature



Email * A 0 0 0 0 0 5 8 5 2 3 3 5 *

DJ#: 3517565

How can federal grant funds help your neighborhood?
Los Angeles Housing and Community Development Annual Plan 2022-23
 Help us create more vibrant and healthy neighborhoods in LA where our families can thrive! Please join a virtual conversation about investments for lower-income communities made with millions of dollars in federal grants. Learn about the Housing and Community Development Annual Plan for the City of Los Angeles, and how it improves neighborhoods through affordable housing, human services, business loans, community centers, parks, street improvements, and other benefits. Tell us what's important for your neighborhood for 2022-23!
 Tuesday, October 19, 2021
 5:00 PM to 6:30 PM
 OR
 Wednesday, October 20, 2021
 5:00 PM to 6:30 PM
 Both virtual meetings will discuss the same information and both will be held in English and Spanish.
 To register for the Zoom meetings, please visit:
<https://housing.lacity.org/community-resources/community-input>
 Please also see the website to take our survey about what's important for your neighborhood. The survey is available through October 31, 2021. If you can't attend, please send your comments to cifd.planning@lacity.org. Meetings are held by the City of Los Angeles Community Investment for Families Department. Due to technological changes, if TTY is needed to contact us, please use Telecommunication Relay Service, Shared Non-English Language Relay Services, Captioned Telephone Service, IP Captioned Telephone Service, Internet Protocol Relay Service, or Video Relay Service.
Note: The following paragraph must be included at the bottom of every public ad.
 The right is reserved to waive informalities in proposals received and to reject any or all such proposals. The provisions of Division 10, Section 10.8 through 10.13 and Section 10.31 of the Los Angeles Administrative Code requiring non-discrimination and Affirmative Action in hiring persons will be a part of any contract awarded pursuant to this notice. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodations to ensure equal access to its programs, services and activities.

10/5/21 DJ-3517565#

YOUR NEIGHBORHOOD YOUR FUTURE



**COMMUNITY
INVESTMENT
FOR FAMILIES
DEPARTMENT**

Paths to Prosperity

How Can Federal Grants Help Your Neighborhood?



Housing & Community Development Funds

Every year, Los Angeles receives over \$100 million in federal grant funds to benefit lower-income residents. Through housing, parks, shelters, business loans, and more, the City seeks to relieve social and economic problems.

**Two Sessions Available! Join our Zoom meetings to share your vision!
Please register with the links or QR codes below.**

Tuesday
October 19

**October 19th & 20th, 2021
5:00 PM – 6:30 PM**

Wednesday
October 20



Please also take our survey here!



**Both sessions will contain the same information
and be presented in both Spanish and English.**

Connect with us:

Website: housing.lacity.org/community-resources/community-input

E-mail comments to: cifd.planning@lacity.org

Due to technological changes, if TTY is needed to contact us, please use Telecommunication Relay Service, Shared Non-English Language Relay Services, Captioned Telephone Service; IP Captioned Telephone Service, Internet Protocol Relay Service, or Video Relay Service.

SU COMUNIDAD SU FUTURO



Attachment B

**COMMUNITY
INVESTMENT
FOR FAMILIES
DEPARTMENT**

Paths to Prosperity

¿Cómo pueden las subvenciones federales ayudar a su vecindario?

Fondos de Vivienda y Desarrollo Comunitario

Cada año, Los Ángeles recibe más de \$100 millones en fondos de subvenciones federales para beneficiar a los residentes de bajos ingresos. A través de viviendas, parques, albergues, préstamos comerciales y más, la Ciudad busca aliviar los problemas sociales y económicos.

¡Dos Sesiones Disponibles!

**¡Únase a nuestras reuniones de Zoom para compartir su visión!
Regístrese con los enlaces o códigos QR a continuación.**

19 y 20 de octubre de 2021

5:00 PM – 6:30 PM

Martes

19 de octubre



¡Responda a nuestra encuesta aquí!



Miércoles

20 de octubre



**Ambas sesiones contendrán la misma información
y se presentará tanto en español como en inglés.**

Conéctese con nosotros:

Sitio de Internet: housing.lacity.org/community-resources/community-input

Correo Electrónico: cifd.planning@lacity.org

Debido a cambios tecnológicos, si se necesita TTY para ponerse en contacto con nosotros, por favor utilice el Servicio de Retransmisión de Telecomunicaciones, Servicios de Retransmisión de Idioma No Inglés Compartido, Servicio telefónico subtítulado; Servicio telefónico con subtítulos



Consolidated Plan Amendment 2021-22 - City of Los Angeles (47-03)

Community Investment for Families Department <cifd.planning@lacity.org>
Reply-To: Community Investment for Families Department <cifd.planning@lacity.org>

Wed, Jan 12, 2022 at 5:21 PM

[View this email in your browser](#)



Consolidated Plan Amendment 2021-22 - City of Los Angeles (47-03)

HOME Investment Partnerships Program - American Rescue Plan and Project Location Change

The [third Substantial Amendment to the 47th Year Annual Plan](#) is now posted on the [Community Investment for Families Department website](#).

Purpose

In accordance with the Code of Federal Regulations (found under 24 CFR Parts 91.105 and 91.505), and our Citizen Participation Plan, the City of Los Angeles is required to provide citizens with an opportunity to comment on all proposed Substantial Amendments to its Housing and Community Development Consolidated Annual Action Plan (Con Plan). The City wishes to notify the public of a substantial amendment to its 47th Year (PY 46) 2020-21 Con Plan.

A 15-day public comment period will provide the public with an

opportunity to review and comment on this proposed third amendment, beginning January 12, 2021 and ending on January 28, 2022.

Due to technological changes, if TTY is needed to contact us, please use Telecommunication Relay Services (TRS) such as Text-to-Voice TTY-based TRS, Speech-to-Speech Relay Service, Shared Non-English Language Relay Services, Captioned Telephone Service; IP Captioned Telephone Service, Internet Protocol Relay Service, or Video Relay Service.

Debido a los cambios tecnológicos, si se necesita TTY para comunicarse con nosotros, por favor use los Servicios de retransmisión de Telecomunicaciones (TRS) tales como TRS basado en texto a voz TTY, Servicio de retransmisión de voz a voz, Servicios de retransmisión de Lenguaje compartido no Inglés, Servicio telefónico con subtítulos; Servicio telefónico con subtítulos IP, Servicio de retransmisión de Protocolo de Internet o Servicio de retransmisión de Video.



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Our mailing address is:

Los Angeles Community Investment for Families Department
[1200 W. 7th Street](#), 9th Floor
Los Angeles, CA 90017

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**Community Investment for Families Department
Third Substantial Amendment to the
47th Program Year (2021-22) Housing and Community Development Consolidated Annual Plan
(47-03)**

**Proposed Programming of Funds for the HOME Investment Partnerships Program – American Rescue Plan
And Changes to a Community Development Block Grant (CDBG) Coronavirus Aid, Relief, and Economic
Security Act (CARES Act) Project**

Purpose

In accordance with the Code of Federal Regulations (found under 24 CFR Parts 91.105 and 91.505), and the City's Citizen Participation Plan, the City of Los Angeles is required to provide citizens with an opportunity to comment on all proposed Substantial Amendments to its Housing and Community Development Consolidated Annual Plan (Con Plan). The City wishes to notify the public of a substantial amendment to its 47th Program Year (PY 47) 2021-22 Con Plan.

The American Rescue Plan (ARP) Act of 2021 authorizes an expedited public comment period for the HOME Investment Partnerships Program one-time supplemental ARP grant funding (HOME-ARP), and the public will have at least 15 days to review and comment, beginning about January 12, 2022 and ending January 28, 2022.

The CARES Act authorizes an expedited public comment period for the substantial amendment that addresses the one-time supplemental CARES Act grant funding, and the public will have at least five days to review and comment, in accordance with a federal waiver requested April 7, 2020 and effective April 9, 2020. The public comment period will begin about January 12, 2022 and end January 28, 2022.

HOME-ARP Background

The American Rescue Plan (ARP) Act of 2021 was signed into law on March 11, 2021, which included supplemental funding from the U.S. Department of Housing and Urban Development (HUD) for the HOME Investment Partnerships Program (HOME) to support the prevention and reduction of homelessness, which was exacerbated nationwide as a result of the economic decline brought on by the COVID-19 pandemic. The City of Los Angeles was awarded \$99,891,031.

The funds can be used for four main activities:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units

The activities must be targeted to the following populations:

1. Homeless persons and families, according to the McKinney-Vento Homeless Assistance Act definition (https://www.hud.gov/sites/documents/HAAA_HEARTH.PDF)
2. Those at-risk of homelessness (McKinney-Vento definition)
3. Those fleeing or attempting to flee domestic violence, dating violence, sexual violence, stalking, or human trafficking
4. "Other populations" where supportive services or assistance would prevent the person or family from becoming homeless or serve those with the greatest risk of housing instability
5. Veterans and families that include a veteran that meet one of the above criteria

Proposed HOME-ARP Programs and Allocations

In line with the above federal guidance, the City of Los Angeles proposes the following four programs.

Project Homekey Match \$60,000,000

This program will assist in the acquisition, rehabilitation, and operation of 750+ permanent supportive housing units. The funds will assist with: due diligence and closing costs, life and safety upgrades, accessibility upgrades, and capitalizing rental subsidies to leverage State-matched rental subsidies. It is estimated that over 750 households experiencing homelessness or chronic homelessness will be able to obtain permanent supportive housing within 90 days from completion of rehabilitation. Project Homekey was initiated by funding from the State, and the federal HOME-ARP funds will serve as a match to the State funding. Supportive housing units include wrap-around services to residents by community-based organizations that address reducing barriers to maintaining housing that residents may experience.

Affordable Housing Managed Pipeline (AHMP) \$20,000,000

The goal of the AHMP is to produce at least 250 supportive housing units each year, with at least 50% of units for extremely low-income, very low-income, chronically homeless, and special needs households, and the remaining units for low-income households, according to HUD's definitions. The HOME-ARP funds will leverage other resources to support ongoing program operations of financing the construction of new affordable housing units.

Eviction Defense Program \$10,000,000

The City has provided eviction prevention and eviction defense services through the provision of legal services, rental assistance and supportive services for tenant stability for low-income households. This program will help reduce the number of evictions in Los Angeles, minimize illegal violations by property owners, and promote long-term housing stability for vulnerable residents. The funding will be used for outreach and public awareness, pre-eviction and on-going legal assistance, rental assistance, support services for tenant stability, and data collection and evaluation. It is estimated that 100,000 households will be reached through outreach and public awareness, and an additional 2,000-4,000 households will receive legal assistance for eviction prevention and defense.

Emergency Needs Fund \$7,000,000

This fund will help pay costs that include, but are not limited to: rent and utility costs, unexpected car repairs, child care, food, credit repair, and other emergency needs that are not otherwise provided to the household with other federal funds. It is estimated that 1,200 households at risk of homelessness will be served.

Administration \$2,891,031

The staff of the Community Investment for Families Department (CIFD) and Los Angeles Housing Department (LAHD) will oversee and administer the HOME-ARP programs, and may also support other City departments performing administrative activities. Funds may also provide equipment necessary for the implementation of the programs.

CDBG CARES Act Pallet Shelter Project –Change to the Locations

A prior notice was issued on September 2, 2020, that provided information on this project. Part of the LA City-County Homeless Roadmap Agreement to provide temporary housing for homeless individuals, pallet shelters are temporary, insulated housing solutions set up to house individuals who are currently homeless and affected by the COVID-19 pandemic. The previous locations were seven sites in Council Districts 2, 3, 13, and 15 with up to 700 beds. Due to increasing construction costs, the project is currently three sites in Council Districts 1, 6, and 14, with up to 517 beds.

Public Comments

The public comment period on the proposed programming is from about January 12, 2022 to January 28, 2022.

Please submit questions or comments as follows:

E-mail: cifd.planning@lacity.org
Telephone: 213-808-8954
Mail to: Angela Peavy, Consolidated Planning
Community Investment for Families Department
1200 W. 7th Street, 9th Floor
Los Angeles, CA 90017

Due to technological changes, if TTY is needed to contact us, please use Telecommunication Relay Services (TRS) such as Text-to-Voice TTY-based TRS, Speech-to-Speech Relay Service, Shared Non-English Language Relay Services, Captioned Telephone Service; IP Captioned Telephone Service, Internet Protocol Relay Service, or Video Relay Service.



Fwd: 02/22/2022 02:30 PM - SPECIAL MEETING - Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment

From: **City Clerk** <Clerk.LSadmin@lacity.org>
Date: Fri, Feb 18, 2022 at 1:03 PM
Subject: 02/22/2022 02:30 PM - SPECIAL MEETING - Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment
To: <CLK_3601@listserv.lacity.org>

TITLE: SPECIAL MEETING - Ad Hoc Committee on COVID-19 Recovery and Neighborhood Investment

DATE: 02/22/2022

TIME: 02:30 PM

To view the document online please visit: http://ens.lacity.org/clk/committeeadend/clkcommitteeadend3601158988_02222022.htm

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To view the agenda ePackets with background documents please visit: <https://cityclerk.lacity.org/councilagenda/>

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Paths to Prosperity



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**COMMUNITY
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DEPARTMENT**
Paths to Prosperity



Updates to the HOME Investment Partnerships Program – American Rescue Plan Programs (47th Program Year 2021-22 Housing & Community Development Consolidated Annual Plan)

Purpose

In accordance with the Code of Federal Regulations (found under 24 CFR Parts 91.105 and 91.505), and the City's Citizen Participation Plan, the City of Los Angeles is required to provide citizens with an opportunity to comment on all proposed Substantial Amendments to its Housing and Community Development Consolidated Annual Plan (Con Plan).

The American Rescue Plan (ARP) Act of 2021 authorizes an expedited public comment period for the HOME Investment Partnerships Program one-time supplemental ARP grant funding (HOME-ARP), and the public will have at least 15 days to review and comment, beginning about December 15, 2022 and ending January 3, 2023.

HOME-ARP Background

The American Rescue Plan (ARP) Act of 2021 was signed into law on March 11, 2021, which included supplemental funding from the U.S. Department of Housing and Urban Development (HUD) for the HOME Investment Partnerships Program (HOME) to support the prevention and reduction of homelessness, which was exacerbated nationwide as a result of the economic decline brought on by the COVID-19 pandemic. The City of Los Angeles was awarded \$99,891,031.

The funds can be used for four main activities:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units

The activities must be targeted to the following populations:

1. Homeless persons and families, according to the McKinney-Vento Homeless Assistance Act definition (https://www.hud.gov/sites/documents/HAAA_HEARTH.PDF)
2. Those at-risk of homelessness (McKinney-Vento definition)
3. Those fleeing or attempting to flee domestic violence, dating violence, sexual violence, stalking, or human trafficking
4. "Other populations" where supportive services or assistance would prevent the person or family from becoming homeless or serve those with the greatest risk of housing instability
5. Veterans and families that include a veteran that meet one of the above criteria

Proposed HOME-ARP Programs and Allocations

Since the previous notice in January 2022, the program information is updated. In line with the above federal guidance, the City of Los Angeles proposes the following programs.

These units will assist in the acquisition, rehabilitation, and operation of 1,178 permanent affordable and supportive housing units. The funds will support the following: due diligence and closing costs, life and safety upgrades, accessibility upgrades, and capitalizing rental subsidies to leverage State-matched rental subsidies. Units produced as part of the HOME ARP grant will prioritize all of the qualifying populations, this includes: chronically homeless households, households at-risk of homelessness, those fleeing or attempting to flee domestic violence, dating violence, sexual violence, stalking, or human trafficking, and “other populations” where supportive services or assistance would prevent the household from becoming homeless or those with the greatest risk of housing instability.

Eviction Defense Program \$10,200,000

The City has provided eviction prevention and eviction defense services through the provision of legal services, rental assistance and supportive services for tenant stability for low-income households. This program will continue and be expanded to the above-named target populations. Services will help reduce the number of evictions in Los Angeles, minimize illegal violations by property owners, and promote long-term housing stability for vulnerable residents. The funding will be used for outreach and public awareness, pre-eviction and on-going legal assistance, rental assistance, support services for tenant stability, and data collection and evaluation. It is estimated that 100,000 households will be reached through outreach and public awareness, and an additional 2,000-4,000 households will receive legal assistance for eviction prevention and defense.

Emergency Needs Fund \$8,440,000

This fund will help pay costs that include, but are not limited to: rent and utility costs, unexpected car repairs, child care, food, credit repair, and other emergency needs that are not otherwise provided to the household with other federal funds. It is estimated that 1,200 households at risk of homelessness, those fleeing or attempting to flee domestic violence, dating violence, sexual violence, stalking, or human trafficking, and “other populations” where supportive services or assistance would prevent the person or family from becoming homeless or those with the greatest risk of housing instability will be served.

Administration \$3,131,066

The staff of the Community Investment for Families Department (CIFD) and Los Angeles Housing Department (LAHD) will oversee and administer the HOME-ARP programs, and may also support other City departments performing administrative activities. Funds may also provide equipment necessary for the implementation of the programs.

Public Comments

The public comment period on the proposed programming is from about December 15, 2022 and ending January 3, 2023.

This notice will be posted on the following web address:

<https://communityinvestmentforfamilies.org/consolidated-plan-changes-plans>

Please submit questions or comments as follows:

Email: cifd.planning@lacity.org

Mail to*: Angela Peavy, Consolidated Planning
Community Investment for Families Department
1200 W. 7th Street, 4th Floor
Los Angeles, CA 90017

*Please note that mail processing may be delayed due to COVID-19.