

# HOME-ARP Allocation Plan Template

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** City of Seattle

**Date:** 7/15/2022

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) 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, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### *Summarize the consultation process:*

Seattle Office of Housing conducted individual outreach to the organizations listed below specifically to discuss the best use of HOME-ARP funds.

The Consolidated Plan relies on multiple planning efforts from a variety of sources to inform the allocations of the Consolidated Plan funds. The consultation process illustrates how HUD funds are part of a much larger funding picture for housing, human services, and community development in the City of Seattle. Through the Area Agency on Aging, King County Regional Homelessness Authority, Seattle/King County Continuum of Care, the Mayor’s Emergency Task Force on Unsheltered Homelessness, the City’s Housing Affordability and Livability Advisory (HALA) Committee, Seattle 2035 Comprehensive Plan Update, the Mayor’s Commercial Affordability Advisory Committee, and the Human Services Department’s Pathways Home plan, the City’s planning efforts inform changes and updates to our homelessness prevention and service system, while providing key opportunities for consultation and public input. In addition, the City’s 2021 Adopted (first year of biennial budget) and 2022 Proposed Budget include significant general public input and discussion to shape policy and budget priorities. The budget is passed by City Council in November each year. A draft of the Substantial Amendment to the 2021 Annual Action Plan was publicized and made available for public comment for a 15- day public comment period beginning November 5, 2021.

Additionally, on HUD’s urging, the City posted the Substantial Amendment for a third public comment process alongside its CAPER public process, with posting on May 16. As of June 8, the City had received no further public comment.

Additionally, additionally, HUD required the City to post this Substantial Amendment for a fourth public comment process out of concerns with how the CAPER process was performed. The City reposted this amendment on X/XX/XXXX and received XXXXXX comments.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>King County Regional Homelessness Authority</b>	Continuum of Care	Coordinating around use of all federal funds and leveraging other funding sources. Met on 11/2 at 2pm.	Feedback.

<b>Low Income Housing Institute, Chief Seattle Club, SeaMar, Pioneer Human Services, Plymouth Housing, YWCA, El Centro de la Raza, Downtown Emergency Services Center, Catholic Housing Services</b>	Homeless Service Provider	Individual meetings with each of these groups.	<p>Homeless service and housing providers have worked at the highest intensity level during the COVID-19 pandemic. They have taken on significantly more work, and want to do more to contribute to ending homelessness in our community. They ask that government funders streamline requirements, reduce barriers, and work with urgency wherever possible.</p> <p>YWCA and DESC requested new housing construction to match their clients' needs</p> <p>Providers expressed worry about HUD's new Qualified Populations and referral process</p>
<b>Chief Seattle Club; YWCA; Mayor's Office on Domestic Violence and Sexual Assault; SeaMar</b>	Domestic Violence Service Provider	Individual meetings with each of these groups. Also attended Mayor's domestic violence stakeholder committee.	General support for more permanent housing and Considering ways to coordinate across offices to benefit people who have experienced DV/SA
<b>Catholic Community Services; VA and PHA's VASH coordination</b>	Veterans' Groups	Contacted VA and individual veterans facing housing insecurity.	Inability to access services leads to health problems that lead to inability to work that lead to housing insecurity and homelessness.
<b>Seattle Housing Authority</b>	Public Housing Agency	In addition to meeting on 11/2 at 2pm, we have been meeting with SHA for several months about coordination of housing investments.	Excited to partner emergency vouchers new permanent supportive housing projects, supportive of affordable housing investments in the City of Seattle.
<b>King County, State of Washington, WSHFC, partnering with state HTF</b>	Public agencies that address the needs of the qualifying populations	Monthly meeting	Coordinating funding programs to achieve leverage. County and State both developing HOME-ARP plans concurrently.

<b>Office of Civil Rights</b>	Fair Housing Organization	Individual outreach from Office of Housing	Feedback.
<b>Office of Civil Rights, ACLU</b>	Civil Rights Organization	Individual outreach from Office of Housing	Feedback.

If additional space is needed, insert image of table here:

## Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

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

- ***Public comment period: start date – 10/23/2021 end date – 12/7/2021***
- ***Public hearing: 11/9 and 12/7 2021***

On November 9, 2021 the Seattle Office of Housing hosted a public hearing on the HOME-ARP Allocation Plan. Laurie Olson, Capital Investments Manager presented the amount of HOME-ARP City of Seattle will receive; \$12,200,684 and stated that the planned range of activities include the acquisition, rehabilitation, construction, and/or preservation of multifamily rental housing to serve Qualified Populations. The City held a second public hearing at City Council on 12-7-2021. City Council hearings make ADA and language assistance available as a matter of course <https://www.seattle.gov/americans-with-disabilities-act#requestanaccommodation> and <https://www.seattle.gov/iandraffairs/LA>. The City posted the amendment for public comment again on May 16

<https://seattle.gov/documents/Departments/Housing/HOME-ARP-Allocation-Plan.pdf>

As of 23 calendar days later on June 8, the City had received no further public comment.

***Describe any efforts to broaden public participation:***

The City provided two opportunities for public comment; first in the November 9 public comment hearing presented by Office of Housing, and second in a City Council meeting. Council approved the substantial amendment before its submission to HUD.

The November 9<sup>th</sup> meeting was advertised in the Daily Journal of Commerce and by email to the Office of Housing's email list. The Office of Housing's October 21<sup>st</sup> newsletter is attached and was delivered to 2,074 recipients.

Outreach resulted in attendance by four citizens, representing Indigenous, Asian-American, African-American, and Homeless communities. Comments are summarized in the below section and are a demonstration that interested members of the public could access the Plan and provide meaningful comment.

Seattle City Council conducts outreach and provides accessibility to its meetings. A copy of that meeting notice and agenda – with instructions for requesting accessibility services – is attached. The City made the HOME-ARPA Substantial Amendment additionally available through City Council's meeting packet, where it was and remains available here <http://seattle.legistar.com/MeetingDetail.aspx?ID=909252&GUID=FBC32BA4-39D3-4D26-B9EC-4772B436BF8E&Options=info&Search=> Members of the public attended this hearing, but none made public comment. The City Council committee unanimously passed an ordinance to adopt the amendment to its Action Plan and authorize the receipt of funds from HUD.

November 5 to December 7 is 28 calendar days. HUD's disapproval letter inaccurately counted the Public Comment period as it was in no way cut off on November 9<sup>th</sup>.

A third posting occurred on May 16, 2022 alongside the CAPER public process, as detailed above and in attachment.

A fourth posting required by HUD occurred on X/XX/XXXX, 17 months after Congress passed HOME-ARPA, 19 months after President Biden announced ARPA saying, "The need to act is clear," and 10 months since Secretary Fudge announced that HUD would "use the historic investments provided through the American Rescue Plan to address the crisis of homelessness through a Housing First approach by immediately re-housing and building additional housing for people experiencing homelessness."

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

Sharon Lee, Executive Director Low Income Housing Institute (LIHI) stated that LIHI is happy these funds are being made available and wishes it were more than \$12M. LIHI believes there are opportunities to acquire buildings, especially brand new buildings, for permanent supportive housing and they encourage OH to use the dollars for this purpose as the most efficient way to house the homeless. Purchase of existing buildings to serve needs of BIPOC homeless people should be highest priority and adds that there might be some opportunities for preservation of existing housing, especially in areas experiencing displacement. Sharon also asked whether these funds are part of the 2022 budget that City Council is considering now. Laurie Olson replied that these funds are included in the 2021 budget and should be available after approvals. The City also concurs with the use and prioritization of funds suggested by LIHI, to the degree possible while complying with Fair Housing.

Derrick Belgarde, Executive Director of the Chief Seattle Club stated that they support the City's stewardship of the \$12.2M award. He stated that the City's support has been instrumental in Chief Seattle Club creating housing and shelter focused on Indigenous people, who are very over-represented in Seattle's homeless population. Chief Seattle Club support the City's intentions with HOME-ARP Funds.

Kimberly Arrington White, Chief Supportive Housing Officer, Plymouth Housing stated that they are currently struggling to increase wages to retain quality staff to serve residents. They have 48 vacancies out of 200 some service staff. Laurie Olson responded that the City Office of Housing acknowledges these staffing difficulties and stands behind Plymouth in its attempts to address the issue.

The hearing was also attended by Karen Peterson, Kelli Larsen, and Jamie Madden.

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

On February 7, 2022, Sharon Lee sent an email to the Director of HUD's Office of Affordable Housing Programs, copying City Staff. The email stated: Happy Lunar New Year! How are you? I have been working with Sea Mar and the Seattle Office of Housing to close on the property at 1807 13th Ave S., in Seattle. This building will serve homeless women. It is a wonderful brand new building. We are hoping you can approve release of the HOME ARPA funds as quickly as possible as Sea Mar must purchase the property soon. We have homeless women waiting to move in and we are concerned with delays in being able to buy the property.

The email did not indicate that any project to be funded from HOME-ARP would be exclusive to one gender, which of course would violate Fair Housing Laws. Any statement to the contrary is factually incorrect. The City has since awarded this project with local funding and is ensuring the owner is following Fair Housing rules. The City has not committed federal funds to this project, and the City vigorously enforces Fair Housing compliance in its funded developments. The City does not accept these as comments to this Substantial Amendment. The City affirmatively states that a third party email to HUD is not part of its Plan Submission, despite HUD's inclusion of it in its rejection of this Substantial Amendment. The City reiterates its commitment to Affirmatively Furthering Fair Housing.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

### OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	1696	436	3119	#	75								
Transitional Housing	1522	430	577	#	107								
Permanent Supportive Housing	1280	425	4969	#	1540								
Other Permanent Housing						1328	403	21	#				
Sheltered Homeless						1171	3967	342	#				
Unsheltered Homeless						1309	4368	502	#				
<b>Current Gap</b>										#	3808	#	2568

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

### OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	193101		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	8161		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8165		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		60445	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		44710	
<b>Current Gaps</b>			29710

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)



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

**1- Currently Homeless**

According to the 2020 Point in Time Count, 11,751 individuals in Seattle/King County were experiencing homelessness 72% of whom were staying in the City of Seattle. Roughly half are unsheltered, with the 2020 count reporting that 47% of those experiencing homelessness were living without shelter.

Compared to the overall population of Seattle/King County, homelessness disproportionately impacts people of color. Black/African Americans (7% of the general population; 25% of population experiencing homelessness), American Indian/Alaska Native (1% of the general population; 15% of population experiencing homelessness), Native Hawaiian/Other Pacific Islander (1% of the general population; 4% of population experiencing homelessness) experience disproportionately higher rates of homelessness according to the 2020 count. Additionally, compared to the Seattle/King County general population, homelessness disproportionately affects Hispanic/Latinx individuals (of any race). Seattle/King County is comprised of 10% Hispanic/Latinx individuals, yet 15% of individuals experiencing homelessness in 2020 identify as Hispanic/Latinx.

From 2017-2020, males experience higher rates of homelessness compared to female, transgender, and gender non-conforming groups. However, the rate of females experiencing homelessness has continued to increase since 2018 to 41% of the 2020 count.

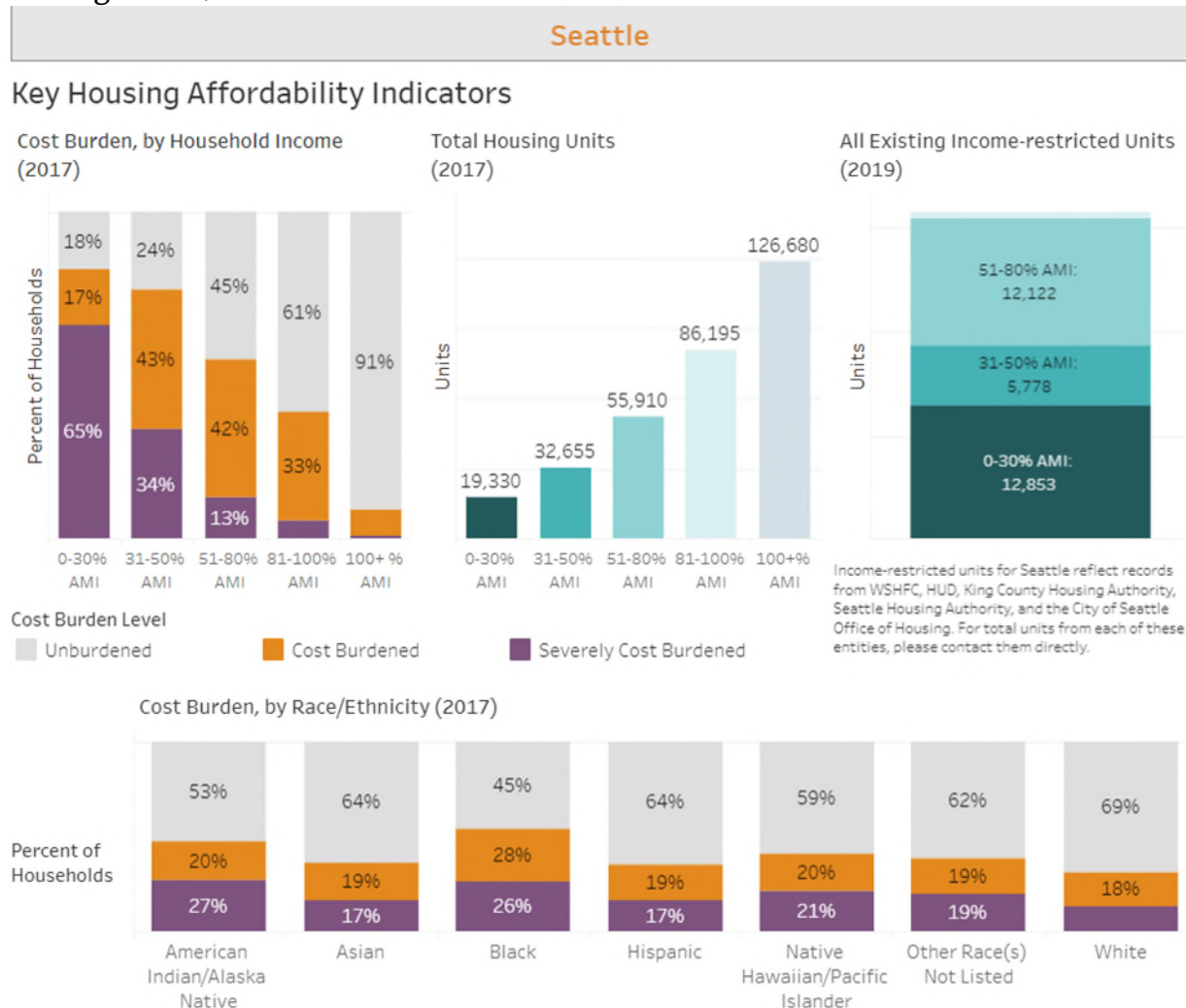
According to the Point in Time count 1,190 Families with Children representing 3,743 adults and children were experiencing homelessness on the early morning of January 24, 2020. Of these, approximately 100 families (comprised of 251 individuals) are from youth parenting households. Approximately, 71% of individuals in families with children were sheltered, and 29% were unsheltered.

According to OSPI, Office of Superintendent of Public Instruction (Washington State) there are 4,169 homeless students in Seattle. 40% are black. Only 12.5% are white.

**2 – At imminent risk of homelessness**

Housing costs remain the primary driver of homelessness and housing insecurity in Seattle. Professor Gregg Colburn in the recently published Homelessness is a Housing

Problem demonstrates conclusively that it is the lack of affordable housing, not a lack of services to address precipitating events that is the root cause of homelessness in Seattle and other high cost cities. In Seattle, 76% of all renter households earning 50% AMI or less are cost burdened or severely cost burdened. Overall, in Seattle, there is a shortage of 29,710 units affordable and available to households at or below 50% AMI.



Source: Market Rate Housing Needs and Supply Analysis (Berk), HUD CHAS (based on ACS 2013-2017 5-year estimates); City of Seattle calculation

#### [Latest U.S. Census Pulse Data, 12/29-1/10:](#)

83,981 renters are not caught up on rent

74,853 (89%) of renters not caught up on rent are making less than \$75k

55,200 (30%) of renters not caught up on rent are making less than \$25k

This is largely impacting people with low incomes

46,067 renters report no confidence in making next month's rent payment

66% of renters reporting no confidence in making next month's rent payment are making less than \$75k

33,072 renters report they are very or somewhat likely to be evicted in the next two months

67% of renters reporting they are very or somewhat likely to be evicted in the next two months are making less than \$75k

Race/ethnicity for renters not caught up on rent:

30%	Hispanic or Latino (may be of any race)
35%	White alone, not Hispanic
8%	Black alone, not Hispanic
7%	Asian alone, not Hispanic
19%	Two or more races + Other races, not Hispanic

#### Cost burden – City of Seattle

<u>Income by Cost Burden (Renters only)</u>	<u>Cost</u>	<u>Cost</u>	<u>Total</u>
	<u>burden &gt;</u>	<u>burden &gt;</u>	
	<u>30%</u>	<u>50%</u>	
Household Income <= 30% HAMFI	27,265	22,150	37,490
Household Income >30% to <=50% HAMFI	17,170	7,855	20,550
Household Income >50% to <=80% HAMFI	13,730	2,380	21,720
Household Income >80% to <=100% HAMFI	6,610	605	16,805
Household Income >100% HAMFI	6,080	200	77,865
<b>Total</b>	<b>70,855</b>	<b>33,190</b>	<b>174,430</b>

Source: CHAS with 2014-2018 ACS Data

According to City of Seattle Office of Planning and Community Development, Rates of housing cost burden in Seattle are higher for renter households than for homeowner households. The prevalence of housing cost burden is especially high:

- among Black renters, nearly 60% of whom are cost burdened, and
- among extremely low-income renters and very low-income renters (with incomes at or below 30% of Area Median Income and 50% of AMI, respectively), roughly 80% of whom are cost burdened.

While overall rates of housing cost burden among renting households have remained relatively steady over the past dozen years, there have been dramatic increases in:

- the prevalence of cost burdens among households with low incomes between 50% and 80% of Area Median Income (AMI),
- and the rate of severe cost burdens among households with very low incomes of 30% to 50% of AMI.

Households losing CoC or ESG rental assistance and households losing protection against evictions present a subset of this low-income population that faces an especially imminent risk of homelessness.

### 3 – Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Stalking, Sexual Assault, or Human Trafficking

A total of 10% of the 2020 homeless population, or 1,211 individuals, report experiencing homelessness for these reasons. About 69% of these individuals are unsheltered (836 people) and 15% have children with them.

This is likely an undercount. Due to the associated stigma and fears, survivors of the many forms of domestic violence, dating violence, stalking, sexual assault, or human trafficking may not choose to report abuse during face-to-face surveys with volunteers. However, the year on year increase can partially be attributed to concerted effort by agencies and service providers to engage families (and thus, women heads of household, who often are present in families with children) in data collection efforts.

About 70% of individuals experiencing both homelessness and domestic violence, dating violence, stalking, sexual assault, or human trafficking are women, and 25% identify as LGBTQIA+/non-heterosexual. American Indians comprise 36% of all those fleeing domestic violence while 40% of those fleeing domestic violence identify as white and 20% as Black or African American.

A January 6, 2022 Seattle Times article reported rising rates of domestic violence, including higher rates of DV-related emergency room visits, referrals for felony charges, and restraining orders. LifeWire – the largest and most prominent organization serving this population – served 1,336 people with housing, legal, and mental health services. Call to domestic violence hotlines increased, as did arrests. Worst, domestic violence-related deaths in King County surged to the highest numbers in at least 25 years, according to the Prosecuting Attorney's Office: 29 deaths in 2020 and 25 in 2021. LifeWire has also been challenged by housing during the

pandemic.

The most recent state level report from the Human Trafficking Institute shows one to three criminal cases regarding human trafficking each year in the entire state of Washington. <https://traffickinginstitute.org/wp-content/uploads/2022/01/2020-Washington-State-Summary.pdf> The National Human Trafficking Hotline – whose data the Port of Seattle and the Seattle Police Department utilize for their anti-human trafficking activities – reported 815 individual contacts (phone, text, online chat, email, and webform, not de-duplicated) that they estimate represent 238 “moderate indicators” for human trafficking, from which they have confidence that 126 people demonstrated “high indicators” as human trafficking victims. Of those estimated cases, less than 2/3 were related to sex trafficking and the balance being various forms of non-sexual forced labor. They estimate 2/3 of victims to be foreign nationals. That is, those with the least legal protection – non-citizens, minors, and sex workers – are the most at risk of human trafficking and forced labor.

The Organization for Prostitution Survivors in its most recent annual report from 2020 stated that they have served 287 individuals in the 7 years since its founding in 2014, including providing direct financial assistance to 47. Of those served, 46% are BIPOC; 54% experience disability; 50% experienced homelessness in the three years before intake and 33% were currently experiencing homelessness; and 50% had interaction with the criminal justice system.  
<https://static1.squarespace.com/static/6144f025de52576ce74dc4df/t/6154a005ff836d5dc3d343a3/1632935976078/2020+Annual+Report.pdf>

#### 4 – In need of services that would prevent homelessness

Housing costs remain the primary driver of homelessness and housing insecurity in Seattle. 76% of all renter households earning 50% AMI or less are cost burdened or severely cost burdened. Overall, in Seattle, there is a shortage of 29,710 units affordable and available to households at or below 50% AMI.

#### **Housing conditions (including overcrowding) – City of Seattle**

Table 3      Lower-Income Renter Households: Housing Unit Problems\*

% of Renters with at Least One Housing Unit Problem
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	≤ 30% HAMFI	> 30% ≤ 50% HAMFI	> 50% ≤ 80% HAMFI
City of Seattle	13%	12%	9%

\* Housing unit problems refer to a unit that lacks plumbing or kitchen facilities or is over-crowded.

Source: CHAS Table 3

Source: CHAS with ACS 2013-2017 data; from City of Seattle Housing Needs Analysis

Additionally, three out of every four students experiencing homelessness are in doubled-up housing situations and they have similarly poor academic outcomes as those living in unsheltered or other types of temporary housing (e.g., hotels, motels, and shelters).

## 5 – Veterans

813 veterans were experiencing homelessness on the morning of the count, about 7% of the overall homeless population. There is a downward trend in veterans experiencing homelessness from 2017 to 2020. In 2020, veterans are sheltered and unsheltered at almost equal rates (51% sheltered and 49% unsheltered). Since 2017, 2020 marked the least bad sheltered rate of 51%.

Of the veteran homeless population, about 80% were male, 57% white, 97% were non-Hispanic, and 92% were 25 and up. About 27% of the veterans experiencing homelessness reported that this was the first time that they were experiencing homelessness. Additionally, 11% of the veterans (compared to 17% of the non-veteran population) identified as LBTQIA+.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
- and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

1 - Currently Homeless

As reported in the most recent Point in Time Count, Seattle is home to approximately 4,400 people experiencing homelessness with shelter, and 3,700 people experiencing homelessness without shelter. It is largely believed that we will see an increased count of people living without shelter as a result of the COVID-19 pandemic, which has negatively impacted thousands of households in Seattle. According to the U.S. Census 2019 ACS 5 year Estimates, 47% of Seattle renter households are cost burdened, paying more than 30% of their income toward rent. The sample size in this ACS Estimate is over 100,000 households. The Regional Affordable Housing Task Force reported that the majority of King County residents living with cost burdens have incomes below 50% of Area Median Income, are disproportionately people of color, and are more often older adults (65 or older) or younger adults (25 or younger). As these numbers demonstrate, Seattle is thousands of affordable homes short of being able to adequately house members of the Qualifying Populations. The City of Seattle is rapidly expanding Permanent Supportive Housing and permanently affordable housing in response to these unmet needs.

The PIT count records individuals' Self-Reported Reasons for Homelessness, which could be more accurately described as precipitating events in a housing market with no options: Losing a job is the most cited reason for homelessness (16%). Alcohol or drug use is the second most cited reason for homelessness (11%). Unsheltered individuals experiencing homelessness cite alcohol and drug use as the reason for their homelessness at twice the rate (14%) as sheltered individuals experiencing homelessness (7%). Mental health issues (8%) and the inability to afford rent (8%) are the next most cited reasons for homelessness across the overall homeless population.

Families with Children Self-Reported Reasons for Homelessness: About 24% of Individuals in Family Households experiencing homelessness say losing their job is the main event that led to their homelessness. Individuals in family households experiencing homelessness cite not being able to afford a rent increase (14%) and family domestic violence (14%) as the second most common reasons they and their family are currently experiencing homelessness.

Chronically Homeless: Self-Reported Reasons for Homelessness: For individuals experiencing chronic homelessness, alcohol or drug use is most reported as the reason they feel they have lost stable housing with 16% reporting this as the reason for their homelessness. Individuals experiencing chronic homelessness cite mental health issues (14%) and lost jobs (13%) as the next two most common reasons for their homelessness.

Unaccompanied Youth & Young Adults: Self-Reported Reasons for Homelessness: Losing a job (13%) is the most cited reason for an unaccompanied youth or young adult becoming homeless followed closely by an argument with family/friend/roommate (12%).

Self-Reported Health of the Homeless Population: The PIT count shows that 54% of individuals experiencing homelessness report suffering from a psychiatric or emotional condition such as depression or schizophrenia. Of those individuals suffering from a psychiatric or emotional condition, 67% state their condition keeps them from holding a job, living in stable housing, or taking care of themselves. Across all health problems, unsheltered individuals experiencing homelessness have higher rates of self-reported health problems when compared to sheltered individuals. For example, the rate of unsheltered individuals suffering from PTSD is 51% compared to 42% of sheltered individuals.

When asked about issues while trying to access services, the most common issues were: Lack of transportation to access a service (29%) and Not having an ID or personal document needed to receive a service (29%). Not knowing where to go for help (28%) and not hearing back after applying for services (20%) were the two next most cited issues experienced when attempting to access services. Additional common barriers to services include not qualifying, issues with program staff, lack of follow through, unwillingness to separate from spouse/partner, strict program rules, unwillingness to separate from pet, and language barriers. 15% of all individuals experiencing homelessness report they have never experienced any issues while trying to access services they need.

## 2 – At imminent risk of homelessness

According to the U.S. Census 2019 ACS 5 year Estimates, 47% of all Seattle renter households are cost burdened, paying more than 30% of their income toward rent. The sample size in this ACS Estimate is over 100,000 households. The Regional Affordable Housing Task Force reported that the majority of King County residents living with cost burdens have incomes below 50% of Area Median Income, are disproportionately people of color, and are more often older adults (65 or older) or younger adults (25 or younger). As these numbers demonstrate, Seattle is thousands of affordable homes short of being able to adequately house members of the Qualifying Populations. The City of Seattle is attempting to expand Permanent Supportive Housing and permanently affordable housing in response to these unmet needs.



With 76% of all renter households earning 50% AMI or less cost-burdened, and a demonstrated shortage of 29,710 homes affordable and available to households at or below 50% AMI, it is clear that the severe shortage of safe, affordable homes as well as rental assistance are the highest priority needs for this sub-population. That suggests the City of Seattle's intent to rapidly create additional permanent supportive housing is the highest priority need while Seattle Housing Authority and King County also allocate emergency housing vouchers and rental assistance.

Households losing CoC or ESG rental assistance or facing eviction now that the moratoria have been removed present an especially imminent risk.

Households losing CoC or ESG rental assistance and households losing protection against evictions present a subset of this low-income population that faces an especially imminent risk of homelessness. Absent additional subsidy, they may likely (re)enter homelessness. Additional permanently affordable homes – such as those that could be built with HOME-ARP support – present a longer-term solution to these risks of homelessness.

### 3 – Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Stalking, Sexual Assault, or Human Trafficking

Lack of housing is cited by the variety of experts above as the major challenge to serving its clients escaping domestic violence, dating violence, stalking, sexual assault, or human trafficking during the pandemic. “We were seeing people who were being pushed out of apartments because they couldn’t afford them because they lost their jobs,” said Wendi Lindquist, a communications specialist. “Then on the other side, we were seeing people coming out of abusive relationships, looking for a new place to go and there was nowhere for them to land.” The organization continues to look for short- and long-term housing options. Currently it has an emergency shelter and a transitional housing site that totals 20 units; all of them are now in use. Some are occupied by moms living alone while they work to gain custody; others typically have one to three children living with them.” These populations also require discretion, confidentiality, physical and mental health care, and other supportive services. As a result of these populations special need for safety, providers specializing in serving them tend to primarily serve these populations or avoid mixing with populations likely to cause physical or psychological harm, such as single men exiting institutions or homelessness.

### 4 – In need of services that would prevent homelessness

Two-third of respondents to the point in time count cited a reason for their homelessness related to the lack of an affordable, safe place to live. That suggests the

City of Seattle's intent to rapidly create additional permanent supportive housing is the highest priority need of anyone living on the edge of homelessness.

Problems cited as causes of homelessness that might be able to be addressed by services to the currently housed but at-risk include: substance abuse, mental health issues, physical health problems, eviction, and foreclosure.

Additionally, people exiting institutions and systems often end up homeless in Seattle. These include people exiting incarceration, refugee resettlement, foster care, in-patient medical stays, and closures of traditional and hotel/motel shelters. Services exist to connect these people to housing to prevent homelessness, but the severe shortage of safe, affordable homes harms the effectiveness of those services.

## 5 – Veterans

Veterans most often report alcohol and drug use (13%) and mental health issues (13%) as the reasons they are homeless. Illness or a medical problem was reported as the main reason for being homeless by 10% of veterans. However, Post Traumatic Stress Disorder (PTSD) usually results in substance abuse and mental health issues, which then cause veterans to be unable to work and lose housing.

Across almost all health challenges, veterans fare worse than the non-veteran population. Most notably, veterans have an overall rate of psychiatric or emotional conditions of 70% and 55% report experiencing PTSD.

Veterans attempting to get help with their mental health – a condition that makes doing anything more difficult – are often faced with challenging bureaucracy and a severe shortage of VA and other resources to assist veterans with mental health.

According to the point in time count, when veterans are asked about their experiences while trying to access services, the most common experiences included not having an ID or personal document (35%) needed to receive a service and lack of transportation to access a service (32%). Not knowing where to go for help (29%) and not hearing back after applying for services (27%) were the two next most cited experiences. Only 16% of all homeless veterans report they have never experienced any issues while trying to access the services they need.

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

**1 - Currently Homeless**

A 2021 Seattle City Council study on shelter capacity found 2,349 permanent shelter beds, with an additional 286 temporary and 215 planned. The pandemic required reductions in shelter capacity to increase social distancing in shelter programs. The 2021 Adopted Budget included \$18 million of Emergency Solutions Grant (ESG) COVID funds to pilot the use of hotels for shelter. Those funds led to the creation of 197 temporary shelter spaces at the King's Inn and Executive Hotel Pacific by April 2021. Combined with the reopening of some shelter beds and the expansion the Council had funded for 2020, total capacity reached 2,436 beds by July 2021, an increase of 152 beds compared to the end of 2019 (see Chart 1). Other acquisitions, such as the new shelter operated by Africatown Land Trust in The Community Home at Keiro, will add permanent shelter capacity for the City, bringing permanent shelter capacity to 2,564.

Seattle Housing Authority received authority for 500 Emergency Housing Vouchers. Affordable and permanent supportive housing developments in Seattle have long wait lists and typically conduct lotteries for affordable units or may lease units through Coordinated Entry for All. Coordinated Entry generally assesses thousands of people each year, and offers housing to a small fraction. There are at least 8,000 people experiencing homelessness and tens of thousands of cost burdened renters in Seattle – additional affordable and permanent supportive housing is desperately needed. As reported in the most recent Point in Time Count, Seattle is home to approximately 4,400 people experiencing homelessness with shelter, and 3,700 people experiencing homelessness without shelter. It is largely believed that we will see an increased count of people living without shelter as a result of the COVID-19 pandemic, which has negatively impacted thousands of households in Seattle.

The top three most used services by individuals experiencing homelessness are: Free meals (58%), Bus passes (41%), and Hygiene services (40%). Sheltered individuals tend to use services more frequently than unsheltered individuals experiencing homelessness. For example, 55% of sheltered individuals report using bus passes while only 34% of unsheltered individuals report using this service. Almost 100% of sheltered individuals report using at least one service compared to 86% unsheltered individuals.

The top three most used services by individuals in family households are emergency shelters (58%) followed by bus passes (51%) and free meals (44%). Almost all families with children are using at least one service (93%). For individuals in family households,

lack of transportation (35%) was the most commonly cited challenge when trying to access services. This reason is followed by not knowing where to go for help (30%) and not hearing back after applying for services (25%).

The most used services by the homeless youth and young adult population are free meals (66%), emergency shelter (48%), bus passes (47%), and day shelter services (47%). When asked about their experiences while trying to access services, the most common experiences cited were not having an ID or personal document needed to receive a service (38%) and lack of transportation to access a service (31%). Not knowing where to go for help (29%) and not hearing back after applying for services (16%) were the next two most cited experiences.

The top three most used services by the chronically homeless are free meals (71%), hygiene services (56%), and day shelter services (50%). Across most services, individuals experiencing chronic homelessness access services at higher rates than those not chronically homeless. About 9% of individuals experiencing chronic homelessness say they are not currently accessing any services.

## 2 – At imminent risk of homelessness

Seattle Housing Authority received authority for 500 Emergency Housing Vouchers. King County continues to try to disburse emergency rental assistance funded by ARPA. City of Seattle still has an eviction moratorium and has been expanding tenant protections from evictions and unreasonable rent increases.

### Cost burden – City of Seattle

<u>Income by Cost Burden (Renters only)</u>	<u>Cost burden &gt; 30%</u>	<u>Cost burden &gt; 50%</u>	<u>Total</u>
Household Income <= 30% HAMFI	27,265	22,150	37,490
Household Income >30% to <=50% HAMFI	17,170	7,855	20,550
Household Income >50% to <=80% HAMFI	13,730	2,380	21,720
Household Income >80% to <=100% HAMFI	6,610	605	16,805
Household Income >100% HAMFI	6,080	200	77,865
<b>Total</b>	<b>70,855</b>	<b>33,190</b>	<b>174,430</b>

Source: CHAS with 2014-2018 ACS Data

### 3 – Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Stalking, Sexual Assault, or Human Trafficking

The lack of affordable, safe housing options is itself a primary risk factor for experiencing domestic violence, dating violence, stalking, sexual assault, or human trafficking. Many people become trapped in abusive situations when they cannot afford to move elsewhere, when they are dependent upon their abuser for shelter. Likewise, homelessness is a pathway to survival sex work and human trafficking, especially for LGBTQ+ minors unable to live with their parents or guardians. One wonders how many cases could be prevented by timely use of emergency housing funds.

LifeWire, YouthCare, Organization for Prostitution Survivors, and other non-governmental organizations connect survivors in King County with housing, legal and mental health services. The Port of Seattle and the Seattle Police Department have anti-trafficking departments and budgets.

When asked to select all services used for the point in time count, more than half of individuals in this category use the following services:

- 72% use free meals
- 58% use emergency shelter
- 57% use bus passes
- 54% use day shelter services
- 51% use hygiene services

### 4 – In need of services that would prevent homelessness

Seattle Housing Authority received authority for 500 Emergency Housing Vouchers. King County continues to try to disburse emergency rental assistance funded by ARPA. In Seattle, COVID financial hardship remains a defense against eviction for 6 months after the expiration of the eviction moratorium, and households facing eviction have a right to counsel.

### 5 – Veterans

A vast majority (94%) of the homeless veteran population report accessing some service, but not the services that would address the causes of their homelessness. The most used services by homeless veterans are free meals (70%) and hygiene services (57%), followed by bus passes (46%) and day shelter services (46%).

There is a severe shortage of mental health resources available to this population, who continue to experience trauma through homelessness rather than beginning on a path to healing and building resilience to live through a life with PTSD. Inaction on homelessness is likely turning PTSD into Complex PTSD for homeless veterans, a result of continually being helpless and restrained when the body enters flight or fight mode and a diagnosis that requires longer intervention focused on repairing relational skills and learning how to manage triggering events.

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

The tremendous lack of homes affordable and available to the qualified populations is both the root cause of the problem as well as a massive hinderance to service-focused strategies relying on connecting clients to housing and shelter. Additionally, Seattle relied heavily on congregate shelter prior to COVID, and roughly half of our neighbors experiencing homelessness are unsheltered. In response to the pandemic, the shelter and housing ecosystem in Seattle/King County has been attempting to rapidly expand Permanent Supportive Housing and non-congregate shelter options, including through opportunistic acquisitions of hotels, motels, and multifamily buildings.

Two-third of respondents to the point in time count cited a reason for their homelessness related to the lack of an affordable, safe place to live. That suggests the City of Seattle's intent to rapidly create additional permanent supporticve housing is the highest priority need of anyone living on the edge of homelessness. Problems cited as causes of homelessness that might be able to be addressed by services to the currently housed but at-risk include: substance abuse, mental health issues, physical health problems, eviction, and foreclosure. Additionally, people exiting institutions and systems often end up homeless in Seattle. These include people exiting incarceration, refugee resettlement, foster care, in-patient medical stays, and closures of traditional and hotel/motel shelters. Services exist to connect these people to housing to prevent homelessness, but the severe shortage of safe, affordable homes harms the effectiveness of those services.

When asked about issues while trying to access services, the most common issues were: Lack of transportation to access a service (29%) and Not having an ID or personal document needed to receive a service (29%). Not knowing where to go for help (28%) and not hearing back after applying for services (20%) were the two next most cited issues experienced when attempting to access services. 15% of all individuals experiencing homelessness report they have never experienced any issues while trying to access services they need. For individuals who say they do not use any services, which

includes 10% of the overall homeless population, feeling unsafe is the most cited reason for not using services. Top reasons include the following: Feeling unsafe (14%) Over-crowdedness/bugs/germs (11%/11%/10%) Not feeling culturally accepted (6%).

As stated above from the 1/6/22 Seattle Times article, LifeWire lack of housing is a major challenge to serving its clients escaping domestic violence, dating violence, stalking, sexual assault, or human trafficking during the pandemic. “We were seeing people who were being pushed out of apartments because they couldn’t afford them because they lost their jobs,” said Wendi Lindquist, a communications specialist. “Then on the other side, we were seeing people coming out of abusive relationships, looking for a new place to go and there was nowhere for them to land.” The organization continues to look for short- and long-term housing options. Currently it has an emergency shelter and a transitional housing site that totals 20 units; all of them are now in use. Some are occupied by moms living alone while they work to gain custody; others typically have one to three children living with them.”

When veterans are asked about their experiences while trying to access services, the most common experiences included not having an ID or personal document (35%) needed to receive a service and lack of transportation to access a service (32%). Not knowing where to go for help (29%) and not hearing back after applying for services (27%) were the two next most cited experiences. 16% of all homeless veterans report they have never experienced any issues while trying to access the services they need.

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

Living in over-crowded housing and staying with friends or family are often the form of housing instability that can escalate to staying in a car, tent, or shelter, as demonstrated by the self-reported causes of homelessness from the point in time count.

Housing costs remain the primary driver of homelessness and housing insecurity in Seattle. 76% of all renter households earning 50% AMI or less are cost burdened or severely cost burdened. Overall, in Seattle, there is a shortage of 29,710 units affordable and available to households at or below 50% AMI. The experience of homelessness or housing insecurity caused by the lack of available, affordable options are major risk factors for human trafficking and for remaining in abusive households.

Individuals Living in Vehicles: Self-Reported Reasons for Homelessness: Losing a job is the most reported reason for experiencing homelessness for individuals living in vehicles. About 26% of individuals cite lost job as the reason they are experiencing homelessness. Other reasons include 14% saying they could not afford rent increase and 9% reporting family domestic violence as the main reason they are currently experiencing homelessness.

The above characteristics are not intended to create a new definition of “other populations” but to respond to the question above. Projects funded with HOME-ARP in Seattle will utilize HUD’s definition of “other populations” through the HOME-ARP Notice Section IV.A 4 despite it not being a category in the authorizing statute.

***Identify priority needs for qualifying populations:***

People without homes need homes. High and rapidly escalating housing costs combined with rapid economic displacement in Seattle create harmful instability for the qualified populations. It is difficult for members of qualified populations to find affordable housing of any kind in Seattle. Whatever personal needs or issues they were facing become exponentially worse on the streets, adding stress to an overwhelmed system and overwhelmed people.<sup>[1][2][3][4][5][6][7][8][9][10][11][12][13][14][15][16][17][18][19][20][21][22][23][24][25][26][27][28][29][30][31][32][33][34][35][36][37][38][39][40][41][42][43][44][45][46][47][48][49][50][51][52][53][54][55][56][57][58][59][60][61][62][63][64][65][66][67][68][69][70][71][72][73][74][75][76][77][78][79][80][81][82][83][84][85][86][87][88][89][90][91][92][93][94][95][96][97][98][99]</sup>

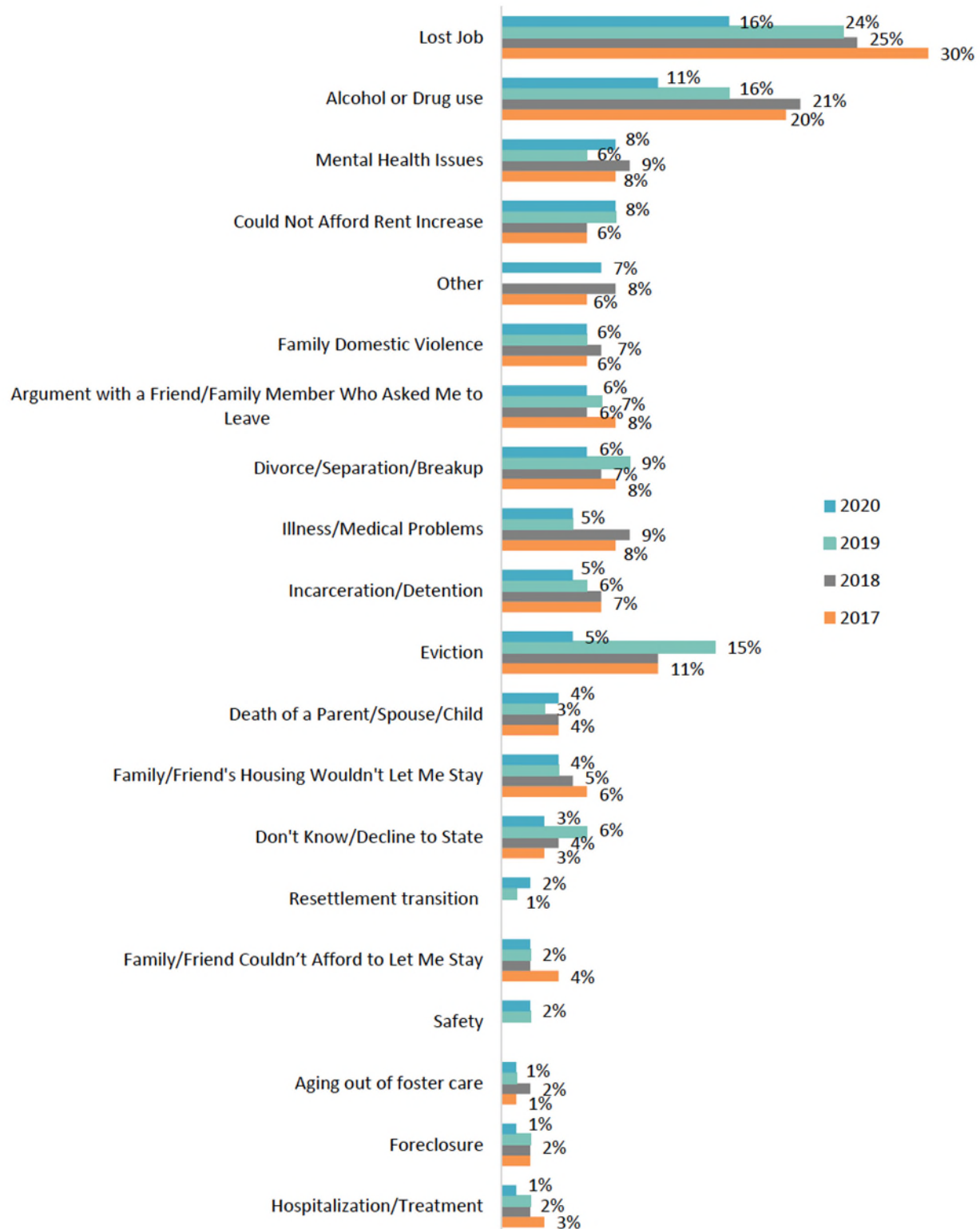
According to the 2020 Point in Time Count, 94% of all individuals experiencing homelessness reported they would move inside safe/affordable housing if available; 21% are employed; and 40% reported economic reasons including job loss, inability to afford rent, eviction, or foreclosure as the primary reason for experiencing homelessness. The top three most used services by individuals experiencing homelessness are: Free meals (58%) Bus passes (41%) Hygiene services (40%). When asked about issues while trying to access services, the most common issues were: Lack of transportation to access a service (29%); Not having an ID or personal document needed to receive a service (29%); Not knowing where to go for help (28%); and not hearing back after applying for services (20%) were the most cited issues experienced when attempting to access services. Data and experience show that investing in permanent supportive housing allows services to be accessed and for individuals to recover. Without safe, quality, affordable housing, our qualified populations are unable to thrive.

**1 – Currently homeless**

The below chart from the point in time count shows self-reported reasons for homelessness. Two-third of respondents cite a reason related to the lack of an affordable, safe place to live. That suggests the City of Seattle’s intent to rapidly create additional permanent supportive housing is the highest priority need.



Figure 23 Self-Reported Reasons for Homelessness (Select All That Apply), 2017-2020



## 2 – At imminent risk of homelessness

With 76% of all renter households earning 50% AMI or less cost-burdened, and a demonstrated shortage of 29,710 homes affordable and available to households at or below 50% AMI, it is clear that the severe shortage of safe, affordable homes as well as rental assistance are the highest priority needs for this sub-population. That suggests the City of Seattle's intent to rapidly create additional permanent supportive housing is the highest priority need while Seattle Housing Authority and King County also allocate emergency housing vouchers and rental assistance.

## 3 – Fleeing or attempting to flee domestic violence, dating violence, stalking, sexual abuse, or human trafficking

One of the primary root causes of these problems is the lack of available, affordable housing options to help people out of these tremendously difficult situations. Other root causes – criminal justice involvement, experiences of child abuse intergenerationally, and the lack of protection for non-citizens – are more difficult to precisely identify and more difficult to address through HUD-funded activities. As stated above, our agencies attempting to serve this population cite a lack of safe, affordable housing as a need of the highest priority. One wonders whether year long delays in providing that housing has allowed cases of domestic violence, dating violence, stalking, sexual abuse, or human trafficking to further harm people who may otherwise have been able to escape.

## 4 – In need of services that would prevent homelessness

Two-third of respondents to the point in time count cited a reason for their homelessness related to the lack of an affordable, safe place to live. That suggests the City of Seattle's intent to rapidly create additional permanent supportive housing is the highest priority need of anyone living on the edge of homelessness. Problems cited as causes of homelessness that might be able to be addressed by services to the currently housed but at-risk include: substance abuse, mental health issues, physical health problems, eviction, and foreclosure. Additionally, people exiting institutions and systems often end up homeless in Seattle. These include people exiting incarceration, refugee resettlement, foster care, in-patient medical stays, and closures of traditional and hotel/motel shelters. Services exist to connect these people to

housing to prevent homelessness, but the severe shortage of safe, affordable homes harms the effectiveness of those services. [L\*U\*]  
[SEP\*SEP]

## 5 – Veterans

As discussed above, veterans also suffer from Seattle's shortage of safe, affordable housing. However, the root causes of many veterans' inability to afford housing relate to a shortage of and barriers to services that would help veterans recover from PTSD and associated substance abuse and mental health issues. Veteran homelessness is the only category of homelessness on decline, however, and it may be thanks to recent focus of the housing system's scarce, inadequate resources on this group.

***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:***

Seattle and King County consistently produce evidence, data, and reports that all point towards the housing shortage as the primary root cause of homelessness and housing insecurity here and that demonstrate investments in permanent supportive housing enhance services by allowing them to be accessed and by allowing individuals safe homes in which to recover.

The \$12.2 million provided by HOME-ARP, with traditional 3:1 leverage, would participate in producing approximately 165 new, affordable homes for the Qualified Populations, up to 22 of which will be HOME funded per subsidy and cost allocation reviews. The remainder of the homes will likely be funded with local and state subordinate debt, LIHTC equity, and permanent debt.

There is an existing shortage of 29,710 homes affordable and available to households at or below 50% AMI; approval of this plan will address 0.56% of that need, but would mean the world for those 165 households, for whom each additional night on the streets creates more harm and risk of worsening health and death. Without safe, quality, affordable housing, none of us are able to thrive.

Sources used in this Plan include:

HUD 2020 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report

Comprehensive Housing Affordability Strategy

(<https://www.huduser.gov/portal/datasets/cp.html>) data previously reported to HUD.

Additionally, we utilized data from 2021 Seattle Council report on shelter capacity (<https://council.seattle.gov/wp-content/uploads/2021/10/Lewis-Report-on-Homelessness-and-Housing.pdf>).

The 2020 point in time count report, Count us In [https://kcrha.org/wp-content/uploads/2020/07/Count-Us-In-2020-Final\\_7.29.2020.pdf](https://kcrha.org/wp-content/uploads/2020/07/Count-Us-In-2020-Final_7.29.2020.pdf)

Seattle Times <https://www.seattletimes.com/seattle-news/the-seattle-area-faces-rising-domestic-violence-rates-this-organization-is-working-to-combat-it/>

2018 Homeless Students by demographic, Office of Superintendent of Public Instruction (Washington State)

U.S. Census 2019 ACS 5 year Estimates;

2021 Market Rate Housing Needs and Supply Analysis  
(Berk) <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/HousingChoices/SeattleMarketRateHousingNeedsAndSupplyAnalysis2021.pdf>

We also referenced the King County Affordable Housing Task Force data (also based on 2013-2017 CHAS data) Dashboard: [Regional Affordable Housing Dashboard - King County](#) Can select Seattle to see jurisdiction data: [Regional Affordable Housing Dashboard - King County](#)

## HOME-ARP Activities

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

The PJ will administer activities directly through the City of Seattle Office of Housing. OH will solicit applications through a new Notice of Funding Availability process and fund projects that quickly and efficiently produce permanent supportive housing and permanently affordable housing serving the qualified populations and other low-income households.

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

n/a

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

#### **Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 12,200,684		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ #	# %	15%
<b>Total HOME ARP Allocation</b>	\$ 12,200,684		

#### ***Additional narrative, if applicable:***

As demonstrated by the data herein, comments from our citizen participation processes, as well as in innumerable other reports, the shortage of permanent, affordable, and/or supportive housing options in Seattle is one of the primary causes of homelessness and the primary impediment to helping individuals and families exit homelessness. Accordingly, the plan to fund eligible activities focuses on the acquisition, construction, preservation, and/or rehabilitation of housing serving the Qualified Populations.

The City of Seattle may also use HOME-ARP funds to capitalize an operating reserve for the 15-year HOME-ARP compliance period. The amount of assistance will be based on the project's underwriting and the total anticipated operating deficit associated with the HOME-ARP units restricted for occupancy by qualifying households in a project where the PJ determines in its underwriting that the reserve is necessary to maintain the HOME-ARP units' long-term operational feasibility.

The City will execute written agreement with the project owner that will specify the amount of the capitalized reserve and the restrictions on its use during the minimum compliance period, including a prohibition on net operating income resulting from HOME-ARP operating cost assistance. The allowable amount of the reserve shall not exceed the amount determined by the City to be necessary to provide operating cost assistance for HOME-ARP units restricted for occupancy by qualifying populations for the 15-year HOME-ARP minimum compliance period.

Any HOME-ARP funds used in a capitalized operating cost assistance reserve will only be permitted to be drawn to address operating deficits associated with HOME-ARP-assisted units. For this purpose, operating costs include: administrative expenses (prorated resident service and property management payroll costs; employee education, training, and travel; advertising; rental or purchase of necessary equipment, supplies, legal charges, bank charges, utilities, telephone/internet services, insurance, and other administrative costs that are reasonable and customary for the general administration of a rental unit occupied by qualifying populations), property management fees, insurance, utilities, property taxes, and maintenance of HOME-ARP-assisted units replacement reserve deposits if the replacement reserve is not initially capitalized with HOME-ARP funds. Operating costs must be reasonable and appropriate for the area, size, population(s) served, and type of project. Unexpended operating cost assistance reserve amounts remaining at the end of the minimum compliance period must be returned in accordance with Section VI.B.24 of the HOME-ARP Notice.

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

As demonstrated by the data herein, comments from our citizen participation process, as well as in innumerable reports by the public, philanthropy, academia, journalists, writers, and non-profits, the shortage of permanent, affordable, and/or supportive housing options in Seattle is the primary cause of homelessness and the primary impediment to helping individuals and families exit homelessness. Accordingly, the plan to fund eligible activities focuses on the acquisition, construction, preservation, and/or rehabilitation of housing serving the Qualified Populations.

## **HOME-ARP Production Housing Goals**

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

The \$12.2 million provided by HOME-ARP, with traditional 3:1 leverage, would participate in producing approximately 165 new, affordable homes for the Qualified Populations by providing roughly 12% of the total cost of those 165 new homes, up to 22 of which will be HOME funded apartments per subsidy and cost allocation reviews. The remainder of the homes will likely be funded with local and state subordinate debt, LIHTC equity, and permanent debt.

There is an existing shortage of 29,710 homes affordable and available to households at or below 50% AMI; approval of this plan will address 0.56% of that need, and would mean the world for those 165 households, for whom each additional night – let alone month - on the streets creates more harm, worse health, and death. During January

2022, homelessness resulted in death for 21 individuals in Seattle. Without safe, quality, affordable housing, none of us are able to thrive.

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

Seattle and its region continue to experience one of the largest housing shortages and its attendant homelessness in the nation. Through its Housing Levy, JumpStart payroll tax, and other locally raised sources, the City aims to accelerate the production of affordable housing, especially for the lowest-income households. That spending is governed by the City of Seattle Housing Levy oversight committee and its published plans. As to HUD funds, the Affordable Housing One Year Goals in the 2021 Annual Action Plan were:

**AP-55 Affordable Housing – 91.220(g) Introduction**

**One Year Goals for the Number of Households to be Supported**

Homeless 254

Non-Homeless 608

Special-Needs 109

Total 971

**One Year Goals for the Number of Households Supported Through**

Rental Assistance 340

The Production of New Units 47

Rehab of Existing Units 30

Acquisition of Existing units 417

Total 971

HOME-ARP Funds allow these goals to be increased by an estimate of 165 new units, as calculated above, to house Qualified Populations and other low-income households.

**Preferences**

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

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

The City of Seattle's original Substantial Amendment stated that the City would not attach tenant preferences to this program. HUD stated that were the City to fund a permanent supportive

housing development with HOME-ARP funds, HUD would count that development as having a preference for households experiencing homelessness and require an additional Substantial Amendment. As such, this section outlines the need for Permanent Supportive Housing to serve Seattle populations experiencing or at-risk of homelessness in order to allow HOME-ARP funds to be used in the construction of Permanent Supportive Housing well in advance of project selection.

As advised by HUD staff, the City of Seattle establishes a preference for those experiencing or at-risk of homelessness as defined in Section 3205 of the American Rescue Plan Act of 2021. The City may use HOME-ARP dollars to assist in funding the construction of Permanent Supportive Housing developments. The City will ensure that selected projects comply with all applicable fair housing, civil rights, and nondiscrimination requirements. Each of the subpopulations highlighted in the HOME-ARP notice – namely the currently homeless, those at imminent risk of homelessness, those fleeing domestic violence, dating violence, stalking, sexual abuse, or human trafficking, those whose homelessness could be prevented with service provision, veterans experiencing homelessness, and the amorphous ‘other’ – could be served by potential Permanent Supportive Housing developments. The City of Seattle will not establish preferences in its policies regarding HOME-ARP funding amongst these many subpopulations of people experiencing or at-risk of homelessness.

Projects funded by these HOME-ARP dollars will use project-specific, fair housing compliant methods to lease to Qualified Populations and other qualifying low-income households.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ’s needs assessment and gap analysis:***

The City would require any applicant proposing potential preferences to serve people experiencing or at-risk of homelessness or subpopulations as described at length in this allocation plan and related statute, regulation, and federal notices to establish a Tenant Selection Plan that specifically identifies how the preference will function and how it will comply with all relevant fair housing requirements.

As detailed in the needs assessment section above, Seattle has massive shortages of housing for households in each of the HOME-ARP subpopulations. The City, the Biden Administration, and supposedly HUD all prioritize Housing First strategies to create safe, stable, affordable homes. Safely housed, people can then address their educational, health, and other needs to build a more stable life. The Seattle metro region includes a number of mission-driven affordable housing developers who have over the years created successful buildings that connect services to specific populations, including individuals in need of services, veterans, those fleeing domestic violence, and families experiencing or at-risk of homelessness. The \$12.2 million HOME-ARP grant will likely contribute to 2 or 3 developments, to be solicited by a future NOFA. There is adequate information on the shortage of affordable housing and the service needs of each sub-population



for the City to be willing to consider a project for funding that establishes a well-defined, well-documented, legal preference to create homes and services for a HOME-ARP sub-population.

Additionally, the needs assessment above demonstrates a large number of unsheltered people currently accessing services. Large, recent bodies of evidence detailed elsewhere in this Substantial Amendment demonstrate that services cannot and do not end homelessness, but that housing people can help them access and successfully benefit from whichever services they may be in need of. As to gap, HUD's generous \$12.2 million will cover roughly 0.56% of Seattle's need for homes affordable and available to households below 50% AMI, including those currently experiencing or at risk of homelessness.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

The City of Seattle will be annually providing approximately \$250 million in local funds in coming years. The City of Seattle has a long track record of funding a variety of projects that serve each of the qualified populations and other low-income households, together or in specialized Permanent Supportive Housing developments. While even that number fails to fully address the unmet needs and gaps of these populations, the City is likely to fund developments that serve the HOME-ARP sub-populations and other low-income households, while simultaneously making the \$12 million available attached to HOME-ARP guidelines and policies governing the project's treatment of qualified populations and others.

## **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

The City does not have any plans to refinance existing debt secured by multifamily housing as described in the question, and therefore we do not have any refinancing guidelines for that

activity.

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

n/a

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

n/a

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

n/a

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

n/a

- *Other requirements in the PJ's guidelines, if applicable:*

n/a