



CITY OF WESTMINSTER
HOME-AMERICAN RESCUE PLAN (ARP)
ALLOCATION PLAN

COUNCIL APPROVED
MARCH 22, 2023

CITY OF WESTMINSTER
GRANTS AND HOUSING DIVISION
8200 WESTMINSTER BOULEVARD
WESTMINSTER, CA 92683

CITY OF WESTMINSTER
HOME-ARP ALLOCATION PLAN

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CITY OF WESTMINSTER

HOME-ARP Allocation Plan

CONSULTATION

Describe the consultation process including methods used and dates of consultation.

The City of Westminster engaged in a consultation process that included meetings with the Orange County Health Care Agency, Office of Care Coordination (local Continuum of Care), which was attended by numerous service agencies that serve homeless, persons at risk of homelessness, seniors, victims of domestic violence, and other qualifying population groups. The City additionally distributed a HOME-ARP questionnaire and received responses from 13 non-profit agencies and 30 Westminster residents. Questionnaires requested the respondent's opinion on the various activities eligible for HOME-ARP funding. The table below outlines all agencies consulted and their feedback.

List the organizations consulted.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Orange County Health Care Agency, Office of Care Coordination	Continuum of Care	Countywide Grantee Meeting on November 17, 2021	Office of Care Coordination staff provided overview of HOME-ARP eligible activities and CoC consultation, including PIT, HIC, and HMIS data.
Various Agencies	Supportive Service Provider	CoC meeting with Westminster on March 31, 2022 to discuss plans for HOME-ARP projects	On March 31, 2022, the following agencies attended the one-on-one consultation meeting between the City of Westminster and the Orange County CoC to go over Westminster's proposed HOME-ARP projects. The following agencies were in attendance: <ul style="list-style-type: none">• Orange County Housing Authority (Public Housing Agency administers federally funded programs to provide rental assistance to qualified tenants in privately owned rental housing)• 2-1-1 Orange County (services for the homeless, at risk of homelessness, veterans, victims of domestic violence)• Brainhealth247 (mental health services)• CalOptima (County- Organized Health System)• Collete's Children's Home• County of Orange

			<ul style="list-style-type: none"> • Covenant House California (transitional and rapid re-housing for transitional age youth) • Families Forward (homeless children and families TBRA and supportive service provider) • EAH Housing (affordable housing not-for-profit organization) • HomeAid Orange County (affordable housing developer for homeless and persons at risk of homelessness) • Human Options (domestic violence services including shelter, housing, legal advocacy, and counseling) • Interval House (domestic violence services, emergency shelters, transitional housing, permanent housing, legal assistance, career development) • Orange County Asian and Pacific Islander Community Alliance (OCAPICA) (serves the Asian and Pacific Islander populations of Orange County through service, education, advocacy, organizing, and research) • Orange County Health Care Agency (homeless, children and family services) • SquareOne Affordable Housing Advocacy & Consulting, Inc (consulting firm specializing in advocacy and affordable housing) • StandUp for Kids (youth homelessness agency offering street outreach, mentoring, and housing) • Volunteers of America Los Angeles (provider of a variety of programs for all qualifying populations)
Love Westminster	Faith Based Coalition	Questionnaire	Love Westminster serves homeless, transitional aged youth, and low-income households. They reported a significant need for all eligible activities under HOME-ARP with the exception of a non-congregate shelter which they reported as having “some” need.
Westminster Family Resource Center	City Department	Questionnaire	The FRC serves approximately 400-500 households with children in Westminster annually, including families that are homeless, at risk of homelessness, victims of domestic violence, and of low-income. Among those activities identified as having a significant need include all housing assistance type of activities (rental

			housing, tenant based rental housing, non-congregate shelter, and housing financial assistance). Also of significant need are services for these population groups – food, housing search, counseling, mental health, case management, and others.
Asian Americans Advancing Justice - OC	Homeless Provider Victims of Domestic Violence Provider Civil Rights Organization Fair Housing Eviction Defense Immigration Legal Services Provider	Questionnaire	Serving approximately 200-300 persons per year, the Asian American Advancing Justice -OC provides a variety of services available to Westminster residents. They found the most significant need in the City to be rental housing, tenant based rental assistance, health, education, and employment services, fair housing, and counseling.
Abrazar, Inc.	Non-Profit Community Center	Questionnaire	Abrazar, Inc. is a local non-profit community center serving all of the qualifying populations in Westminster. Abrazar sees a significant need in the community for rental housing, rental and other forms of housing assistance, employment and life skills services, mental health, transportation, credit repair, street outreach and case management.
Westminster Police Department	City Department	Questionnaire	Working with the homeless, at risk of homeless, and veteran populations of Westminster, the WPD found that the greatest need for these persons is for a non-congregate shelter, mental, substance abuse, and outpatient health services, street outreach, case management, and homeless prevention.
Westminster High School	Public School	Questionnaire	Working with youth in the public school system, Westminster High School staff determined the highest need to be for additional rental housing, tenant based rental housing, non-congregate shelter, education, employment, and life skills services, mental and substance abuse services, services for homeless youth, and homeless prevention.
Stand Up for Kids OC	Homeless Services Provider	Questionnaire	Serving approximately 11 to 20 homeless youth each year in Westminster, Stand Up for Kids found the most need to be for tenant based rental and other housing assistance, education, employment, and life skills services, mental health and substance abuse services, street outreach, case management, credit repair, homeless prevention, and tenant/landlord liaison services.
Human Options	Services for Victims of Domestic Violence	Questionnaire	Human Options serves approximately 80 victims of domestic violence annually in Orange County. They provide domestic violence services including shelter, housing, legal advocacy, and counseling.

			Human Options stated rental housing, non-congregate shelter, childcare, food, health, and various homeless services as a significant need in the City.
Fair Housing Foundation	Fair Housing Agency	Questionnaire	The Fair Housing Foundation assists all of the qualifying population groups in Westminster. Of the highest need are rental housing, tenant based rental assistance, housing financial assistance, employment and legal services.
Boys & Girls Club of Westminster	Non-Profit Agency	Questionnaire	The Boys & Girls Club of Westminster helps all youth in all of the qualifying population groups. They found all of the eligible activities under the HOME-ARP Program to be of significant need in the City. The only service that was labeled as having “some” need were services for HIV/AIDS persons.
Various Residents	Various Residents	Questionnaire	30 Westminster residents completed the HOME-ARP questionnaire where it was reported that mental health, substance abuse, food, housing search and counseling, outpatient health, street outreach, housing financial assistance, and homeless prevention services were reported as the most significant need among the qualifying populations in Westminster.

Summarize feedback received and results of upfront consultation with these entities.

Survey responses from agencies and residents varied considerably from one another. Agencies surveyed reported housing financial assistance and homeless prevention activities as the number one need in Westminster, with rental housing, tenant-based rental housing, and mental health services ranking as the second highest need. On the other hand, residents of Westminster ranked mental health and substance abuse issues as the top two priorities in the community, likely because of the direct influence these matters seemingly have on homelessness.

Public Participation

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

- ***Date(s) of public notice: 2/16/2023***
- ***Public comment period: start date - 2/16/2023 end date - 3/8/2023***
- ***Date(s) of public hearing: 3/22/2023***
***** Public hearing was originally scheduled for March 8, 2023, but was continued to March 22, 2023.***

Describe the public participation process.

The City of Westminster provided two opportunities for the public to participate in the HOME-ARP planning process. The City published a public hearing notice in the Westminster Journal on February 16, 2023 to notify the public of the Plan's availability for review and comment through March 8, 2023, and also to invite interested persons to the public hearing to approve the Plan scheduled for March 23, 2023. The public notice provided the following information to the public: description of the HOME-ARP program; amount of funds allocated to the City of Westminster; eligible activities; and the proposed use of funds.

Describe efforts to broaden public participation.

In an effort to broaden public participation in the development of the HOME-ARP Allocation Plan, the City followed citizen participation steps outlined in its Citizen Participation Plan. For public review, the Plan was made available at the following locations Monday through Thursday (except for legal holidays) from 7:00 a.m. to 5:00 p.m., or otherwise during the Department's normal business hours:

City Hall Public Service Center
City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683

Westminster Senior Center
Community Services Building
City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683

The Plan was also available for citizen review on the City's website at:
www.westminster-ca.gov/home-arp.

Finally, the public was invited to participate in the March 8, 2023 (continued to March 23, 2023) public hearing in person or virtually via Zoom.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

No comments were made on the HOME-ARP Allocation Plan during the public comment period. However, six comments, inclusive of five comments by the Westminster City Council and one

comment by a Westminster resident, were made at the March 23, 2023 public hearing. City Council members questioned the design, funding mechanisms, and other project related questions. The Westminster resident suggested more affordable housing for extremely low-income households. A full description of comments made, and City staff responses can be found in the Appendix to this Plan.

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

All comments made were accepted and responded to.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

HOMELESS									
	Current Inventory					Homeless Population			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV
	# of Beds	# of Units	# of Beds	# of Units	# of Beds				
Emergency Shelter	#	#	#	#	#				
Transitional Housing	#	#	#	#	#				
Permanent Supportive Housing	31	10	#	#	#				
Other Permanent Housing	#	#	48	#	#				
Sheltered Homeless						#	#	#	#
Unsheltered Homeless						16	143	9	#
<i>Current Gap</i>									

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

Housing Needs Inventory and Gap Analysis Table

Non-HOMELESS		
	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	13,255	
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,035	
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,965	
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,235
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,235
<i>Current Gaps</i>		

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:

Homeless as defined in 24 CFR 91.5

The U.S. Department of Housing and Urban Development (HUD) requires that all Continuum of Care jurisdictions across the country complete a biennial unsheltered count and an annual sheltered count of all individuals experiencing homelessness in the community on a single point in time during the last ten days of January. The Orange County PIT was rescheduled to the last 10 days of February due to the COVID-19 pandemic. Orange County's 2022 Sheltered Point in Time (PIT) Count, therefore, took place the night of Monday, February 21, 2022, with client-level demographic information collected from over 100 emergency shelter and transitional housing programs throughout the County. The 2022 Unsheltered PIT Count took place over two days, Tuesday, February 22 through Thursday, February 24, to ensure the 800 square mile county jurisdiction was canvassed effectively. The 2022 PIT Count used the same methodology used for the 2019 PIT, but also incorporated the use of Survey123, a phone application that captures GIS locations and provides very significant information for tabulating, analyzing, and responding to homelessness in Orange County.

City of Westminster and Central Service Planning Area (SPA) Homeless Statistics

The February 2022 PIT count enumerated 159 unsheltered homeless individuals in the City of Westminster that were found to live in places not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. The unsheltered homeless count remained the same as the 2019 PIT; however, the sheltered count dropped from 25 persons in 2019 to 0 in 2022.

Westminster is one of 10 cities that make up the Central Service Planning Area (SPA). The 2022 PIT reported 2,714 homeless persons in the Central SPA – 1,522 unsheltered and 1,192 were sheltered. This is down 19% from the homeless count of 3,332 in 2019, with 1,827 unsheltered and 1,505 sheltered.

Orange County Homeless Statistics

According to the latest full homeless census (2022 Point in Time Count), there were 5,718 homeless persons in Orange County, down 1,142 persons from the 2019 PIT count of 6,860. Of this total 3,057 (53%) were unsheltered, and 2,661 were sheltered (47%). White persons made up 71% of the total homeless population, 12.5% identified as Other or Multiple Races, 8.5% were Black, and 3.4% were Asian. Hispanic or Latinos made up almost 44% of the 5,718 homeless persons. Additionally, there were 280 veterans, 235 transitional age youth (18-24 years old), and 718 seniors.

The 2022 PIT also contained the following important information about the 4,996 individuals (18+ years of age) that are not part of family unit, see below. Of the 4,996 persons, over 48% reported being chronically homeless, and over 67% of these are unsheltered. Also, nearly one-third of the individual homeless population suffer with substance abuse issues (1,633 persons)

and about 75% of them are unsheltered and are likely not being treated. Individuals with mental health or physical disabilities also represent nearly 30% of the individual homeless population each, and majority of these too are unsheltered. This is important because, in general, adults belonging to a family household are more likely to pursue shelter and are less likely to experience disabling conditions experienced by those who are alone and unsheltered.

**Individual Subpopulation and Disabling Conditions Statistics
2022 Orange County Point in Time Count**

	Individuals (Not Part of a Family Unit)		
	Unsheltered Persons	Sheltered Persons	Total %
Homeless Persons 18+ Yrs.	2,936 persons	2,060 persons	4,996 persons
Subpopulation*			
Chronically Homeless	1,617 persons	791 persons	2,408 persons 48.20%
Domestic Violence	289 persons	226 persons	515 persons 10.31%
Disabling Condition*			
Developmental Disability	419 persons	39 persons	458 persons 9.17%
HIV/AIDS	52 persons	77 persons	129 persons 2.58%
Mental Health Issues	867 persons	578 persons	1,445 persons 28.92%
Physical Disability	945 persons	512 persons	1,457 persons 29.16%
Substance Abuse Issues	1,217 persons	416 persons	1,633 persons 33.29%

**Some individuals may identify with more than one subpopulation or disabling condition.*

At Risk of Homelessness as defined in 24 CFR 91.5

To account for persons at-risk of becoming homeless, the most recent (2015-2019) Comprehensive Housing Affordability Strategy (CHAS) data was analyzed. This data contains three particular characteristics of households that meets the definition of “at risk of homelessness” found in 24 CFR Part 91.5. First, the CHAS data breaks down occupied housing units by HUD Area Median Family Income (HAMFI), including 30% and below of HAMFI. Next, the CHAS data provides information on occupied housing units with households that are severely cost burdened; that is, they are spending more than 50% of their income on housing related expenses. For renters, that includes rent and utilities. For homeowners, it includes the mortgage payment, utilities, association fees, insurance, and real estate taxes. And finally, the CHAS data contains information on housing units in which there resides more than 1.5 people per room, which is considered to be severely over-crowded.

The CHAS data shows that of the 13,255 renter households in the City of Westminster, 6,035, or 46%, are occupied by households earning 30% or less of the HAMFI. Further, of these households, 80% (4,840) have one or more housing problems, defined as housing units that: 1) lack complete kitchen facilities; 2) lack complete plumbing facilities; 3) are over

overcrowded; and 4) are cost burdened. A household is said to have a housing problem if they have any one or more of these four problems. The CHAS data shows that Asian households make up an overwhelming share of households that meet both criteria (earn 30% or less of HAMFI and have one or more housing problems) at 65%, with Hispanic households ranked second at 20%, and White households third at 11%. Black or African American households constitute 2% of these households.

With regard to age, 57% of renter households earning less than 30% of the HAMFI and with one or more housing problems fall under the non-elderly category, which represents persons between the ages of 18 and 61. This is the City's working-class households and families. Seniors (62+ years of age), on the other hand, represent the remaining 43% of renter households that are both extremely low-income and have one or more housing problems. This category of seniors has a higher risk of homelessness due to the ever-increasing cost of living in California (rising housing, utility, food, and gas prices) while at the same time living on fixed incomes.

Finally, the CHAS data revealed that of the 6,035 households earning less than 30% HAMFI, 64% (3,855 households) are, in fact, severely cost-burdened, and 6% are severely overcrowded. Severely cost burdened households are spending more than 50% of their income on housing related expenses, leaving the remaining 50% or less of their income available for other daily necessities such as food, gas, child and healthcare. Together, these make up 3,690 households that specifically meet the definition of "at risk of homelessness" at 24 CFR Part 91.5.

Renter-Occupied Housing Units with Households Earning <= 30% HAMFI		6,035	
One or More Housing Problems*		4,840	80%
Race/Ethnicity	White	515	11%
	Black or African American	90	2%
	Asian	3,145	65%
	American Indian or Alaska Native	15	< 1%
	Pacific Islander	10	< 1%
	Other Race/Multiple Races	85	2%
	Hispanic	980	20%
Age	Non-Elderly	2,780	58%
	62-74 Years Old	1,075	22%
	75+ Years Old	985	20%
Housing Problem	Households with No Kitchen or Plumbing Facilities	300	6%
	Households with 1.5+ Persons per Room	375	8%
	Households with 1 – 1.5 Persons per Room	440	9%
	Households Over 50% Cost Burdened	3,115	64%
	Households 30-50% Cost Burdened	605	13%

* 1) lack complete kitchen facilities; 2) lack complete plumbing facilities; 3) are over overcrowded; and 4) are cost burdened

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

The City has seen a substantial increase in domestic violence-related calls for assistance to the Westminster Police Department. From 2011-2015, there was an average of 289 domestic violence-related calls per year while the most recent data (2016-2020) shows an average of 432 calls per year, an increase of 33%, according to the State of California Department of Justice Statistics Center (CJSC) (<https://openjustice.doj.ca.gov/exploration/crime-statistics/domestic-violence-related-calls-assistance>). Another alarming statistic is the increase in the number of domestic violence related calls involving weapons. On average, during the period of 2011-2015, 62 calls involved a weapon, compared to the 2016-2020 period where the average number of calls involving a weapon jumped to 251 per year. The CJSC does not report demographic data for these calls on domestic violence incidences.

The 2022 Orange County Point in Time count reported 129 homeless individuals living in units designated for victims of domestic violence in the Central SPA, which includes the City of Westminster, compared to 104 individuals in 2019. The 2022 Orange County Housing Inventory Count shows no housing projects dedicated to persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking in Westminster; however, in the Central SPA 24 housing units comprising 70 beds for households with children, and 72 beds for households without children are available.

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

Other Families Requiring Services or Housing Assistance to Prevent Homelessness

The HOME ARP Notice (CPD Notice CPD-21-10) describes *Other Families Requiring Services or Housing Assistance to Prevent Homelessness* as currently sheltered households that will become homeless if not for the assistance they are currently receiving. As discussed above, the 2022 Point in Time Count reported 0 sheltered individuals in the City of Westminster.

At Greatest Risk of Housing Instability

Persons at greatest risk of housing instability are those that: 1) are earning 30% or below the HAMFI and are severely cost-burdened (paying 50% or more on housing); or 2) are earning 50% or less of HAMFI and meet one of the following conditions:

1. Has moved two or more times in the two months immediately preceding their application for homelessness prevention assistance.
2. Is living in the home of another because of economic hardship.
3. Has been formally notified of eviction within 21 days after the date of application for assistance.
4. Lives in a hotel or motel and the cost of staying at the hotel or motel is not borne by a federal, state, or local government program.

5. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau.
6. Is exiting a publicly funded institution, or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution).
7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan.

For the first group of persons/households at greatest risk of instability, that is, they earn less than or equal to 30% of HAMFI *and* are severely cost-burdened, the 2015-2019 CHAS data reports that there are 5,040 owner and renter households that meet this criterion. Of these, 76% or 3,855 are households that rent, making them more vulnerable to housing instability and homelessness.

Information on each of the conditions listed above for the second category of persons at greatest risk of housing instability is not readily available, with the exception of data on overcrowding. The 2015-2019 CHAS data described 815 households earning 50% or less of HAMFI living in overcrowded conditions, 77% of which were renter households. Worse, the data showed an additional 685 households experiencing severe overcrowding, and 90% of them were renters.

Veterans and Families that Include a Veteran Family Member

According to the 2021 American Community Survey (ACS), Westminster currently has a population of 2,500 veterans in the city. Information on the number of veterans that are homeless was not available as part of the 2022 Point in Time Count. However, in Orange County, a total of 280 homeless veterans were counted. Of this, 145 were unsheltered and 135 were sheltered. Review of the 2022 Orange County Housing Inventory Count listed no specific housing for veterans in Westminster.

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.

The City of Westminster is a recipient of the annual Community Development Block Grant (CDBG) and HOME Investment Partnership Act Program (HOME). Together, the City receives approximately \$1.5 million from these entitlement programs to address affordable housing and low- and moderate-income community development needs. The City also received a special allocation of CARES Act CDBG in 2019 as a response to the COVID-19 pandemic in the sum of almost \$1.34 million.

Westminster uses its federal funding on a variety of projects and programs that serve the qualifying populations already. For example, the CDBG program funds some supportive services for qualifying populations. The Senior Outreach Center and the Home Delivered Meals Program provide various forms of assistance to Westminster's elderly population, most of which are

extremely low to low-income residents. Services include free classes, referrals, food, and meals delivered to the homes of seniors. The Family Resource Center also provides much needed services to families with children. Recipients of this program are connected with providers of free food, rental assistance, youth programs, parenting classes, financial management classes, and other critical services that help to prevent homelessness. CDBG funds are also eligible to be used for other supportive services not currently funded such as homeless services, operations of homeless facilities, childcare, mental and general health, substance abuse, and employment training for persons who are homeless or at risk of homelessness. CDBG funds may also be used for the development of public facilities including those that serve the various qualifying populations.

The City's HOME program has historically been used for the development of affordable housing and residential rehabilitation. Since 2015, 14 affordable rental housing units were added to the City's HOME-funded housing inventory. The units were made available to low- and moderate-income Westminster families. Home improvement grants and loans were also made available to income-eligible Westminster households to make necessary health and safety repairs that would have otherwise gone unrepaired but for the City's assistance. HOME funds continue to be the primary source of funding for the development of affordable and permanent rental housing that could be made available to households within the qualifying populations.

The third federal funding source was a one-time special allocation of CDBG funding from the Coronavirus Aid, Relief, and Economic Security (CARES) Act. Westminster received \$1.34 million which was used for a range of services to assist households affected by COVID-19. The City funded a tenant-based rental assistance program with nearly \$1 million. The program prevented 221 households from entering homelessness when they suffered income losses caused by COVID-19. CDBG-CV funds are allocated to the Westminster Homeless Rapid-Rehousing Program which provides overnight motel/hotel stays, food, bus tickets, and other necessary costs to help homeless persons from being exposed to COVID-19. Assistance is temporary, but critical. CDBG-CV funds are also being used for the Senior Center COVID-Relief Program which provides meals to elderly persons who fear contracting COVID-19 by attending congregate meal sites. Remaining CDBG-CV funds are currently being allocated to a food assistance program for low- and moderate-income households.

The City of Westminster is also the recipient of two State-funded housing revenue sources: the Supplemental Educational Revenue Augmentation Fund (SERAF) and the Permanent Local Housing Allocation (PLHA). SERAF was recently used on two permanent supportive housing projects benefiting homeless persons. In April 2018, the Westminster Housing Authority (WHA) executed a loan agreement with developer Meta Housing Corporation for \$5.5 million in SERAF funds. The funds were utilized for the construction of 65 new apartments affordable to households with a mix of extremely low-, very-low-, and low-income levels. Westminster Crossing, located at 7122 Westminster Boulevard, also includes 20 permanent supportive housing units for chronically homeless persons, with partnered funding from the County of Orange. The project helps to address the lack of safe, spacious, and well-amenitized affordable rental housing in Westminster.

The WHA also executed a loan agreement with developer, Affirmed Housing Group, for \$2.4 million of SERAF funds to develop Della Rosa located at 14800 Beach Boulevard. The project

entailed 50 new apartments affordable to households with a mix of extremely low-, very low-, and low-income levels. The units are within easy walking distance to transit and some retail, and less than a mile from schools, a grocery store, banks, parks, and a library. The County of Orange partnered in the project, committing 25 project-based vouchers for homeless persons and \$1.2 million in funding.

The California Legislature approved Senate Bill 2 (SB 2), known as the Building Homes and Jobs Act (Act), which established a \$75 recording fee on real estate documents to increase the supply of affordable housing. The Act established the Permanent Local Housing Allocation (PLHA) program administered by the California Department of Housing and Community Development (HCD). The PLHA provides a permanent source of funding to cities and counties to help meet the unmet need for affordable housing and increase the supply of affordable housing units. On August 12, 2020, the Westminster City Council approved the use of Permanent Local Housing Allocation Program funds to implement the Westminster Tenant-Based Rental Assistance (TBRA) Program. The main goal of the TBRA Program is to assist households experiencing or at risk of experiencing homelessness achieve self-sustainability via rental assistance and supportive services. A qualified service provider, Interval House, administers the housing and supportive services components of the TBRA Program. The primary sources of referrals come from, but are not limited to, the Westminster School District, the Westminster Family Resource Center, and the Westminster Police Department to focus assistance on Westminster households that fall under the definition of homelessness or at risk of homelessness.

Finally, the City of Westminster has an Affordable Housing Program consisting of multifamily apartment complexes throughout the City that include affordable units. The City has agreements with the owners of these units to maintain rents at levels below regular market rent rates. In total, the City currently has a portfolio of 213 rental units affordable to family households, 377 units affordable to Westminster seniors, and 59 single room occupancy units.

Affordable and permanent supportive housing developments in Westminster have long wait lists for entry. The Orange County Coordinated Entry generally assesses thousands of people each year, and offers housing to a small fraction. With 159 people experiencing homelessness and hundreds more experiencing rental cost burden, additional affordable and permanent supportive housing is desperately needed for all of the qualifying populations. The 2021-2029 Regional Housing Needs Allocation (RHNA) for the City of Westminster echoes this sentiment. The RHNA reports that the City of Westminster has a total housing need of 9,759 units (updated July 2021). After credits for units constructed or under construction (469), approved units (127), and projected accessory dwelling units or junior accessory dwelling units (528) are taken into consideration, the City of Westminster has a remaining 2021-2029 RHNA of 8,635 units. From this allocation, the RHNA designates:

- 1,729 units affordable to extremely to very low-income households
- 1,202 units affordable to low-income households
- 1,626 units affordable to moderate-income households
- 4,078 units affordable to above moderate-income households

Describe the unmet housing and service needs of qualifying populations:

The greatest unmet housing needs of qualifying populations are:

- Permanent rental housing that is affordable to qualifying and other populations; and
- Permanent supportive rental housing that coordinates specialized services with housing that is affordable to qualifying and other populations.

The greatest unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, or other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- Case management
- Childcare
- Education services
- Employment assistance and job training
- Meal or grocery assistance
- Housing search and counseling assistance
- Coordinated service linkage
- Legal services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Credit repair
- Landlord-tenant liaison services
- Services for special populations, including trauma-informed services
- Financial assistance to secure stable housing, such as rental application fees, security and utility deposits, and first and last month's rent

Homeless as defined in 24 CFR 91.5

Many factors contribute to homelessness including poverty, unemployment, and the lack of affordable housing. Compounding this are personal challenges such as mental and substance abuse disorders, trauma and violence, domestic violence, serious illness, divorce, death of a family member, or disabilities. The 2022 Point in Time reports that the City of Westminster has 159 unsheltered homeless in the City. While the City does have 86 designated year-round beds available for homeless persons pursuant to the 2022 Housing Inventory Count maintained by the Orange County Continuum of Care, none are vacant and available for the 159 homeless persons. This creates an unmet housing need for additional rental units for the City's homeless population. Further, wrap around services to support homeless persons newly housed help to make the transition successful and permanent.

At Risk of Homelessness as defined in 24 CFR 91.5

According to the 2015-2019 Comprehensive Housing Affordability Strategy (“CHAS”), of the 13,255 renter households in the City, 34% (4,485 households) are paying the normal or expected 30% or below of their income on housing related expenses; however, that means that the remaining 66% of all renter households are experiencing some level of cost burden. The cost burdens are more serious for households with the lowest incomes (at or below 30% of Area Median Income). Of the 6,035 renter households earning less than or equal to 30% AMI, 4,660 of them (77%) are cost burdened (paying more than 30% of their income toward rent), and 64% of them are severely cost burdened (paying more than 50% of their income toward rent) making them more at risk of homelessness. These significant housing cost burdens affect thousands of Westminster residents; and with an inventory of only 649 affordable units in the City, there exists an exponential shortage of housing options for those at risk of homelessness. It is critical that the City continue developing new affordable housing for people with the lowest incomes in the community. Free supportive services in the areas of childcare, transportation, and food could greatly relieve those at risk of homelessness by making more of their income available for rising rental costs. Additional funding towards tenant based rental assistance could also be of considerable benefit to those cost burdened households at risk of homelessness.

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

As stated earlier in this report, the number of domestic violence related calls has increased in the last five years to an average of approximately 432 calls per year. Half of these calls reportedly involved the use or threatened use of a weapon. To keep these victims safe, it is imperative that there be sufficient programs and housing shelters available to help them.

The 2022 Orange County Point in Time count reported 129 homeless individuals living in units designated for victims of domestic violence in the Central SPA, which includes the City of Westminster. The 2022 Orange County Housing Inventory Count shows no housing projects dedicated to persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking in Westminster; however, in the Central SPA 24 housing units comprising 70 beds for households with children, and 72 beds for households without children are available.

While not funded by the City of Westminster directly, a number of agencies serving this qualifying population exist in nearby cities of Garden Grove, Tustin, Anaheim, and Long Beach.

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

Persons/households at greatest risk of instability, that is, they earn less than or equal to 30% of HAMFI and are severely cost-burdened, total 5,040 owner and renter households, according to the 2015-2019 CHAS. Of these, 76% or 3,855 are households that rent, making them more vulnerable to housing instability and homelessness. The 2015-2019 CHAS data also described 815 households earning 50% or less of HAMFI living in overcrowded conditions, 77% of

which were renter households. Worse, the data showed an additional 685 households experiencing severe overcrowding, and 90% of them were renters.

Veterans also fall within the “Other Qualifying Populations” category. While the number of homeless veterans in Westminster is not available, the American Community Survey does report 2,500 veterans in the City; however, review of the 2022 Orange County Housing Inventory Count listed no specific housing for veterans in Westminster.

With the thousands of severely cost burdened, overcrowded, severely overcrowded, and veteran households in the City, a priority need for additional affordable rental housing exists. Supportive services such as childcare, transportation, food, employment training, and tenant based rental assistance could benefit these households as well.

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

Shelter Gap

According to the 2022 Orange County Point-In-Time count, there were 159 homeless individuals experiencing homelessness in the City of Westminster. As described earlier in this Plan and pursuant to the 2022 Housing Inventory Count, the City does have access to 86 year-round beds, however the beds are not vacant. In June 2022, the Cities of Garden Grove, Fountain Valley and Westminster entered into a Memorandum of Understanding to acquire and develop a future Navigation Center located in the City of Garden Grove. The Navigation Center will comprise of 85 beds to provide emergency housing and wrap-around services to individuals experiencing homelessness and construction is expected to be completed in late 2023. Approximately 22 shelter beds are expected to be made available to Westminster individuals experiencing homelessness. In total, approximately 108 shelter beds may be available which leaves an estimated need for 51 (159 minus 108) additional shelter beds to address the shelter gap. The City continues to work with the County, neighboring Cities and homeless service providers to close the gaps in the number of unsheltered homeless in Westminster and Orange County.

Tenant-Based Rental Assistance Gap

As described in the Housing Needs Inventory and Gap Analysis Table, there is an estimated gap of 3,611 renter household not covered by a tenant-based voucher. To address the severe housing problems via rental assistance and supportive services, the City of Westminster implemented a TBRA Program utilizing \$400,000 in HOME funds which helped approximately 38 households.

Tenant-Based Rental Assistance Gap		
Renter Households experiencing severe housing problems	OCHA Housing Choice Vouchers + TBRA	Gap
5,470	1,859	3,611

The City continues to participate in the Orange County Housing Authority’s (OCHA) Housing Choice Vouchers program to provide rent subsidies to very-low-income households. Westminster

does not own or manage public housing. It is anticipated OCHA will continue to provide rental assistance to approximately 1,821 Westminster renter households.

Affordable Rental Housing Gap

As identified in the Housing Needs Inventory and Gap Analysis Table, there is an estimated gap of 2,530 affordable rental units to renter households with income less than 50% AMI. Permanent supportive rental housing is a subset of the affordable rental housing gap, primarily for households with income less than 30% AMI.

Affordable Rental Housing Gap		
Rental Units Affordable to HH less than 50% AMI	Renter Households less than 50% AMI w/1 more severe housing problems	Gap
8,000	5,470	2,530

Service Delivery System Gap

The Westminster HOME-ARP Needs Survey and consultation with the various agencies experienced in serving homeless, persons at risk of homelessness, seniors, victims of domestic violence, and other qualifying populations indicated service delivery system gaps including case management, in-school prevention services, mental health and substance abuse services, homeless prevention, housing search and counseling, landlord/tenant liaison services, and housing financial assistance.

As presented earlier in this Plan, the number of individuals and families that meet the criteria of a qualifying population under the HOME-ARP guidance exceeds the number of available units to house them. The City has 159 homeless individuals when last counted in 2022, all of which are unsheltered. The number of homeless reveals the need for additional housing units, along with services to support them. Moreover, the thousands of renter households that are both living in poverty and are severely cost burdened or severely overcrowded are indications of the serious deficit of homes affordable and available to all of the qualified populations, including victims of domestic violence and veterans. This housing shortage in Westminster demonstrated by the CHAS and RHNA data, shows the dire need for additional homeless housing opportunities such as emergency shelters, permanent supportive housing, and non-congregate shelter options, including through opportunistic acquisitions of existing multifamily buildings, hotels, and motels.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here.

Not applicable.

Identify priority needs for qualifying populations:

Analysis of the 2022 Point in Time Count, CHAS data, American Community Survey data, and consultation with the various agencies conducted as part of this Plan reveal the need for more affordable housing and housing-related supportive services for all qualifying populations. People without homes, need homes. The high and rapidly escalating housing costs combined with the COVID-19 pandemic and economic displacement in Orange County creates harmful instability for the qualified populations. It is difficult for members of the qualified populations to find affordable housing of any kind in Westminster. Personal needs and challenges become exponentially worse if you are in poverty, or worse, homeless. Investing in any kind of housing (transitional, permanent, non-congregate shelter) allows services to be accessed and for individuals in all qualifying populations to begin to recover.

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

The City of Westminster analyzed several data sources to determine the needs and gaps in the City's shelter and housing inventory and in the service delivery systems. First, the City extracted Westminster-specific data, Central SPA data, and Orange County data from the 2022 Orange County Point in Time Count. The PIT provided valuable data on the number of sheltered and unsheltered homeless, families and individual homeless persons, and transitional aged youth, senior, and veteran homeless persons. Further, data on the number of homeless persons fleeing domestic violence was provided on a countywide basis.

Next, the City accessed data from the Comprehensive Housing Affordability Strategy ("CHAS"). CHAS data is provided annually from the U.S. Department of Housing and Urban Development (HUD) and includes custom tabulations of American Community Survey (ACS) data from the U.S. Census. The data demonstrates the extent of housing problems and needs, particularly for low-income households. CHAS data was used by Westminster to determine housing tenure by the various income levels, the number of households experiencing cost burden and/or overcrowded conditions, race and ethnicity statistics of extremely low-income households, and other data needed to characterize households at risk of homelessness.

Third, the City retrieved data from the City's 2020-2024 Consolidated Plan, the Regional Housing Needs Allocation (RHNA), and the Orange County Housing Inventory Count to gather information on housing needs, current housing available in Westminster, and current service programs offered with federal and state funding.

Finally, the City consulted with various stakeholders via virtual meetings and through a homeless questionnaire that was completed by 13 different agencies and 30 Westminster residents. Stakeholders included the Orange County CoC, the Fair Housing Foundation, Families Forward, Interval House, Volunteers of America Los Angeles, 2-1-1 Orange County, Abrazar, Inc., StandUp for Kids, Westminster High School, the Westminster Police Department, and more to find out what they felt are the priority needs of their clientele (homeless persons, veterans, elderly persons, persons with disabilities, and victims of domestic violence).

Overall, the City found that the highest need for the qualifying populations in Westminster was for additional affordable housing with wrap-around supportive services. A decent and affordable place to live, coupled with supportive services, helps homeless and those at risk of homelessness by freeing them from such physical and mental hardships and placing them on a path of new opportunity and increased confidence and self-reliance. This finding was determined by review of statistical data that reveals a significant shortage of rental housing for homeless persons and those at risk of homelessness. The results of the questionnaires completed by non-profit agencies that work directly with the qualifying populations found that housing financial assistance and homeless prevention activities were the number one need in Westminster, with rental housing, tenant-based rental housing, and mental health services ranking as the second highest need. Residents of Westminster ranked mental health and substance abuse issues as the top two priorities in the community, likely because of the direct influence these matters seemingly have on homelessness.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The City of Westminster is proposing to utilize HOME-ARP funding to support the development of new affordable rental units. The City released a Request for Proposals in November 2022 and received one response from the local Community Housing Development Organization (CHDO), American Family Housing (AFH). AFH is proposing to acquire property located at 14125 Goldenwest Street, Westminster and develop a new construction project with 28 one-bedroom units. Approximately nine units will be HOME-restricted to low- and moderate-income households earning 60% or below of area median income, and 18 units will be HOME-ARP restricted to persons experiencing homelessness. The project proposes to include open space, a gym, and a recreation/community room where tenants can receive free wrap around services. Wrap around services, at a minimum, could include onsite counseling, financial literacy, healthy living, resume assistance, and job search. Further, the project will include office space for staff of supportive service providers. The project will meet GreenPoint Rater standards for a sustainable, efficient, durable, and healthier home.

Describe whether the PJ will administer eligible activities directly:

The City of Westminster will not administer eligible activities directly. The City, as the participating jurisdiction, and will be responsible for this HOME-ARP Allocation Plan, as well for awarding the HOME-ARP funding to American Family Housing, a local CHDO who will act as lead agency for the 14125 Goldenwest St. Affordable Housing Project. The City's role will be to provide oversight and technical assistance for development and construction activities; however, AFH as lead agency will administer the new affordable housing development project directly.

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

The City of Westminster is not proposing to allocate any HOME-ARP funding to the administration activities. The entire grant of \$1,613,107 will be awarded to the lead agency, American Family Housing, for the development of the 14125 Goldenwest Street Affordable Housing Project. Administrative and planning activities associated with the HOME-ARP grant and eligible activities will be funded with administrative funds from the City's HOME entitlement program.

In accordance with Section V.C.2. of the Notice (page 4), 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.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,613,107		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 0	0 %	15%
Total HOME ARP Allocation	\$ 1,613,107		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The needs assessment and gap analysis show that there are 159 homeless persons in Westminster coupled with thousands of households who are at risk of homelessness due to extremely low incomes and high rents leaving little to fund other necessary costs such as food, gas, and health care. Westminster has insufficient housing that is both affordable and available for these qualifying populations. Therefore, the City has identified the development of affordable rental housing as a priority need in Westminster. Further, there is a need for wrap around supportive services to assist qualifying populations to be more successful in stable housing. The City of Westminster has opted to use \$1,613,107 in HOME-ARP to help alleviate this growing problem.

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:

The City continues to make a considerable effort to increase its inventory of affordable housing units. The City developed 14 new units between the years of 2015-2020, and also assisted over 200 families with tenant based rental assistance in 2020 and 2021. However, the demand for the available units far outstrips the supply as shown in the tables above. Based on the Point in Time Count, there were 159 total homeless persons in Westminster in 2022, all of which were unsheltered despite the efforts of the City, County, and non-profit industry to house and provide needed support services to them. Additionally, there are nearly 4,000 renter households at risk of homelessness. They are reportedly making equal to or less than 30% HAMFI while at the same time, spending over 50% of their incomes on housing related expenses. The RHNA further indicates a need for 1,729 units for extremely to very low-income families, and 1,202 units for low-income households.

In regard to emergency shelter beds, none exist in Westminster, however 866 shelter beds exist in the Central Service Planning Area which includes the cities of Costa Mesa, Fountain Valley, Garden Grove, Newport Beach, Huntington Beach, Santa Ana, Seal Beach, Tustin, and

Westminster. In June 2022, the Cities of Garden Grove, Fountain Valley and Westminster entered into a Memorandum of Understanding to acquire and develop a future Navigation Center located in the City of Garden Grove. The Navigation Center will comprise of 85 beds to provide emergency housing and wrap-around services to individuals experiencing homelessness.

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:

Westminster has solicited proposals from qualified Community Housing Development Organizations (CHDO's) to develop a new affordable rental housing project in the City. The Request for Proposals was released in November 2022 and at the end of January 2023, one proposal was received (and selected) from American Family Housing (AFH), the City's local community housing development organization (CHDO). The proposal includes the acquisition of property located at 14125 Goldenwest Street, demolition, and new construction of 28 one-bedroom units, 27 of which will be made available through the Orange County Coordinated Entry System to persons:

- Experiencing homelessness.
- At risk of homelessness.
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking.
- At greatest risk of housing instability; or
- Needing supportive services or assistance to prevent homelessness.

Amenities will include an outdoor garden space, gym, onsite offices for wrap around supportive service providers, and a recreation room with computers for all tenants to enjoy.

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

In partnership with American Family Housing, approximately 28 units of affordable rental housing units and one manager's unit will be developed. The production of these units will address Westminster's priority need of developing more affordable housing for persons:

- Experiencing homelessness.
- At risk of homelessness.
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking.
- At greatest risk of housing instability; or
- Needing supportive services or assistance to prevent homelessness.

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:

The City of Westminster does not intend to give preference exclusively to one or more of the qualifying populations. Persons experiencing homelessness, are at risk of homelessness, are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking, persons at greatest risk of housing instability, or those persons needing supportive services or assistance to prevent homelessness are all eligible to apply for tenancy at the 14125 Goldenwest Street Affordable Housing Project.

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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City will not give preference to any one qualifying population. The project will utilize the Coordinated Entry System approved by the Orange County Continuum of Care Board which includes a standardized assessment process to ensure that people with the most service needs and levels of vulnerability are prioritized for tenancy at the 14125 Goldenwest Street project before those with less service needs and lower levels of vulnerability. This process ensures that the neediest persons among the homeless, at risk of homelessness, victims or domestic violence, persons at greatest risk of housing instability, or needing continued supportive services to prevent homelessness are given priority at the project.

The Coordinated Entry System (CES) will help to address the unmet need and gap in housing affordable to the qualifying populations as described in the City's needs assessment and gap analysis. The needs assessment and gap analysis show the highest need is for additional rental housing. Thousands of Westminster renter households are earning less than 30% AMI and are paying over 50% of their extremely low income on housing related expenses. There are also 159 homeless persons living in Westminster that do not have a home. All of these households are eligible to receive the CES assessment and could be eligible to occupy restricted units at the 14125 Goldenwest Street Project.

Additionally, the American Family Housing teams are experts in providing comprehensive services to homeless individuals and families, so that residents can achieve stability and contribute to their community. AFH will offer Life Skills, Health and Wellness workshops to all residents annually, free of charge. Monthly calendars will be posted in the community area and are provided to all residents. Participation is voluntary and AFH offers a wide array of services to meet the unique needs of the residents. Services include substance abuse and mental health counseling, budgeting and tenant education, community reintegration, in home life skills, employment training and volunteer activities, and linkage to healthcare and other mainstream entitlements and programs. All services are targeted at ensuring the long-term housing success of each individual. Life Skills, Health and Wellness workshops also may include art therapy, walks in the parks, yoga,

meditation, financial services such as money management and credit counseling, parenting classes, and essential life skills classes focused on topics such as health, hygiene, nutrition, and meal preparation. Parent/child interaction, parental disciplinary practices and child developmental stages are also included as training and are provided for the non-custodial parent who may seek to recover custody of their children. AFH encourages and facilitates the reunification process by assisting with navigating the court process and attending court hearings.

These services will help to meet the need for all qualifying population groups.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

The referral method to be utilized at this project is still to be determined. The City of Westminster will work with American Family Housing to develop a referral mechanism to ensure that priority is given to households who are homeless. Second priority will be given to any of the other qualifying populations.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

The City of Westminster requires that assisted units be filled with tenants who are prioritized through the Coordinated Entry System (CES) and eligible to receive HOME-ARP assistance including households who are:

- Experiencing homelessness.
- At risk of experiencing homelessness.
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking.
- At greatest risk of housing instability; or
- Needing supportive services or assistance to prevent homelessness.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

CES is a critical component to any community's efforts to meet the goal of the Federal Strategic Plan to Prevent and End Homelessness. U.S. Department of Housing and Urban development's primary goal for CES processes are that assistance be allocated as effectively as possible and as easily accessible no matter where or how people present. CES paves the way for more efficient homeless assistance systems. It will reduce the amount of time people spend before finding the right housing match; and reduce new entries into homeless by consistently offering prevention and diversion resources upfront, and it will improve data collection and quality thus providing accurate information of what type of assistance is needed in our community. Prioritization and case conferencing will be used to refer individuals and families who are the most appropriate and eligible referral to the available resources.

The Orange County Continuum of Care CES is managed by the County of Orange and includes a vast network of service providers serving as access points for people experiencing or at risk of experiencing homelessness in Orange County. CES is for anyone experiencing or at risk of experiencing homelessness in Orange County including young adults, single adults, couples, families, veterans and seniors. For more information about CES in Orange County, please visit: <https://ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system> and refer to the attached CES workflow.

All applicants will be selected for HOME-ARP assistance using the CES prioritization approved by the Orange County Continuum of Care Board. The CES prioritization is determined using a standardized assessment process to ensure that people with the most services needs and levels of vulnerability are prioritized for housing and services before those with less severe service needs and lower levels of vulnerability. The CES policies and procedures, including prioritization policies, are available here: <https://ceo.ocgov.com/care-coordination/homeless-services/coordinated-entry-system>. For questions regarding the Coordinated Entry System, please contact coordinatedentry@ocgov.com.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not applicable. The City of Westminster will only use the Coordinated Entry System utilized and approved by the Orange County Continuum of Care Board as described above.

Limitations in a HOME-ARP Rental Housing or NCS Project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of Westminster does not intend to limit tenancy in a HOME-ARP funded affordable housing project to any of the qualifying populations; however, priority will be given to persons experiencing homelessness and households earning under 60% area median income. Any vacant units may be made available to the other qualifying populations.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable. The City of Westminster does not propose to implement any limitations for participation in any HOME-ARP funded projects.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable.

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*

Not applicable. The City of Westminster does not intend to use HOME-ARP funds on refinancing any existing debt secured by multifamily rental housing.

- *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.*

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



APPENDIX A

HOME-ARP CERTIFICATIONS

HOME-ARP CERTIFICATIONS

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

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

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

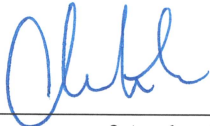
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

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

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

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



Signature of Authorized Official

3/22/2023

Date

Christine Cordon, City Manager

Title



APPENDIX B

APPLICATION FOR FEDERAL ASSISTANCE (SF 424) FOR HOME-ARP PROGRAM

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

M-21-MP-06-0556

5a. Federal Entity Identifier:

95-6005897

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Westminster

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

95-6005897

* c. UEI:

M3QQN2CCJ7P7

d. Address:

* Street1: 8200 Westminster Boulevard

Street2:

* City: Westminster

County/Parish:

Orange

* State: CA: California

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 92683-0000

e. Organizational Unit:

Department Name:

Community Development Depart.

Division Name:

Grants & Housing Division

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

Prefix:

Mr.

* First Name:

Adolfo

Middle Name:

* Last Name:

Ozaeta

Suffix:

Title: Assistant City Manager

Organizational Affiliation:

City of Westminster

* Telephone Number: (714) 548-3178

Fax Number:

* Email: AOzaeta@Westminster-CA.gov

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME-ARP helps individuals/households who are homeless, at risk of homelessness, and other vulnerable populations with housing, rental assistance, supportive services, and NCS to reduce homelessness.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,613,107.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,613,107.00"/>

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

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

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

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ ** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:



APPENDIX C

ASSURANCES – CONSTRUCTION PROGRAM (SF 424-B) FOR HOME-ARP PROGRAM

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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


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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Westminster	DATE SUBMITTED 03/22/2023



APPENDIX D

ASSURANCES – CONSTRUCTION PROGRAM (SF 424-D) FOR HOME-ARP PROGRAM

ASSURANCES - CONSTRUCTION PROGRAMS

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

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

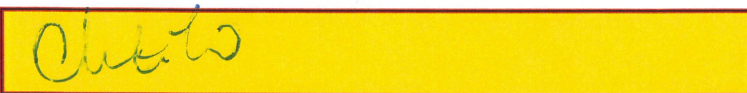
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Westminster	DATE SUBMITTED 03/22/2023



APPENDIX E

PROOF OF PUBLICATION

City Hall's Front Public Service Counter
Westminster City Hall
8200 Westminster Boulevard Westminster Community Services & Recreation
Westminster Community Services Building
8200 Westminster Boulevard
Westminster, CA 92683

Residents are invited to participate in the virtual public hearing and present their comments and/or write the City of Westminster, Grants and Housing Division, at 8200 Westminster Boulevard, Westminster, California, 92683 before the City Council meeting on April 28, 2021. A copy of the FY 2021/22 Annual Action Plan can be accessed online at www.westminster-ca.gov or can be mailed or emailed to you upon request. Please contact Michael Son, Housing Specialist at (714) 548-3170 or via email at MSon@westminster-ca.gov to request a copy.

Special accommodations for disabilities and/or language barriers are available upon request, including translation services for Spanish or Vietnamese, as required by the City's Citizen Participation Plan. Any questions may be directed to the Grants and Housing Division at 8200 Westminster Boulevard, Westminster, CA 92683 or to Michael Son, Housing Specialist at (714) 548-3170 or via email at MSon@Westminster-CA.gov .
Westminster Journal 3/18/21-104219

CITY OF WESTMINSTER

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN THAT THE CITY COUNCIL OF THE CITY OF WESTMINSTER WILL HOLD A **PUBLIC HEARING** AS FOLLOWS:

HEARING BODY: CITY COUNCIL

DATE OF HEARING: WEDNESDAY, MARCH 8, 2023

TIME OF HEARING: 7:00 PM OR SOON THEREAFTER

LOCATION OF HEARING: City of Westminster Council Chambers at the Westminster Civic Center
8200 Westminster Boulevard
Westminster, CA 92683 or

Via Teleconference/Web Conference –

Pursuant to the Executive Order by the State of California and the

Westminster City Council Resolution No. 5176

PUBLIC HEARING ITEM:

The City Council will hold a public hearing to approve HOME-ARP Allocation Plan via a Substantial Amendment to the FY 2021/22 Annual Action Plan, and will accept public comments on the proposed Substantial Amendment. The Substantial Amendment will be published for public comment for a minimum 15-day period running from Thursday, February 16, 2023 through Wednesday, March 8, 2023.

As directed by the U.S. Department of Housing and Urban Development (HUD), the City will process a Substantial Amendment to integrate a HOME-ARP Allocation Plan that budgets a special allocation of HOME American Rescue Plan (ARP) funding provided to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability in Westminster. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

The City of Westminster is slated to receive \$1,613,107 in HOME-ARP funding and is proposing to utilize such funds as follows:

Development of Affordable Rental Housing \$1,371,141
HOME-ARP Program Administration and Planning \$241,966

TOTAL HOME-ARP ALLOCATION \$1,613,107

INVITATION TO BE HEARD:

The public is welcome and invited to comment pertaining to this Public Hearing Item. All persons wishing to speak and participate on this matter may do so via one of the following:

- Via Zoom by using the Zoom Link provided on the City's Website/Agenda at www.westminster-ca.gov/city-council-agendas, and "raising hand" during the Public Hearing until the City Clerk staff calls on you; or

- Via E-Comment/Email by visiting the City's Website and click on the link: CityClerkCSR@westminster-ca.gov; or

- Written Comment via Drop-Off to be filed with the City of Westminster, City Clerk's Office, 8200 Westminster Blvd, Westminster, CA 92683, during our Regular Posted Business Hours. Written Comment MUST be received by the City Clerk's Office by no later than 2:00 PM on said Public Hearing date; or

- Written Comment via U.S. Mail MUST be received by the City of Westminster, City Clerk's Office, at least 1-business day prior to the scheduled Public Hearing 8200 Westminster Blvd., Westminster, CA 92683.

Please reference the Public Hearing Title, date of hearing, and Agenda Item, in any written correspondence or Email Subject Line.

Further information may be obtained by contacting the following:

Michael Son, Housing Specialist
mson@westminster-ca.gov

Special accommodations for disabilities and/or language barriers are available upon request, including translation services in Spanish or Vietnamese, as required by the City's Citizen Participation Plan.

A copy of the HOME-ARP Allocation Plan can be accessed online at www.westminster-ca.gov/home-arp or a copy may be obtained from the City Clerk at a nominal charge during posted business hours or emailed upon request. The Agenda Staff Report and attachments, if any, will also be available on the City's website at www.westminster-ca.gov/citycouncil-agendas.

/S/

Lucie Colombo, CMC, CPMC

Interim City Clerk of the City of Westminster

Westminster Journal 2/16/2023-127786



CITY OF WESTMINSTER **NOTICE OF CONTINUANCE OF PUBLIC HEARING(S)**

NOTICE IS HEREBY GIVEN THAT THE MAYOR AND CITY COUNCIL OF THE CITY OF WESTMINSTER **CONTINUED** THE PUBLIC HEARING(S) AS DESCRIBED AND SCHEDULED BELOW:

HEARING BODY: CITY COUNCIL
MEETING TYPE: REGULAR MEETING
DATE OF HEARING: WEDNESDAY, MARCH 22, 2023
TIME OF HEARING: 6:00 PM OR SOON THEREAFTER
LOCATION OF HEARING: City of Westminster
8200 Westminster Boulevard
Westminster, CA 92683 or

At the Regular City Council meeting on March 8, 2023, the City Council voted 5-0 to CONTINUE this public Hearing to the date and time listed above.

CONTINUED PUBLIC HEARING ITEM(S):

PUBLIC HEARING - SUBSTANTIAL AMENDMENT TO FY 2021-2022 ANNUAL ACTION PLAN TO INTEGRATE THE HOME INVESTMENT PARTNERSHIPS PROGRAM-AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN FUNDS

PUBLIC HEARING ITEM:

The City Council will hold a public hearing to approve HOME-ARP Allocation Plan via a Substantial Amendment to the FY 2021/22 Annual Action Plan, and will accept public comments on the proposed Substantial Amendment. The Substantial Amendment will be published for public comment for a minimum 15-day period running from Thursday, February 16, 2023 through Wednesday, March 8, 2023.

As directed by the U.S. Department of Housing and Urban Development (HUD), the City will process a Substantial Amendment to integrate a HOME-ARP Allocation Plan that budgets a special allocation of HOME American Rescue Plan (ARP) funding provided to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability in Westminster. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

The City of Westminster is slated to receive \$1,613,107 in HOME-ARP funding and is proposing to utilize such funds as follows:

Development of Affordable Rental Housing	\$1,613,107
TOTAL HOME-ARP ALLOCATION	\$1,613,107

INVITATION TO BE HEARD:

The public is welcome and invited to comment pertaining to this Public Hearing Item. All persons wishing to speak and participate on this matter may do so via one of the following:

- In-Person by attending the legislative meeting; or
- Via E-Comment/Email by visiting the City's Website and click on the link: CityClerkCSR@westminster-ca.gov; or
- Written Comment via Drop-Off to be filed with the City of Westminster, City Clerk's Office, 8200 Westminster Blvd, Westminster, CA 92683, during our Regular Posted Business Hours. Written Comment MUST be received by the City Clerk's Office by no later than 2:00 PM on said Public Hearing date; or
- Written Comment via U.S. Mail MUST be received by the City of Westminster, City Clerk's Office, at least 1-business day prior to the scheduled Public Hearing 8200 Westminster Blvd., Westminster, CA 92683.

Please reference the Public Hearing Title, date of hearing, and Agenda Item, in any written correspondence or Email Subject Line.

Further information may be obtained by contacting the following:

Michael Son, Housing Specialist

mson@westminster-ca.gov

Special accommodations for disabilities and/or language barriers are available upon request, including translation services in Spanish or Vietnamese, as required by the City's Citizen Participation Plan.

A copy of the HOME-ARP Allocation Plan can be accessed online at www.westminster-ca.gov/home-arp or a copy may be obtained from the City Clerk at a nominal charge during posted business hours or emailed upon request. The Agenda Staff Report and attachments, if any, will also be available on the City's website at www.westminster-ca.gov/citycouncil-agendas.

/S/

Lucie Colombo, CMC, CPMC
Interim City Clerk of the City of Westminster

DATED: March 9, 2023
POSTED: March 9, 2023





APPENDIX F

PUBLIC COMMENTS

City of Westminster
City Council Meeting
March 22, 2023

HOME-ARP Allocation Plan
Public Hearing Comments

Council Member Amy Phan West

Asked American Family Housing what smart design is. Made a statement that funding is coming out of tax dollars. The City should be able decide how to best utilize this money instead of having the government tell how cities should utilize the funding, for example requiring the City to utilize funding for affordable housing.

American Family Housing Response to Council Member Amy Phan West

Explained that smart design relates to the goals and vision of the City's mixed used zoning.

City Staff Response to Council Member Amy Phan West

HOME and HOME-ARP lists out eligible uses for both funding sources, with affordable housing being an eligible use.

Council Member Carlos Manzo

Asked if the County of Orange, CalOptima, and Tax Credit funding presented in preliminary financing plan has been secured. What happens to the \$1.6 million in HOME-ARP funding if other funding sources are not secured? Is there any modification to the site that needs to be done such as electrical lines, etc.? Understands that the design may change and comparing affordable housing projects is not always appropriate as there are a lot of variables when it comes to affordable housing projects. Understands the need for low-income housing but wants to make sure we are getting the most of the City's investment. As far as design, would that come back to the City Council? Asked if the project will have an office type or workspace for supportive services.

American Family Housing Response to Council Member Carlos Manzo

There is nothing of major significance to changes to the site other than doing a setback from electrical power lines and changing the curb cut of the driveway. The design may change in regards to accommodating as much parking as possible. All of American Family Housing projects have wrap around services with dedicated staff to provide the supportive services.

City Staff Response to Council Member Carlos Manzo

The \$1.6 million will revert to City. It is the responsibility of the developer to secure additional financing to support the development of the project. The design will be part of the development review process once a formal application for the project is submitted. American Family Housing has met with the City's Planning Department to discuss the vision of the mixed-use zone.

Council Member Kimberly Ho

Questioned if American Family Housing's project was part of the request for proposal (RFP) process. What happens when only one response is received to an RFP? Mentioned that the site itself is currently made up of eight office spaces in a commercial zone. The lot for the proposed project is not that big and asked about the unit make up for the project. Stated that 28 units for the site is very ambitious. Asked about the amount of City's financial contribution.

City of Westminster
City Council Meeting
March 22, 2023

HOME-ARP Allocation Plan
Public Hearing Comments

City Staff Response to Council Member Kimberly Ho

Explained that City is looking for the most qualified developers and best project concepts. A total of \$3.591 million is being requested for the proposed project.

American Family Housing Response to Council Member Kimberly Ho

Described there are 27 one bedrooms and a 2-bedroom unit for the onsite manager. A density analysis has been done with an architect.

Vice Mayor Nam Quan Nguyen

Once the project is done, how do we determine the ownership of the project. Is it possible for a non-profit organization to own a project? Does the City have to provide services after the project is complete?

City Staff Response to Vice Mayor Nam Quan Nguyen

Private developers own the property. All affordable housing projects are generally owned by the private developers. The City does not own any affordable housing projects in Westminster. A non-profit can own a project. The developers will be providing the onsite services.

American Family Housing Response to Vice Mayor Nam Quan Nguyen

Explained the ownership structure as it relates to tax credit projects involving a managing general partner (non-profit) and limited partner (tax credit investor).

Mayor Chi Charlie Nguyen

Mentioned about County NOFA.

American Family Housing Response to Mayor Chi Charlie Nguyen

Will be applying to the County NOFA.

Terry Rains, Westminster Resident

Highlighted some substantial changes to the staff report and there was no verbiage explanation of such changes by city staff. Mentioned the housing inventory and gap analysis table in HOME-ARP allocation plan is misleading. City must provide safe and truly affordable housing to ever growing population of seniors. Why is City allocating so much money to housing homelessness while completing ignoring thousands of households who are extremely low income and at-risk households. City has zero units where rental rates are set on a fixed percentage of a tenant's income which is the only real affordable option for extremely low-income and at-risk households. Would like to see more units dedicated to extremely low-income households for the proposed project with American Family Housing.



APPENDIX G

HOMELESS QUESTIONNAIRE RESULTS

City of Westminster
HOME-ARP Citizen Participation Questionnaire Results

Name	Organization		Populations Served	How Many?	Rental Housing	TBRA	Non-Congregate Shelter	Childcare	Education Services	Employment Assist/Job Training	Food	Hsg Search & Counseling Services	Legal Services	Life Skills	Mental Health	Outpatient Health	Street Outreach	Substance Abuse	Transportation	Case Management	Mediation	Credit Repair	Landlord / Tenant Liaison	Srv. Homeless Youth	HIV/AIDS Services	Services for DV	Hsg Financial Assistance	Homeless Prevention	Housing Counseling
XXX	Love Westminster	Faith Based Coalition	Homeless TAY LMI	200	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG
XXX	FRC	City	Homeless At-Risk DV LMI	400-500	SIG	SIG	SIG	SOME	SOME	SOME	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SOME	SIG	SOME	SOME	SIG	SIG	SIG	SOME
XXX	Asian Americans Advancing Justice - OC	Homeless Provider DV Provider Civil Rights Org. Fair Housing Org. Eviction Defense Immigration Legal Provider	Homeless At-Risk DV Elderly Disabled TAY LMI Immigrants	200-300	SIG	SIG	SOME	SOME	SOME	SOME	SOME	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SIG
XXX	Abrazar, Inc.	Homeless Services Non-Profit Comm. Ctr	At-Risk DV Veterans Elderly Disabled TAY LMI	2,500	SIG	SIG	SOME	NO	SOME	SIG	SOME	SIG	SOME	SIG	SIG	SOME	SIG	SOME	SIG	SIG	SOME	SIG	SOME	SOME	SOME	SOME	SIG	Some	SOME
XXX	Abrazar, Inc.	Homeless Services Non-Profit Comm. Ctr	At-Risk DV Veterans Elderly Disabled TAY LMI		SIG	SIG	SOME	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SOME	SOME	SOME	SIG	SIG	SIG
XXX	WPD	City	Homeless At Risk Veterans	150	SOME	SOME	SIG	SOME	NO	SOME	NO	SOME	NO	NO	SIG	SIG	SIG	SIG	SOME	SIG	NO	NO	SOME	SOME	NO	SOME	SOME	SIG	NO
XXX	Westminster HS	Public School	Youth		SIG	SIG	SIG	SOME	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SOME	SOME	SOME	SOME	SOME	SIG	SIG	SOME	SOME	SIG	SIG
XXX	Abrazar, Inc.		At Risk DV Veterans Elderly LMI	500	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SOME	SOME	SOME	SOME	SOME	SIG	SOME	SOME	SOME	SOME	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SIG
XXX	Stand Up for Kids	Homeless Services Provider	Homeless At-Risk TAY	11-20	SOME	SIG	SOME	SOME	SIG	SIG	SOME	SIG	SOME	SIG	SIG	SOME	SIG	SIG	SOME	SIG	SOME	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SIG

Name	Organization		Populations Served	How Many?	Rental Housing	TBRA	Non-Congregate Shelter	Childcare	Education Services	Employment Assist/Job Training	Food	Hsg Search & Counseling Services	Legal Services	Life Skills	Mental Health	Outpatient Health	Street Outreach	Substance Abuse	Transportation	Case Management	Mediation	Credit Repair	Landlord / Tenant Liaison	Srv. Homeless Youth	HIV/AIDS Services	Services for DV	Hsg Financial Assistance	Homeless Prevention	Housing Counseling	
XXX	Resident	Resident	Resident		SOME	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SOME	SOME	SIG	SOME	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SIG	NO	NO	SIG	SOME	NO	SOME	SOME	NO	NO	SIG	SIG	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	SIG	NO	NO	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SOME	SOME	SIG	SOME	NO	SOME	SOME	SOME	NO	SOME	SIG	SOME	SOME	SIG	NO	SOME	NO	NO	NO	SOME	SOME	SOME	SOME	SIG	SOME	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		NO	NO	SIG	NO	NO	NO	NO	NO	NO	NO	SIG	SIG	SOME	SIG	NO	NO	NO	NO	NO	SIG	NO	NO	NO	SIG	NO	
XXX	Resident	Resident	Resident		SIG	SIG	SOME	SOME	SOME	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	NO	SIG	SIG	SIG	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SOME	SOME	SIG	NO	SOME	SOME	SOME	SIG	SOME	SIG	SIG	SOME	SIG	SIG	NO	SIG	NO	NO	NO	SOME	NO	SOME	SOME	SOME	SOME	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SOME	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SOME	NO	NO	SOME	SOME	SIG	SOME	SOME	SOME	SOME	SIG	SOME	SOME	SIG	SOME	SOME	NO	SOME	SOME	SOME	SOME	SIG	SOME	NO	NO	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	NO	SOME	SIG	SOME	SIG	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SOME	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SIG	SOME	SIG	SIG	SIG	SOME	SIG	SOME	SOME	SOME	SIG	SIG	SIG	SOME	SIG	SIG	SOME	SOME	SOME	SOME	SOME	SIG	SIG	SOME	SOME	
XXX	Resident	Resident	Resident		SOME	SOME	SOME	SIG	SIG	SOME	SIG	SOME	SOME	SOME	SIG	SIG	SIG	SIG	SIG	SOME	SOME	NO	NO	SIG	SOME	SOME	SOME	SIG	SOME	
XXX	Resident	Resident	Resident		SIG	NO	SIG	SOME	SOME	SOME	SIG	SIG	SOME	SOME	SIG	SIG	SIG	SIG	SIG	SOME	NO	SOME	NO	SOME	SOME	SOME	SIG	SIG	SIG	
XXX	Resident	Resident	Resident		SOME	SIG	SOME	SOME	SIG	SOME	SIG	SIG	SOME	SOME	SIG	SOME	SIG	SOME	SOME	SIG	SOME	SOME	SIG	SIG	SOME	SIG	SOME	SIG	SOME	
XXX	Resident	Resident	Resident		SIG	SIG	SIG	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SIG	SIG	SIG	SIG	SOME	SIG	SOME	SIG	SIG	SIG	SOME	SOME	SIG	SIG	SIG	
SIGNIFICANT NEED					19	17	19	13	16	15	21	22	8	18	29	21	22	25	12	19	12	5	10	20	7	18	21	23	17	
SOME NEED					9	8	7	14	11	12	7	6	17	9	0	7	6	3	12	7	9	15	12	7	18	9	7	4	9	
NO NEED					2	5	4	3	3	3	2	2	5	3	1	2	2	2	6	4	9	10	8	3	5	3	2	3	4	
RESIDENT SUBTOTAL					30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30
SIGNIFICANT NEED					30	28	26	19	23	24	26	32	15	25	40	29	32	35	19	28	16	14	20	26	8	25	33	35	26	
SOME NEED					11	10	13	20	16	16	14	9	22	14	2	12	9	6	18	11	17	18	15	14	29	15	8	5	12	
NO NEED					2	5	4	4	4	3	3	2	6	4	1	2	2	2	6	4	10	11	8	3	6	3	2	3	5	
AGENCY & RESIDENT TOTAL					43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	43	
PERCENTAGE OF TOTAL - AGENCY RESPONSES					85%	85%	54%	46%	54%	69%	38%	77%	54%	54%	85%	62%	77%	77%	54%	69%	31%	69%	77%	46%	8%	54%	92%	92%	69%	
PERCENTAGE OF TOTAL - RESIDENT RESPONSES					63%	57%	63%	43%	53%	50%	70%	73%	27%	60%	97%	70%	73%	83%	40%	63%	40%	17%	33%	67%	23%	60%	70%	77%	57%	
PERCENTAGE OF TOTAL - COMBINED AGENCY & RESIDENT RESPONSES					70%	65%	60%	44%	53%	56%	60%	74%	35%	58%	93%	67%	74%	81%	44%	65%	37%	33%	47%	60%	19%	58%	77%	81%	60%	
					2nd	2nd	5th	5th	5th	4th	5th	3rd	5th	5th	2nd	4th	3rd	3rd	5th	4th	5th	4th	3rd	5th	5th	5th	1st	1st	4th	
ACTIVITY RANKING PER AGENCY RESPONSES					2nd	2nd	5th	5th	5th	4th	5th	3rd	5th	5th	2nd	4th	3rd	3rd	5th	4th	5th	4th	3rd	5th	5th	5th	1st	1st	4th	
ACTIVITY RANKING PER RESIDENT RESPONSES					4th	5th	4th	5th	5th	5th	3rd	3rd	5th	4th	1st	3rd	3rd	2nd	5th	4th	5th	5th	5th	5th	4th	5th	4th	3rd	3rd	5th
ACTIVITY RANKING PER COMBINED AGENCY AND RESIDENT RESPONSES					4th	4th	4th	5th	5th	5th	4th	3rd	5th	5th	1st	4th	3rd	2nd	5th	4th	5th	5th	5th	5th	4th	5th	5th	3rd	2nd	4th

[illegible]