
County of Marin
Draft HOME-ARP Allocation Plan
First Substantial Amendment to the 2021 Annual Action Plan Amendment



Prepared by
Marin County Community Development Agency
Housing & Federal Grants Division

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Participating Jurisdiction: County of Marin

Date: February 27, 2023

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum.

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

The Marin County Community Development Agency's Housing and Federal Grants Division (CDA) conducts ongoing stakeholder engagement and consultation to help guide its funding programs to ensure they are responding to the needs of the community. Stakeholder engagement includes outreach to nonprofit agencies, local government jurisdictions, Continuum of Care (CoC) providers, housing developers, the local public housing agency, and other County departments.

Consultation for HOME-ARP included 18 individual meetings with representatives from 16 different organizations and government agencies serving the qualifying populations and Fair Housing experts, as identified by HOME-ARP. Consultation meetings took place between September 12, 2022 and September 23, 2022.

List of organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Adopt A Family	Homeless and Domestic Violence Service Provider - Serving Families	Virtual Meeting	<ul style="list-style-type: none">• More affordable housing for families.• Additional emergency and transitional housing options for families, in particular for families with multiple children.• Housing, vouchers, and support services for undocumented or non-chronically homeless families.• Support services to address food security, find housing, childcare, credit repair, mental health and isolation, addiction, etc.• Financial support to address cost of rent, childcare.• More rental assistance to address back rent from COVID-19 and keep people housed.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Bucklew Programs	Homeless and Domestic Violence Service Provider	Virtual Meeting	<ul style="list-style-type: none"> • Additional affordable housing and transitional housing needed for households managing mental health and substance health challenges, particularly families and young people. • Vouchers to transition to housing permanently. • Non-Congregate Shelter options for people with mental health challenges.
Center for Domestic Peace	Homeless and Domestic Violence Service Provider - Serving Families and QP3	Virtual Meeting	<ul style="list-style-type: none"> • Permanent affordable and transitional housing to leave dangerous situations. • Jobs with wages sufficient to pay full rent/back rent. • Support services to address food security, find housing, childcare, credit repair, mental health and isolation, addiction, etc. • Financial support to address cost of rent, childcare, funeral expenses, predatory loans, and debt. • Legal services. • Better language support to access public benefits and community-based services. • Housing, rental assistance, and services for undocumented households.
City of San Rafael	Public Agency Addressing the Needs of All QPs	Virtual Meeting	<ul style="list-style-type: none"> • Prioritize more affordable housing units with 2 and 3 bedrooms specifically for families. • More vouchers paired with supportive services.
Community Action Marin	Homeless and Domestic Violence Service Provider - Serving all QPs	Virtual Meeting	<ul style="list-style-type: none"> • More rental assistance to address back rent from COVID-19 and keep people housed. • More affordable housing, especially for families and older adults. • Supportive services including workforce/career training. • More vouchers.
Downtown Streets Team	Homeless and Domestic Violence Service Provider	Virtual Meeting	<ul style="list-style-type: none"> • More affordable housing. • Support services to help formerly homeless maintain housing.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			<ul style="list-style-type: none"> • More support services for currently homeless and those not eligible for vouchers.
Fair Housing Advocates of Northern California	Public Organization Addressing Fair Housing and Civil Rights for All QPs	Virtual Meeting	<ul style="list-style-type: none"> • Supportive services for people with vouchers, including housing navigators and landlord liaison. • More affordable housing. • More Fair Housing education and enforcement tools to compel compliance by landlords and developers around source of income, race discrimination, and local preference. • Affordable housing for extremely low-income and no-income households. • More vouchers. • Deposit assistance and rent assistance for households unable to access vouchers.
Homeward Bound of Marin	Homeless and Domestic Violence Service Provider/ Veterans' Service Provider - Serving all QPs	Virtual Meeting	<ul style="list-style-type: none"> • More capital funds for affordable housing development. • Affordable housing for extremely low-income and no-income households. • More housing-based case management paired with vouchers for families.
Marin Center for Independent Living	Public Organization Addressing the Needs of Persons with Disabilities	Virtual Meeting and Email	<ul style="list-style-type: none"> • More affordable housing for people with disabilities and their caregivers. • Rental assistance to maintain housing for people with disabilities. • More vouchers with set-aside specifically for people with disabilities. • More affordable long-term care housing for people unable to live independently. • Better language support to improve access to housing and services. • Support services for case management, housing navigation, and to alleviate added financial burden for people with disabilities. • Overall, better integration and access to housing-related resources and services for people with disabilities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Marin County Health and Human Services	Veterans' Service Provider	Virtual Meeting	<ul style="list-style-type: none"> • More housing overall. • Affordable housing for elderly fixed-income veterans who are being priced out of the market. • Temporary vouchers/financial assistance while VASH vouchers are on hold. • Support services for credit and eviction history repair.
Marin County Health and Human Services	Public Agency Addressing the Needs of All QPs	Virtual Meeting	<ul style="list-style-type: none"> • Time-limited vouchers for households on the path to a permanent voucher. • More funding for supportive services whose funding streams end in 2025.
Marin County Homelessness and Whole Person Care	Continuum of Care (CoC) Addressing the Needs of QP1 and QP2	Virtual Meeting	<ul style="list-style-type: none"> • Affordable housing available to extremely low-income and no-income households. • Vouchers to house rising number of homeless families, especially single-parent households. • Vouchers to support seniors on fixed incomes with dwindling savings. • Case management for permanent supportive housing.
Marin Housing Authority	Public Housing Agency (PHA) Addressing the Needs of All QPs	Virtual Meeting	<ul style="list-style-type: none"> • More affordable housing. • Support services such as housing liaison to keep people with vouchers housed and navigate landlord issues. • Vouchers to address Mainstream Voucher shortfall.
Ritter Center	Homeless and Domestic Violence Service Provider - Serving all QPs	Virtual Meeting	<ul style="list-style-type: none"> • More affordable housing dedicated to the Housing First approach. • Case management to keep formerly homeless housed. • More rental assistance and rapid re-housing resources. • Universal Basic Income for seniors and families.
Side By Side	Homeless and Domestic Violence Service Provider Addressing the Needs of	Virtual Meeting	<ul style="list-style-type: none"> • Permanent affordable and transitional housing. • Emergency shelter for minors. • Non-Congregate Shelter options for transitional age youth (TAY) women. • Vouchers to support TAY on Supplemental Security Income.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
	Transitional Age Youth		
St. Vincent de Paul Society of Marin	Homeless and Domestic Violence Service Provider - Serving all QPs	Virtual Meeting	<ul style="list-style-type: none"> • More capital for affordable housing. • Vouchers for seniors with shorter period of ongoing need. • More Non-Congregate Shelter with supportive services for clients on path to be permanently housed.

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

Through stakeholder engagement and consultation efforts, CDA learned about current and ongoing needs and gaps, groups facing significant challenges, and areas for potential investment. Consultations highlighted the significantly growing trend of family homelessness and the lack of investments in permanent affordable housing for this population. Also identified was the need for more housing assistance for domestic violence survivors. Across all populations, the need far outweighs the resources. Through the interviews, CDA identified that the Coordinated Entry system works well for specific populations, but its design is far too narrow to facilitate housing access for many populations, including those identified as Qualifying Populations (QPs) to be served by HOME-ARP. Below are the results of these outreach and consultation efforts:

Populations at risk of homelessness and/or facing ongoing impacts from COVID-19 in Marin County:

- Domestic violence survivors
- Families*
- Immigrant, monolingual Spanish-speaking, and undocumented households*
- People with dementia and traumatic brain injuries
- People with disabilities
- People exiting the justice system
- People with mental health and/or substance use issues
- Seniors*
- Transitional Age Youth

(*Most frequently referenced populations)

Trends impacting homelessness in Marin County:

- There has been a dramatic increase in family homelessness across Marin County. Families are finding themselves living in vehicles and precariously housed at rates not previously seen.
- The county’s immigrant, monolingual Spanish-speaking, and undocumented community has largely been left behind and precluded from accessing meaningful levels of COVID relief. Many in this community hold subleases. Some tenants felt threatened by landlords

and/or were pressured to take out predatory loans to pay rent during deep COVID. Both subleases and loans were precluded from the Emergency Rental Assistance Program.

- While COVID relief resources have generated many new housing vouchers, many low-income people at risk of homelessness or precariously housed households are ineligible for existing vouchers because they are undocumented and/or are not chronically homeless.
- The County and region are experiencing untenable rent increases impacting all populations.
- Naturally Occurring Affordable Housing (NOAH) has rapidly disappeared throughout the pandemic, as long-held income properties have sold and changed hands.
- There is an increasing number of seniors with income streams and savings coming to an end who will be unable to keep up with rapidly rising rents.
- The number of emergency beds and vouchers for domestic violence survivors is insufficient. Many survivors have stayed in unsafe households throughout the pandemic. Domestic violence increased during the pandemic and remains a large issue.
- The Coordinated Entry system used to prioritize housing vouchers has significant gaps in reaching and serving families, people with disabilities, Transitional Age Youth, folks with dementia and traumatic brain injuries, and people coming out of the justice system.
- Some landlords are using illegal income requirements and engaging in racial profiling of potential new leaseholders.
- The Marin Housing Authority is in a funding shortfall with HUD and is unable to issue new Housing Choice Vouchers (HCV) until additional resources are made available by HUD.
- The Veteran's Administration is not currently issuing Veterans Affairs Supportive Housing vouchers (VASH). The VASH program combines HUD's Housing Choice Voucher (HCV) rental assistance for homeless veterans with case management and supportive services.

Needs to reduce and prevent homelessness in Marin County:

- Additional affordable housing units.
- Case management and housing liaisons to keep people in housing.
- Additional housing vouchers and rental assistance.
- Additional Rapid Re-housing¹ funds to get households back into housing quickly before they become chronically homeless.
- Deposit assistance.
- Supportive services, including but not limited to access to food, utilities payments, childcare, and employment services.
- Legal services for eviction prevention, domestic violence, unpaid wages, etc.

Gaps in housing and services:

- Housing navigators to assist mainstream voucher holders with finding units.
- Family transitional housing, shelter beds, and trauma-informed care.

¹ Rapid re-housing provides short-term rental assistance and services. The goals are to help people obtain housing quickly, increase self-sufficiency, and stay housed.

- Universal Basic Income support.
- Senior assisted living for those experiencing or at risk of homelessness.

Potential funding opportunities:

- Acquisition and/or development of affordable rental housing.
- Buy down affordability in existing pipeline of affordable housing projects.
- Time-limited vouchers paired with case management.
- Supportive services addressing the supportive housing fiscal cliff.
- Acquisition and/or development of non-congregant shelter.

Additional considerations and findings:

- Bulk of COVID relief dollars received have funded vouchers and support services.
- All substantial new affordable housing developments in the last four years have been for seniors and homeless individuals, not available to families.
- Housing-based case management needs to be funded for 5 years and should be paired with vouchers to be effective.
- The County’s supportive housing programs have time-limited funding for a period of three years. The County is looking for new funding streams to avoid a fiscal cliff in three years, when program funding ceases.
- The Downtown Streets Team shower program has been cut, leaving people experiencing homelessness without access to showers.
- Sober living housing, shelters, and transitional housing often have a 6-month limit, which creates a revolving door.
- Many people experiencing homelessness do not feel comfortable or safe in congregate shelter environments.
- Landlords are not sad to see the tenants go and are able to raise rents significantly after evictions.
- Staffing is increasingly difficult for service providers due to cost of living in the area.
- New housing designs should consider intergenerational housing and universal design.

Existing Resources:

Over the past three years, the County has received over \$80 million in COVID and non-COVID related resources to support homeless services and prevent homelessness through state, federal, local, and private funds. The bulk of these funds have been allocated for supportive services, vouchers, and emergency rental assistance. Of this total, \$20 million has been allocated to support the acquisition and construction of a new homeless shelter and permanent supportive housing project, and three Homekey projects, all of which are limited to serving individual homeless adults.

Public Participation

A PJ must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable

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

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:** August 2, 2021, September 30, 2022, and November 13, 2022
- **Public comment period:** Start date - 11/15/2022; End date - 12/16/2022
- **Date(s) of public hearing:** November 4, 2021, November 3, 2022, December 1, 2022, and January 10, 2023

Describe the public participation process:

CDA strives to provide a number of opportunities for public participation and consultation. The first aspect of our public engagement approach is public noticing. CDA publishes notices in the local newspaper that serves the entire county. All public notices are translated into Spanish and Vietnamese and posted to the County’s Federal Grants webpage. The second component is community outreach. To support community outreach, CDA maintains a subscriber list of almost 4,000 stakeholders interested in housing issues such as nonprofit agencies, local government officials, community members, and developers. Email communications on funding program updates, public hearings, draft funding plans, and public comment periods are regularly distributed to this list. Public hearing staff reports are translated into Spanish and Vietnamese and posted to the Federal Grants webpage. In addition, oral interpretation and Communication Access Realtime Translation (CART) services are available upon request for PSC hearings. The BOS hearings provide Spanish translation and CART services, with other languages available upon request.

For HOME-ARP, CDA conducted several public hearings as part of its public participation process, and prepared and distributed public notices for each hearing in the manner described above. The Countywide Priority Setting Committee (PSC) met on November 4, 2021, November 3, 2022, and December 1, 2022 to educate the public on the range of activities allowed through HOME-ARP, solicit public comment, and establish a recommendation for the Board of Supervisors (BOS). Subsequently, the BOS conducted a hearing at their regularly scheduled meeting on January 10, 2023 to again educate the public on the range of activities allowed through HOME-ARP and receive public comments. At this hearing, the BOS approved the Draft Allocation Plan and Amendment to the 2021 Annual Action Plan in substantially the form provided. All public comments received during the hearings are recorded and included with the submission of this plan.

Describe efforts to broaden public participation:

To broaden public participation, CDA extended the period of plan review and public comment from the required 15 days to 32 days. The plan was posted on the website with instant translation available through Google Translate. In addition, CDA issued three public notices and held four public hearings to educate the public about HOME-ARP and receive public input. These public hearings included an overview of the HOME-ARP program's range of allowable activities, opportunities to provide input, key data points regarding housing and homeless needs in Marin, and the County's use of resources to support housing and homelessness throughout the pandemic.

CDA distributed three electronic communications with information about HOME-ARP, opportunities to consult, and the notice of public comment period through its community listserv, reaching a total of almost 4,000 unduplicated recipients.

The public hearings were held virtually to ensure that as many people as possible could participate without barriers of travel and public health concerns. Meeting notices were provided in English, Spanish, and Vietnamese. Interpreters were offered and Spanish translation was provided at two hearings. Participants were provided CDA contact information and were encouraged to contact staff outside of the meeting with comments or questions.

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

Comments and questions from the 11/3/2022 hearing:

- Why is rental assistance not a priority use? Towns are facing pressure to pass rent stabilization to prevent displacement. Can this be used in-lieu of those new policies?
- Can ADUs be considered for funding through HOME-ARP?
- Families have been disparately impacted in Marin for a long time. It is an ongoing area of housing need that is really difficult to make an impact. I am supportive of focusing on families. We should only focus these funds on people experiencing homelessness or at risk of homelessness and include families experiencing domestic violence.
- We should include preserving existing housing for families. Can we award funds to affordable housing groups to subsidize their purchase of market rate housing to preserve as affordable?
- I am concerned that this money will only go to one project. I want to spread it around Marin to support families who are experiencing homelessness or at risk of homelessness and victims of domestic violence.
- Can we reduce the requirements and restrictions on the funds and focus on projects ineligible in other funding cycles? Can we fund longer term projects?
- We need to look at how we diversify funding across the county.

- I don't think we can make a dent in an affordable housing project with such little funding. I think we can have a bigger impact with affordability buy down. It is a little amount of money; we should pick one thing and focus our resources.
- Is there other funding for safe houses for domestic violence victims? When there is a domestic violence incident, are there translation services to assist people with getting help?
- Safe house services are extremely limited and not enough. I was only allowed to stay for 5 days and had nowhere to go. There is a long waitlist for more permanent transitional shelter. It's not enough.
- There is considerable need for capital funding for the HUD Parcel, which is 50 units of veteran and workforce housing.
- Transitional Age Youth (TAY) families have a big gap in services and housing.

Comments and questions from the 12/1/2022 hearing:

- Thank staff for incorporating requested changes from the 11/3/2022 hearing.
- How much total funding will HOME-ARP leverage? How much HOME-ARP per unit?
- Explain how much funding per unit is needed to buy down affordability for fifty-five years?
- Is the concept that that we make two or three units in a development more affordable and spread it over a few projects? That makes sense to me to spread the funding across multiple projects across the County.
- 10 to 15 units is too few units for our goal to house extremely low-income.
- We know the Area Median Income is high, but what does it really mean when it comes to affordable rents? Can people who work at Walgreens, CVS, restaurants, retail, or grocery stores afford rents a 40, 50, 60% AMI?
- How are we supporting the extremely low-income people afford rents outside of vouchers?
- There are not enough HUD approved properties to house all of the people in Marin who are homeless, on strict incomes, seniors, and the working poor.
- Using vouchers to offset the inflation of housing costs is not enough. We have so many people that are under the poverty line competing for services and housing that do not exist.
- Will these funds be going to for-profit developers/developments?
- What would it look like if we tried to buy down affordability to 0-30% AMI?
- If we do a 20-year time period for affordability could increase the number of units?
- Can this housing providers collaborate with other CBOs so that they can better care for residents?
- Change the affordability to 20 years, and increase the number of units.

Comments and questions from the 1/10/2023 hearing:

- What are the mechanics of making the units more deeply affordable? Is there an ongoing subsidy?

- Is this only available to affordable housing developments or could a market rate developer use these funds for their inclusionary units?
- Was outreach conducted with providers in West Marin? Staff confirmed that outreach was done in West Marin with local nonprofits and service providers.
- How are foster youth able to be served through the family preference?

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

All comments and recommendations were accepted.

Needs Assessment and Gaps Analysis

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

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	45	19	110	110	0								
Transitional Housing	97	44	40	40	12								
Permanent Supportive Housing	174	57	506	496	72								
Other Permanent Housing	120	45	104	97	0								
Sheltered Homeless						133	158	14	81				
Unsheltered Homeless						91	737	51	28				
Current Gap										91	28	737	582

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	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	38,317		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,065		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,505		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,170	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,775	
Current Gaps			5,375

Data Sources: 2019 American Community Survey 5-year estimates, Table B25003; 2015-2019 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 total number of individuals experiencing homelessness in Marin County has increased by 8.4% from the 2019 Point in Time Count (PIT). While the number of people experiencing homelessness has not changed substantially, the demographics of *who* is homeless are shifting. A particularly stark trend is that family homelessness has grown by over 35%, which is unprecedented in Marin. Overall, the PIT showed 1,121 people experiencing homelessness in Marin County with 26% of those sheltered and 74% unsheltered. With regard to age, 8% were under 18, 15% 18-24, 50% 25-59, and 28% 60 and older. 59% were male, 39% female, and 2% were transgender or gender non-conforming. 65% were white, 22% black, 4% American Indian or Alaska Native, and 5% multi-racial or other. 23% were Hispanic/Latinx. Since the PIT count was completed, current data from the County's Homeless Management Information System (HMIS) indicates that the number of those experiencing homelessness is continuing to grow and has increased to over 1,400 homeless individuals since January 2022.

At Risk of Homelessness as defined in 24 CFR 91.5

The demographics of households at risk of homelessness include low-income individuals and families with children (especially extremely low-income) who are currently housed but severely rent-burdened, currently residing in shelters, and/or formerly homeless families and individuals who are receiving rapid re-housing assistance.

Marin County’s 2020-24 Consolidated Plan discusses the demographics of households with severe housing needs as defined by HUD, using HUD-prepared housing needs data. The tables below show the number of Marin County households that have severe housing needs by income, race, and ethnicity. Needs are defined as one or more of the following housing problems: 1) Housing lacks complete kitchen facilities, 2) Housing lacks complete plumbing facilities, 3) Household has more than 1.5 persons per room, 4) Household cost burden exceeds 50%.

0%-30% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	10,967	4,295	877
White	7,243	3,075	628
Black / African American	319	170	24
Asian	459	225	58
American Indian, Alaska Native	100	15	4
Pacific Islander	34	0	0
Hispanic/Latinx	2,596	538	95

Data Source: 2011-2015 CHAS

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Total
All households	13,845	3,860	17,705
Renter households	8,170	2,250	10,420
Owner households	5,675	1,610	7,285

Data Source: 2015-2019 CHAS

30%-50% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,082	6,312	0
White	4,266	4,781	0
Black / African American	119	90	0
Asian	234	388	0
American Indian, Alaska Native	4	10	0
Pacific Islander	0	0	0
Hispanic/Latinx	1,380	928	0

Data Source: 2011-2015 CHAS

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Total
All households	9,415	3,485	12,900
Renter households	5,775	990	6,765
Owner households	3,640	2,495	6,135

Data Source: 2015-2019 CHAS

The most recent HUD Comprehensive Housing Affordability Strategy (CHAS) data identifies that 9,085 (or 26%) of Marin renter households are severely rent-burdened and are considered an at-risk population². Severely rent-burdened households are defined as spending more than half of monthly income on rent. An additional 8,745 (or 22.8%) renter households are rent-burdened, paying more than 30% of their income, but less than 50%.

In addition, the County’s 2023 Draft Housing Element estimates 1,274 agricultural workers living in West Marin, the majority of whom are not seasonal workers. According to the Community Land Trust Association of West Marin (CLAM), a farm worker in Marin is likely to earn an annual salary of no more than \$28,000.

There are significant race-based income disparities in Marin County that directly impact housing access and financial burden. In 2018, non-Hispanic White residents in Marin earned a median annual income of \$138,214³, while Black/African American and Hispanic/Latinx residents earned roughly half that amount, at \$68,013 and \$82,486 respectively. With a median contract rent of about \$2,186 per month in 2021⁴, non-Hispanic White residents spend about 19% of their monthly income on rent, in comparison to 39% and 32% for Black/African American and Hispanic/Latinx residents, respectively.

There are 200 active applicants on the Housing Choice Voucher/Section 8 waitlist. The Marin Housing Authority's Housing Choice Voucher/Section 8 waitlist opened in September 2008 and received 11,200 applications. Additionally, Marin Housing Authority has 822 applicants on their combined Public Housing waiting list. The Family Public Housing waitlist last opened in 2021 and had 700 applicants. The senior and disabled properties waitlist last opened in 2015 and currently has 213 active applicants.

Due to historic and ongoing discriminatory practices and government policies, members of protected classes, specifically people of color and those with disabilities, are more affected by the most common housing problems in Marin County, which include cost, availability,

² CHAS Data 2015-2019

³ 2016-2021 American Community Survey 5-year estimates, Table S1903

⁴ 2016-2021 American Community Survey 5-year estimates, Table B25058

and quality. In addition, these individuals are less likely to have housing access in areas of opportunity in the County.

Individuals and families receiving rapid re-housing assistance that are nearing the end of their assistance often have an ongoing need for increased income, education/vocational training that could lead to higher-paying employment, affordable childcare, and ongoing budgeting and money management support. Linkages to community resources are especially important as the end of assistance approaches in order to ensure that households are able to access the supports they need to be self-sustaining in the future.

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

In the 2022 PIT, 109 people fleeing domestic violence (DV) and experiencing homelessness were counted. 81 were sheltered and 28 were unsheltered. 5% of survey respondents reported they were currently experiencing DV or partner abuse. 54% were women, 39% were men, and 8% were transgender. Of these respondents, zero reported dating violence; 3 reported sexual assault (all of them females over age 24, 67% Hispanic and 33% Other); 3 reported stalking (all of them females over age 24, 67% Hispanic and 33% Other); and zero reported human trafficking.

In addition, although no victims of human trafficking were identified in the 2022 PIT, in Fiscal Year 2021-22, the Center for Domestic Peace (C4DP), Marin County’s lead DV service provider, served a total of 29 victims of human trafficking. C4DP records indicate that there are 373 survivors in Marin who currently need services. According to C4DP, demographics of the DV survivor population include: 1) Age - 62% were under 18, 9% were 18-24, and 29% were adults over age 24; 2) Ethnicity - 78% were Hispanic/Latinx, 9% were African American, 10% were Caucasian, and 4% were other.

Although many cases of domestic violence, dating violence, sexual assault, stalking, and human trafficking go unreported, some case data from calendar year 2022 is available through the County District Attorney’s Office. The data below only includes cases that were reported to the police with an identified suspect. The State of California does not require jurisdictions to track data on dating violence cases separately from domestic violence cases, so the two categories are subsumed into the Domestic/Dating Violence column. In addition, the District Attorney does not explicitly ask victims about their race or ethnicity, but they do track racial data if it is included in a report or offered by a victim.

Reported Cases of QP3 Populations: Marin County, 2022

Cases by Victim Age

	Domestic/Dating Violence	% of Total	Sexual Assault	% of Total	Stalking	% of Total	Human Trafficking	% of Total
0-5	1	0.2%						
13-17	4	1%	19	19%				

18-29	178	30%	32	31%	9	32%	2	100%
30-44	247	42%	25	25%	11	39%		
45-64	130	22%	20	20%	6	21%		
65+	16	3%	2	2%	1	4%		
Unknown	9	2%	4	4%	1	4%		
Total Cases	585		102		28		2	

Data Source: Marin County District Attorney's Office

Cases by Victim Race

	Domestic/Dating Violence	% of Total	Sexual Assault	% of Total	Stalking	% of Total	Human Trafficking	% of Total
White	212	36%	43	42%	13	46%		
Black	60	10%	8	8%	4	14%	1	50%
Hispanic/Latinx	210	36%	35	34%	8	29%	1	50%
American Indian/Alaska Native	2	0.3%						
Hawaiian	1	0.2%						
Chinese	1	0.2%						
Pacific Islander	4	1%						
Asian Indian	1	0.2%						
Other Asian	14	2%			1	4%		
Other Race	3	1%						
Unknown	77	13%	16	16%	2	7%		
Total Cases	585		102		28		2	

Data Source: Marin County District Attorney's Office

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

Households headed by one person are often at greater risk of housing insecurity, particularly female-headed households, who may be supporting children or a family with only one income. Female-headed households fall into one of three primary groups in Marin County: single professional women, single parents, and seniors. The last two groups in particular may have a need for affordable housing. The 2023-31 Housing Element identifies that female-headed households with children may face particularly acute housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding an affordable home more challenging.

Another population at greatest risk of housing instability are people living with disabilities. People living with disabilities require a wide range of housing supports. Special consideration should be given to income and affordability, as many people with disabilities are living on fixed incomes. The 2022 Supplemental Security Income (SSI) rate for Marin County is \$841 for an individual and \$1,261 for a couple. According to the 2020-24 Consolidated Plan, the Marin Center for Independent Living (MCIL) estimates that there are approximately 46,029 people living with disabilities in the county. One quarter of people

with disabilities in Marin live in poverty. In addition, 38% of individuals with disabilities are homeless or housing insecure. In 2020, MCIL served 683 people with all types of disabilities (including older adults); of these, over 60% were facing a lack of affordable, accessible housing. Approximately 75% of MCIL's clients live under the poverty level.

Unaccompanied children (under 18) and Transitional Age Youth (18-24), particularly those aging out of the foster care system and those with serious emotional disturbance or emerging mental illness, are at greatest risk of housing instability. Detailed data on this subpopulation (QP4-F) is difficult to come by, but the data we do have is illuminating. Over the two-year period of 2021-2022, twelve (12) youth aged out of the foster care system in Marin County. Due to data masking requirements, we are unable to publish demographic data on these individuals. However, according to staff members in Marin County's Health & Human Services department, many former foster youth end up leaving the county due to the high cost of housing. The individuals who stay are often receiving housing support such as Transitional Housing Program Plus (THP+) or housing vouchers such as Foster Youth to Independence (FYI). The County has developed a guaranteed income program for these youth. This year the program will serve 11 youth for one year, providing them with an extra \$1000 to use towards living expenses. This will make a huge difference, but there are more youth who would benefit from this financial support in an ongoing manner.

In terms of youth homelessness data, the 2022 PIT Count identified two unaccompanied children (under 18 years old) and 124 unaccompanied Transition Age Youth (age 18-24), accounting for 11% of the population experiencing homelessness in Marin County. Down slightly from years past, 5% of children and Transition Age Youth experiencing homelessness were sheltered, with 95% unsheltered. Unaccompanied children and Transition Age Youth have 73% identifying as White, while the Black/African American unaccompanied children and Transition Age Youth are overrepresented from the total homeless population with 23%, compared to only 2% of the general Marin County population. The number of youth identifying as Hispanic/Latinx is 22% in 2022.

Many U.S. veterans experience conditions that place them at increased risk for homelessness. Veterans experience higher rates of post-traumatic stress disorder (PTSD), traumatic brain injury (TBI), sexual assault, and substance use disorders. Veterans experiencing homelessness are more likely to live on the street than in shelters, and often remain on the street for extended periods of time. The 2022 PIT Count identified 65 homeless veterans in Marin County, 51 of which were unsheltered. Four-fifths (80%) of veterans were cisgender male, 15% cisgender female, and 5% transgender. Black and Multi-Race veterans were overrepresented when compared to the general population of Marin County, with 23% Black veterans compared to 2% of the general population, and 15% Multi-Race veterans compared to 11% of the general population.

Another population at high risk of homelessness is households that qualify for the Low-Income Home Energy Assistance Program (LIHEAP). LIHEAP assists low-income

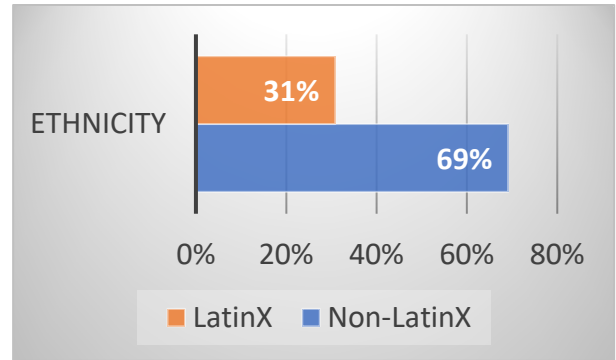
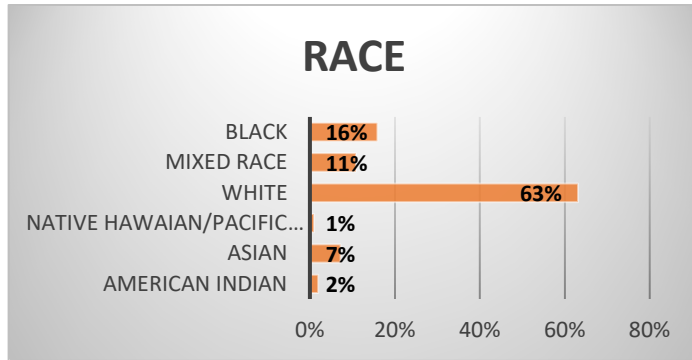
households that pay a high portion of their income to meet their energy needs. In 2022, 947 households received financial support through LIHEAP. Nearly half of the recipients were self-reported female-headed households.

Race	
AMERICAN INDIAN OR ALASKA NATIVE	4
ARAB / MIDDLE EASTERN	2
ASIAN	29
BLACK OR AFRICAN AMERICAN	93
HISPANIC/LATINX	176
MULTI-RACE	16
NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER	1
OTHER	42
WHITE	201
UNKNOWN	383
Total	947
Ethnicity	
HISPANIC/LATINX	181
NON-HISPANIC, LATINX, OR SPANISH ORIGINS	325
UNKNOWN	441
Total	947

Age	
18-24	7
25-44	245
45-54	177
55-59	87
60-64	112
65-74	161
75+	146
Unknown	12
Total	947

From April 2020 through September 2022, the County of Marin distributed approximately \$27 million in rental assistance to over 1,900 renter households and \$4.3 million in rapid re-housing support to over 700 households to prevent homelessness and provide stability to low-income households in Marin. Although these substantial resources have been distributed, these households remain at high-risk of future homelessness due to increasing rents, stagnant wages, and continuing debts resulting from the COVID-19 pandemic.

In addition, there are hundreds of low-income renter households in Marin that were ineligible for rental assistance because of program design, which did not provide aid to people who were subtenants or renters who borrowed money to pay rent, often from predatory lenders. These two aspects negatively impacted the immigrant and Hispanic/Latinx communities in Marin. The demographics of rental assistance recipients include:



In addition, 69% of rental assistance recipients have income below 30% AMI and 59% of recipients are female-headed households.

According to 2015-2019 ACS Income Distribution Overview data, Marin County has 17,705 households with incomes below 30% HUD Area Median Family Income. 7,285 are homeowner households and 10,420 are renter households. In addition, 18,780 households are severely cost burdened, paying more than 50% of their income on housing. 9,695 are homeowner households and 9,085 are renter households.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

There is a significant need for additional deed restricted affordable housing units, permanent supportive housing units, and housing subsidy vouchers. Of the 1,121 people experiencing homelessness in Marin, 284 are chronically homeless and would likely require Permanent Supportive Housing. Marin also maintains a by-name list of people experiencing homelessness. Based on the by-name list, approximately 625 people qualify for permanent supportive housing, though some would likely be okay without supportive services. Due to the high housing costs in Marin and the greater Bay Area, most of the remaining people experiencing homelessness will need deed-restricted affordable housing or some type of housing subsidy. With a growing number of families becoming homeless, there is a need for more shelter beds specific to families. There is also a need for additional case management. The 2022 PIT revealed that 830 people did not have access to shelter or transitional housing. In addition, 33% of PIT survey respondents reported not receiving any government assistance, 59% did not receive free meals, 76% did not receive day services, 77% did not receive health services, and 79% did not receive bus passes.

There is growing gap in affordable housing and permanent supportive housing for families. Additional gaps include assisted living and memory care facilities for seniors experiencing homelessness, as well as homeless shelters and deed restricted affordable housing for youth experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

As noted previously, the County has 13,945 households with incomes of 50% AMI or less that have at least one severe housing problem. Housing problems include: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. When looking at cost burden alone, 17,830 households are rent-burdened and 9,085 of those are severely rent-burdened.

Through the 2023-31 Housing Element process, Marin County jurisdictions are required to plan for 4,171 housing units for very low-income households and 2,400 housing units for low-income households. This results in a minimum need of 11,259 affordable units. However, this number is likely much higher given that the units being planned for, if built, would be deed restricted at levels higher than 50% AMI.

To truly meet the housing affordability needs of extremely low- and very low-income households in Marin, additional mainstream and project-based vouchers are needed from HUD. Time-limited Tenant Based Rental Assistance and Emergency Rental Assistance Programs are not adequate to address the ongoing affordable housing need in Marin.

The County has limited sources to fund the extensive need for affordable housing. Since 2019, \$11 million of County general funds have been committed to address affordable housing needs. More resources will be required in order to significantly increase affordable housing production. In addition, projects and programs assisting those at risk of homelessness require ongoing operating funds.

There is a prominent need for additional services, including: housing navigation, case management, government assistance, nutrition assistance, counseling, childcare, legal services, health services, and transportation assistance.

There is a gap around deed restricted affordable housing for families and transitional aged youth and foster youth aging out of the system of care. There is also a gap of assisted living and memory care facilities that will accept Medi-Cal. Through consultation, the County learned that low-income residents requiring this care are forced to leave the county, often to the Central Valley region, far away from their support networks.

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

Based on domestic violence (DV) provider service records, there are 373 survivors in Marin who need services. Out of that total, 148 people are receiving services and 225 are not. The services that DV victims most need are: 1) permanent housing, and 2) representation by an attorney for DV legal counsel.

Helping survivors find permanent, affordable housing has been the biggest challenge and need for years. Rent costs in Marin remain beyond reach for many DV survivors, and their loss of income due to COVID has made it harder for many of them to afford rent. Although the Center for Domestic Peace (C4DP) provides legal advocacy for survivors within the civil and criminal justice systems, they do not have attorneys on staff who can provide representation. Victims are unable to receive representation around custody, child support, divorce, etc., creating a gap around these types of cases for DV victims.

Through consultation with C4DP, the County's lead service provider for survivors of dating violence, sexual assault, stalking, and human trafficking, we can see that the needs and gaps of these subpopulations are very similar to those of C4DP's typical domestic violence clients, and are equally difficult to address. The most prominent need is legal services – including bilingual Spanish attorneys – and the biggest gap is affordable housing for these subpopulations. There is a large disparity between the number of reported cases and the numbers of people actually receiving services.

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

Through consultation and data analysis, we concluded that the greatest needs for the Other Populations (as defined by HUD in the Notice) are more deed restricted affordable units and additional vouchers to create permanent subsidies on market rate properties. Mainstream, Project-Based, and Veterans Affairs Supportive Housing vouchers are all needed in greater numbers from HUD.

These populations also have a prominent need for additional services, including housing navigation, case management, utility subsidies, government assistance, nutrition assistance, counseling, childcare, legal services, career counseling, vocational training, post-secondary education supports, health services, and transportation assistance.

Based on the number of unsheltered homeless Transitional Age Youth and Veterans, there is a need for at least 190 units with funds to support operations of such housing. In addition, there is a need for more Transitional Housing Program Plus (THP+) and housing vouchers such as Foster Youth to Independence (FYI). There is a gap of available case management for youth which prevents the County from receiving additional FYI vouchers. Additional needs of Transitional Age Youth include living wage jobs and financial aid for college.

There is a gap around deed restricted affordable housing for families and Transitional Age Youth and foster youth aging out of the system of care. There is also a gap of assisted living and memory care facilities that will accept Medi-Cal.

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

While Marin continues to focus on permanent housing, severe gaps remain, including permanent affordable housing for families at risk of and exiting homelessness. Over the past three years, the County has invested \$20 million to build 140 new units of permanent supportive housing (PSH), available for individuals only. In addition, it has created housing-based case management paired with vouchers to create an additional 200 beds of PSH for individuals and families. However, there is still a significant gap in permanent supportive housing (particularly for the highest-need clients). There is also a gap in senior assisted living facilities for QP1 and QP2 for those experiencing or at risk of homelessness who need a higher level of care (such as skilled nursing or dementia care). Marin's shelter inventory is also insufficient for the number of people experiencing homelessness, with only 26% of the homeless population being sheltered at the 2022 PIT count. There is a specific gap of affordable housing and shelter housing suitable for Transitional Age Youth.

Over the past four years, all significant new affordable housing developments have been deed-restricted for seniors and individuals. There have been no new significant family housing developments in that time.

Identify characteristics associated with instability and increased risk of homelessness:

In Marin County, the characteristics most associated with instability and increased risk of homelessness are high cost of rental housing, low stock of available rental housing, and abundance of low-wage service jobs. According to the 2023-31 Housing Element, the median rent for a one-bedroom apartment was \$2,450 while the median rent for two-bedrooms was \$3,151. The vacancy rate for rental units is a staggeringly low 2.5%. As reported in the Needs Assessment portion of this plan, 26% of Marin renter households are severely rent-burdened.

Identify priority needs for qualifying populations:

The priority needs for the qualifying populations include new affordable housing development, tenant-based rental assistance (TBRA), non-congregate shelter, and supportive services. Over the past three years, the County has made significant investments in supportive services, vouchers, permanent supportive housing for individual adults, and emergency rental assistance. These investments have been made possible through state, federal, local, and private funds. Additional permanent affordable family housing has been the most difficult need to address.

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:

Each of the sources that Marin County staff examined (detailed below) reinforce the data on the needs and gaps in existing shelter housing inventory and service delivery systems – in particular,

the service/housing gaps experienced by a growing number of homeless families, and the need for more investments in new affordable housing.

We compiled the data presented in this HOME-ARP plan through a number of sources, including HMIS, 2022 Point in Time Count, 2023-2032 Housing Element, 2020-24 Consolidated Plan, Comprehensive Housing Affordability Strategy data (CHAS), and County of Marin program tracking materials for the Continuum of Care, Emergency Rental Assistance Program, Health and Human Services, District Attorney's Office, and Community Development Agency. Additionally, through consultations with community stakeholders and partner organizations, we were able to further determine priority needs and gaps among eligible activities.

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 County releases a Notice of Funding Availability/Request for Proposals (NOFA/RFP) annually to solicit applications from developers for a number of funding sources, including Permanent Local Housing Allocation (PLHA) and County Affordable Housing Funds (HTF). Consistent with CDA practices, HOME-ARP will utilize the open, competitive solicitation process for applications through the existing NOFA/RFP cycle. HOME-ARP funds will be used to leverage PLHA and HTF funding sources for greater impact. The NOFA/RFP guidelines will describe HOME-ARP requirements and be available to potential applicants prior to the NOFA/RFP release. In addition, CDA will modify any grant or contract agreement templates and monitoring policies accordingly to ensure compliance with HOME-ARP.

Describe whether the PJ will administer eligible activities directly:

The County will administer HOME-ARP 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 County will independently administer the HOME-ARP grant. We will retain administrative funds to support internal administration and planning costs associated with the HOME-ARP grant. The County will allocate 15% toward administration.

The County may consider allocating less toward administration. Any remaining resources would be allocated to approved funding activities.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,467,167		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 435,382	15 %	15%
Total HOME ARP Allocation	\$ 2,902,549		

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

To address the priority needs identified, the County anticipates allocating HOME-ARP funds to two or three affordable rental housing projects, free of population-specific deed restrictions that would prevent families or any of the QPs from accessing units. The County will make funds available for acquisition, construction, and rehabilitation of permanent affordable rental housing.

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 analysis reveals a large need for 5,375 additional affordable rental units. This plan also points out that family homelessness has increased by 35% in the past two years, and there have been no substantial affordable housing developments available to families in the past four years. Further, the plan identifies that over the past three years, over \$80 million has been invested in supportive services, vouchers, emergency rental assistance, and the acquisition and construction of a new homeless shelter and three permanent supportive housing projects serving individual homeless adults. Marin County staff plan to leverage HOME-ARP alongside local funding sources (PLHA and HTF) for the creation of permanent affordable housing accessible to all QPs, but with a preference for families experiencing homelessness, at risk of homelessness, and families that are domestic violence survivors.

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:

HOME-ARP funds will be used to create or preserve 30 affordable rental housing units for qualifying populations.

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:

The County anticipates that HOME-ARP funds will create 30 more deeply affordable permanent housing units available for families across two or three developments with an affordability period of 20 years. Together with other family affordable housing developments funded through other County sources, the priority of reducing family homelessness in our region will be addressed.

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 County will give preference to families who are experiencing homelessness, at risk of homelessness, and families that are domestic violence victims and experiencing homelessness or at risk of homelessness.

All Qualifying Populations will be eligible for units funded with HOME-ARP. Because HOME-ARP units will be a subset of the total development, all QPs who apply for the waitlist will be eligible for the broader subset of units in addition to the HOME-ARP units and any subsequent housing subsidies available through the project. In addition, the County will continue to fund and support housing and services for the other QPs through other funding sources and programs, including going funding through the Continuum of Care and one-time sources such as Homekey.

The County has been in contact with the Office of Fair Housing and Equal Opportunity and received early indication that the identified preference may be established without violating fair housing laws or civil rights. The gap of affordable family housing in the county, combined with robust investments in housing restricted to seniors and individuals exiting homelessness, support the articulated preference for HOME-ARP funds.

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 method of prioritization will be specific to each project. The housing developments will use project-specific waitlists. HOME-ARP units will be leased up with applicants that meet the approved preference. If there are no applicants meeting the approved preference, applicants meeting the other Qualifying Population criteria will be selected from the waitlist.

The County came to the decision that families have an unmet gap in housing and homelessness services through an examination of the available data, funding trends, and feedback received during consultations. In our conversations with local organizations, families came up

consistently, and in fact were referenced the most as an emerging gap. We found that families are not well-served by our coordinated entry program, which focuses primarily on individuals. Despite very recent efforts to train more providers to use the County's HMIS system and to assess/enroll more families, families are still rarely able to access units and vouchers through coordinated entry. This was particularly alarming in light of the 35% increase in family homelessness in 2022 from the 2019 PIT count. We wanted to also address the issue of domestic violence through the preference, because while the local DV service provider only identifies 373 survivors who need services, in 2022 alone, 585 domestic violence cases were reported to the police. There is an unaddressed need in Marin County for QP3.

Further, after an examination of funding trends over the past four years, we saw that the vast majority of the \$80 million invested by the County in housing and homelessness prevention was geared toward supporting seniors and homeless individuals only, not families. These datapoints and feedback reveal a significant gap in housing and services specific to families in Marin County. Further underscoring this gap is the County's former Voluntary Compliance Agreements with HUD, which explicitly tasked the County with increasing its investments in family housing.

By giving preference to families who are experiencing homelessness and at risk of homelessness, and families that are domestic violence victims experiencing homelessness or at risk of homelessness, the County will address a historic lack of housing resources and capital investments into affordable housing projects serving families. Although the County is no longer subject to a Voluntary Compliance Agreement, implementing this preference will continue to further the goals of those past agreements. In addition, this preference will help support an underserved population that has unique requirements, such as larger units and different types of services.

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 primary referral method for projects will be project-specific waiting lists.

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 County will not limit eligibility.

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:

The County will not limit eligibility.

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):

The County will not limit eligibility.