## **County of Marin**

2019 Consolidated Annual Performance and Evaluation Report (CAPER)



## Prepared by

Marin County Community Development Agency Housing & Federal Grants Division

### **CR-05 - Goals and Outcomes**

### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Marin County is an entitlement jurisdiction, receiving an annual allocation of Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Urban Development (HUD). As a recipient of CDBG and HOME funds, the County is required to prepare a five-year strategic plan that identifies community needs, prioritizes these needs, and establishes goals and objectives to meet the needs.

Each year the County of Marin is also required to provide an assessment of its accomplishments toward meeting the goals and objectives in the Consolidated Plan (Con Plan). This report is called the Consolidated Annual Performance Evaluation and Report (CAPER). The CAPER also evaluates the progress of meeting the one-year goals identified in the Annual Action Plan. To meet the goals in the 2015-2019 Con Plan, the County utilized \$1,358,818 in CDBG and \$206,899 in HOME funding for the 2019 program year that ran from July 1, 2019 through June 30, 2020. Clearly there were impacts to services and projects due to the Coronavirus pandemic.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Accessibility Improvements	Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2000	5120	256.00%			
Accessibility Improvements	Non-Housing Community Development	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	1				
Administration	Administration costs	CDBG: \$ / HOME: \$	Other	Other	70	0	0.00%			
Child Care Centers	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	464				
Child Care Centers	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	500	800	160.00%			

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Community Facilities	Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	78		14166	11906	84.05%
Community Facilities	Non-Housing Community Development	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	20	0	0.00%			
Fair Housing Services	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Fair Housing Services	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	942		0	0	

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Fair Housing Services	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	10	2055	20,550.00%	480	438	91.25%
Homeless Shelters	Homeless	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	237		237	237	100.00%
Homeless Shelters	Homeless	CDBG: \$ / HOME: \$	Homeless Person Overnight Shelter	Persons Assisted	20	424	2,120.00%	237	237	100.00%
Homeless Shelters	Homeless	CDBG: \$ / HOME: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Homeowner Housing - New Construction	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	10	0	0.00%			
Homeowner Housing - New Construction	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	5	0	0.00%			
Homeowner Housing- Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	0				

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Homeowner Housing- Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	0	0				
Homeowner Housing- Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	90	252	280.00%	12	19	158.33%
Housing for Formerly Homeless People	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	10	0	0.00%			
Housing for Formerly Homeless People	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Homeless Person Overnight Shelter	Persons Assisted	20	0	0.00%			
Housing for Formerly Homeless People	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	40	0	0.00%			
Housing for Formerly Homeless People	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Homelessness Prevention	Persons Assisted	20	945	4,725.00%			
Housing for Formerly Homeless People	Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	10	0	0.00%			

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Other Housing Activities	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	20	0	0.00%			
Other Housing Activities	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	0	0				
Public Services	Non-Housing Community Development	CDBG: \$ / HOME: \$ / CDBG- CV: \$938065	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4500	31152	692.27%	3244	6603	203.55%
Public Services	Non-Housing Community Development	CDBG: \$ / HOME: \$ / CDBG-CV: \$938065	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Rental Assistance	Affordable Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	29				
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	24				
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	10	25.00%			
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	27		27	27	100.00%
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Rental Housing - Acquisition	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Rental Housing - Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	80	126	157.50%	99	4	4.04%
Rental Housing - Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Rental Housing - Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Rental Housing - Rehabilitation	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Rental Housing -New Construction	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	40	28	70.00%	54	0	0.00%
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0				
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	0				

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	6		0	6	
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	31		0	0	
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Special Needs Housing	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Other	Other	5	13	260.00%			
Supportive Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	40	0	0.00%			

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected  - Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected - Program Year	Actual – Program Year	Percent Complete
Supportive Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0				
Transitional Housing	Affordable Housing Public Housing Homeless Non-Homeless Special Needs	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	40	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Based on the objectives outlined in the County's 2019 Action Plan, Marin County's priorities were: 1) Expanding the supply of affordable housing, 2) Preserve the existing supply of affordable housing, 3) Improve public facilities and enhance access to healthy outdoor activities, and 4) Provide a variety of public services which will assist LMI households and special needs populations.

Marin County is working to expand the supply of affordable housing by acquiring real property in the county, developing new housing and rehabilitating existing affordable homes. When property is acquired, the County will deed restrict units as affordable housing. An example is the acquisition and preservation of the Piper Court Apartments, which provides 26 affordable rental homes. Additional efforts to preserve the existing housing stock available to low and moderate income residents are supported through the rehabilitation of 14 single-unit residential

homes and 143 multi-unit homes in the County.

To provide for neighborhood enhancement and safety improvements for low and moderate income communities, the County provided funds to replace play structures in a neighborhood park in San Rafael, and make flooring improvements at a childcare facility in Novato. Finally, the County provided a variety of public services that assisted LMI households and special needs populations through childcare, fair housing services, health care services, housing counseling programs, legal services, senior services, services for individuals with disabilities, and youth programs, provided by CDBG funded nonprofits and program providers. In total the CDBG program utilized \$1,358,818 in funds to address priorities and specific objectives in affordable housing, public facilities and infrastructure improvements, and public servies that assisted low to moderate income households.

Marin County will continue to leverage federal, state, and local funds, in order to support the acquisition, rehabilitation, preservation and new construction of all types of housing and to offer rental assistance to lower income households. Marin County is committed to furthering fair housing and prioritizes all projects that better align with our long-term goals for Affirmatively Furthering Fair Housing. Projects that support members of the Protected Classes, service low-income individuals, and affirmatively furthering fair housing are prioritized.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	HOME
White	6,670	10
Black or African American	956	4
Asian	654	2
American Indian or American Native	414	0
Native Hawaiian or Other Pacific Islander	122	0
Total	8,816	16
Hispanic	10,902	2
Not Hispanic	7,947	14

Table 2 – Table of assistance to racial and ethnic populations by source of funds

#### **Narrative**

Marin County assisted 8,816 families in the 2019 program year for CDBG and 16 for HOME. Based on census tract data for one CDBG capital project, 9,592 are identified as Hispanic but are not associated with a particular race. There were 441 "Other" racial families that are not reflected in the table above. With those included, for the CDBG program, approximately 72.05% of the population served was White, with about 10.33% Black, and the remaining racial groups account for about 17.62%. Of the total number of households served, about 57.84% were Hispanic/Latinx.

The current demographics of Marin County are predominantly White (80%) and Hispanic/Latinx (15.5%), which contributes to the uneven distribution of funds among racial and ethnic groups. The Priority Setting Committee has prioritized projects that Affirmatively Further Fair Housing with an emphasis on projects that benefit members of the protected classes under fair housing and civil rights laws (Source: 2012-2016 American Community Survey 5-Year Estimates). The majority of the beneficiaries of CDBG and HOME funded projects are extremely low-, low-, and moderate-income residents of Marin County.

For households served by the HOME program, the County supported the acquisition and rehabilitation 5 units of housing in a 27-unit property, and the rehabilitation of 11 units of housing for families transitioning out of homelessness.

## CR-15 - Resources and Investments 91.520(a)

#### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,005,953	
HOME	public - federal	860,017	
Other	public - federal		

Table 3 - Resources Made Available

#### **Narrative**

CDBG and HOME expenditures in the 2019 program year included the 2019 allocation of HUD federal funds, unutilized funds from previous years, and program income generated throughout the program year. Resources made available for the County through CDBG were \$2,005,953 and the amount expended through the program year was \$1,358,818. For the HOME program, resources estimated to be made available per the 2019 Annual Action Plan were \$860,017, and the actual amount expended through the program year was \$206,899. The Coronavirus pandemic and resulting shutdown of non-essential services in the County of Marin from March through early fall 2020 affected the provision of services, as well as capital/housing projects funded by the County's federal dollars.

#### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Countywide	46	16	Other
Countywide, emphasis on locations which are likely to result in increased racial & ethnic			
diversity	3	66	Other
Countywide, with an emphasis on mobilehome parks and liveaboard houseboat			
communities	29	7	Other
Countywide, with emphasis on high-need			
neighborhoods	22	11	Other

Table 4 – Identify the geographic distribution and location of investments

#### Narrative

Most projects funded were Countywide and not limited to specific geographic areas of the County, however there was an emphasis on high need areas for public services and on areas of opportunity for housing developments. Programs must serve low and moderate income residents in the County. The County makes allocations based on the level of benefit for very low, low, and moderate income

residents and provides support for activities in low and moderate-income neighborhoods. Much of the County is constrained for development, including environmental issues, Federal, State and local parks and agricultural easements. As a strategy for dealing with these constraints, the County has adopted programs in its Countywide Plan that promote opportunities for reuse of underutilized commercial centers, support mixed-use development, and encourage more dense development along transit routes. Marin County also encourages residential development in more urbanized areas or within villages in the Inland Rural and Coastal Corridors. While there is no growth boundary in effect at a countywide level, there are village limit boundaries (VLBs) in effect in the nine Coastal Zone communities of Muir Beach, Stinson Beach, Bolinas, Olema, Point Reyes Station, Inverness Ridge, Marshall, Tomales, and Dillon Beach. The VLBs were established to preserve agricultural lands for agricultural use while at the same time allowing for reasonable growth within village areas in accordance with the Coastal Act.

#### Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Marin has a history of funding many small projects with the hope of leveraging non-federal funds; however, recently there has been a focus on revising this practice. Funding fewer projects has allowed staff to focus more thoroughly on meeting CDBG and HOME program administrative requirements while also providing a higher level of technical assistance to sub-recipients than in the past. Much of the subsidized housing built in Marin County in the past decade has benefited from CDBG funding for site acquisition. The County's willingness to provide CDBG funding to new and innovative projects has had substantial local impact. In many cases, the County has provided initial funding commitments for housing projects, enabling the project sponsors to attract major funding from other funding sources.

The County's practice with HOME funds is to provide significant grant allocations in order to leverage funds and to fill funding gaps in the acquisition, new construction, and rehabilitation of housing. Most HOME-funded projects have also received grants and/or loans from the Marin Community Foundation. The former Novato and San Rafael Redevelopment Agencies, and the Affordable Housing Fund of the County of Marin have also been major sources of matching funds for HOME projects in the past. With the elimination of Redevelopment Agencies in California, a significant source of matching funds has been lost. The increasingly strict time limits on committing and spending HOME funds, combined with stricter underwriting requirements that must be met prior to committing HOME funds, have resulted in an increased emphasis locally on rehabilitation of existing housing. When a rehabilitation project is unable to raise matching funds, we cover their matching requirement with over-match from past HOME construction projects.

Fiscal Year Summary – HOME Match				
1. Excess match from prior Federal fiscal year	6,803,544			
2. Match contributed during current Federal fiscal year	0			
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	6,803,544			
4. Match liability for current Federal fiscal year	63,607			
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	6,739,937			

Table 5 - Fiscal Year Summary - HOME Match Report

	Match Contribution for the Federal Fiscal Year							
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

## **HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period						
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$		
0	11,765	10,589	0	1,177		

Table 7 – Program Income

	Total	ſ	Minority Busin	ess Enterprises		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts						
Dollar						
Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contract	:s					
Number	0	0	0	0	0	C
Dollar						
Amount	0	0	0	0	0	C
	Total	Women Business Enterprises	Male			
Contracts						
Dollar						
Amount	0	0	0			
Number	0	0	0			
Sub-Contract	s					
Number	0	0	0			
Dollar						
	1 _	ı		I		

**Table 8 - Minority Business and Women Business Enterprises** 

0

Amount

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

0

0

	Total		Minority Property Owners				
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic	
Number	0	0	0	0	0	0	
Dollar							
Amount	0	0	0	0	0	0	

Table 9 – Minority Owners of Rental Property

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations		
Displaced	0	0
Households Temporarily		
Relocated, not Displaced	0	0

Households	Total		Minority Property Enterprises				
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic	
Number	0	0	0	0	0	0	
Cost	0	0	0	0	0	0	

Table 10 - Relocation and Real Property Acquisition

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be		
provided affordable housing units	11	248
Number of Non-Homeless households to be		
provided affordable housing units	149	125
Number of Special-Needs households to be		
provided affordable housing units	5	12
Total	165	385

Table 11 - Number of Households

	One-Year Goal	Actual
Number of households supported through		
Rental Assistance	0	0
Number of households supported through		
The Production of New Units	54	0
Number of households supported through		
Rehab of Existing Units	111	385
Number of households supported through		
Acquisition of Existing Units	0	0
Total	165	385

Table 12 - Number of Households Supported

## Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Construction of affordable housing is challenging in Marin County, as well as the Bay Area as a whole. Marin County is committed to furthering fair, affordable housing, but due to a variety of factors associated with project funding, public discourse, and rising costs—funding affordable housing can take years before projects see completion. The Coronavirus pandemic has made crisis intervention a top priority, and the shutdown instituted in mid-March 2020 has made some projects impossible if not very difficult to begin or initiate. The County has been involved in a number of projects which have been

providing assistance to families facing economic crisis, and others which will increase the amount of affordable housing in the County, but these have not been funded by the 2019-20 CDBG and HOME entitlements.

For the 2019 program year, 369 households were assisted in Marin County with affordable housing programs through CDBG funds, and 16 households were assisted with affordable housing programs through HOME funds. Through CDBG funding 237 homeless were assisted through the Mill Street Emergency Shelter. Eighty (80) household were assisted from the rehabilitation of single-unit residences and 45 were from multi-unit rehabilitation projects. This assistance was provided for LMI households.

For the special needs population (elderly and disabled persons), 12 households were served through affordable housing rehabilitation by the CDBG program. These units were Lifehouse Sunrise II (1 unit), and Lifehouse Fairfax-Comito (1 unit).

The Oma Village project which includes 11 HOME-funded units for formerly homeless families, was completed during the year, and is also included in the figures above.

#### Discuss how these outcomes will impact future annual action plans.

Because of the lengthy delays in new affordable housing construction, the Priority Setting Committee has prioritized funding fewer projects which are ready to move forward more quickly and will consider funding acquisition and conversion of existing housing to permanently affordable housing as a way to fund projects and see more immediate results. Once the pandemic begins to subside, and activity starts to reach a more normal level, our intention is to support the initiation or completion of the affordable housing projects covered by allocations from the 2019-20 program year.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	298	13
Low-income	56	3
Moderate-income	15	0
Total	369	16

Table 13 - Number of Households Served

#### **Narrative Information**

In 2019, Marin County recorded 369 LMI households assisted through CDBG, and 16 LMI households assisted through HOME.

The County has prioritized funding and supported affordable housing assistance for extremely low-

income, low-income, and moderate-income. The County's Rehabilitation Loan program provides loans to low, very low and extremely low-income homeowners, thus preserving the existing housing stock for these groups. The County enhances the affordable housing landscape by providing funding through the County Affordable Housing Fund for the Below Market Rate homeownership and down payment assistance programs for first-time homebuyers, providing opportunities to households with low and moderate incomes. The County Affordable Housing fund money is used to prioritize housing developments that include, low income, extremely-low income, and families with children, elderly, disabled and homeless populations

The County has leveraged its position as a funder of local, affordable housing development to advocate for housing projects. In 2019 the County developed a Request for Proposal of \$[insert] of Mental Health Services Act funds to encourage the generation of projects that create new housing opportunities for individuals who are victims of domestic violence, people who have developmental disabilities, and affordable senior housing including those with special needs. Additionally, the County initiated a development of a \$[insert] Request for Proposals (RFP) to develop affordable, family housing in areas of opportunity. The County has prioritized increasing tenant protections and reducing displacement by adopting tenant protections including, Just Cause for Eviction to provide stability for renter households, a Rental Housing Dispute Resolution program to deter dramatic rent increases and a Fair Housing source of income ordinance to prohibit discrimination of tenants and prospective tenants with third-party rental subsidies (section 8, VASH Vouchers, etc.).

## CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

## Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The County's Department of Health and Human Services coordinates the Continuum of Care (COC) through the Homeless Policy Steering Committee. The committee is responsible for administering funding for homeless services and housing in the County. The County actively plays a role in reaching out to homeless persons to assess their needs. One such activity is the Point-In-Time (PIT) survey, conducted every two years, which helps ascertain the number of homeless living throughout the County. On January 28, 2019 a PIT survey conducted reported 1,034 homeless persons in the County with 68 percent of the homeless population being unsheltered. Other indicators recorded in the survey are the demographics of the homeless population, what caused homelessness, health conditions and types of services they currently access and are interested in accessing. The results of the PIT survey help the COC to determine what services are needed for the homeless in Marin County for the year. The COC has many participants that help with outreach to the homeless in Marin County, with each being specialized in a particular area of to assist the homeless. These participants include Adopt A Family, Buckelew Programs, Center Point, Inc., Center for Domestic Peace, Community Action Marin, Downtown Streets Team, Homeward Bound Marin, Marin County Council of Mayors and Councilmembers, Marin County Office of Education, Marin Housing Authority, Marin Organizing Committee, Ritter Center, St. Vincent de Paul Society of Marin, Spahr Center, Side by Side Transitional Age Youth, and the US Department of Veteran Affairs. Several County agencies and the City of San Rafael also play an active role in reaching out to the homeless as part of the COC. Furthermore, the goals of the COC call for a coordinated approach to reaching out to homeless in the County. They are:

- Promote a community-wide commitment to the goal of ending homelessness
- Provide and coordinate funding for efforts to assist homeless individuals and families
- Promote access to and effective use of mainstream programs
- Optimize self-sufficiency among individuals and families experiencing homelessness

#### Addressing the emergency shelter and transitional housing needs of homeless persons

The need for emergency shelters remains high in Marin County. Every two years the County with its partners conducts a Point-In-Time survey for the homeless population in the County. According to the Point-In-Time Census, in 2019 there were 1,034 homeless individuals living in the County with approximately 68 percent living unsheltered.

To address this need, the COC's partner, Homeward Bound manages two emergency shelters in the County, the Mill Street Center (MSC) and the Homeward Bound Family Center. MSC provides 55 beds

for single adult men and women and the Family Center has 9 rooms for families with children. Another agency which helps to address homeless persons in need of emergency shelters is the Center for Domestic Peace which has 30 beds available for emergency housing for persons experiencing domestic violence. Shelter residents receive supportive services and medical assistance, food and clothing, children's services if needed, housing assistance, and transportation. The County is proud to have supported the rehabilitation of the Mill Street Emergency Shelter, which served 237 families in the 2019-20 year.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The County runs several programs to assist low-income and at-risk individuals and families from becoming homeless. The County has a Homeless Policy Analyst who coordinates the COC application, the Point In Time Count, the 10-Year Plan to End Homelessness and other homeless services. Marin County and partners, such as Fair Housing Advocates of Northern CA, Legal Aid of Marin, the Marin Housing Authority, Homeward Bound of Marin, and St. Vincent De Paul, deliver services and assistance to these individuals and families through programs designed to help prevent housing instability. Marin County has spearheaded data-sharing efforts and collaborative case-conferencing around health care, mental health, and correctional facilities, and coordinating a system to connect people being discharged from institutions to a case manager rather than being released to the street. All institutions can act as entry points to Marin's Coordinated Entry system, providing or referring clients for assessments to connect them to homeless housing resources.

Marin has a healthcare discharge planning process carried out by nonprofits and coordinated with local hospitals/clinics/emergency rooms and the County Health & Human Services Department (HHS). The protocol coordinates the health care system to prevent discharges into homelessness and provides case management to homeless persons receiving treatment from hospitals and other healthcare sites. The County's healthcare system actively participates in the discharge planning protocol and medical respite program.

The County funds multiple re-entry programs including transitional housing for people on probation, Custody to Community re-entry case management, and medical respite care providing shelter to clients being discharged from hospitals. Marin County is engaged with hospitals in response to SB 1152, the California legislation mandating discharge plans from emergency rooms for people experiencing homelessness.

Alternative Family Services operates an Independent Living Program designed to ensure that persons discharged from the foster care system do not exit into homelessness. This program connects transitionaged youth to services which support the emotional, practical, and social skills necessary to live independently. The program also offers subsidized housing for youth lacking family and other support

systems, housing placement assistance, education and employment assistance, public assistance, and mental health services.

Marin County's Behavioral Health and Recovery Services (BHRS) coordinates a process for discharges from mental health care. The BHRS Adult System of Care has developed housing programs with Buckelew Programs, Center Point, Homeward Bound of Marin, and the Marin Housing Authority. BHRS utilizes local, state, and federal resources (including HUD funds) to contract with providers who create a range of housing options for mentally ill clients leaving institutional settings.

The Jail Discharge team coordinates a discharge program that includes the County jail and State facilities. A re-entry coordinator links inmates with the Custody to Community program which ensures access to stable housing. Custody to Community provides case management with a focus on access to benefits, employment and housing. The Discharge team collaborates with Center Point through a CA Dept. of Corrections contract to screen & assess prison inmates returning to Marin County. Center Point assesses inmates' need for substance abuse treatment, housing, mental health counseling, vocational & other supportive services. It develops discharge & aftercare plans, coordinating with parole agents of record, and performs follow-ups after release.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Affordable housing, especially for families coming out of homelessness is a critical priority. In 2019, 15% of the homeless population in Marin County resided in transitional housing. The County and its service providers help deliver services and assistance to those currently experiencing homelessness through federal and local programs. These services work to enable individuals and families to obtain benefits and support, such as job training and placement, helping the homeless get back to self-sustainability. Some of the programs include: Homeward Bound of Marin ADULT Services Program, which provides 24-hour counseling to homeless persons wishing to end their homelessness; Oma Village, a project funded by the County for multiple years, continues to provide permanent supportive housing to families who were formerly homeless; King Street Senior Housing, a project funded by the county provides permanent supportive housing to formerly homeless older adults; Center for Domestic Peace's Second Step, a long-term transitional living facility for women and their children who have experienced homelessness due to domestic violence, provides women and their families time to rebuild their lives and get support and resources to achieve self sufficiency, including support groups, referrals for their unique needs, and family advocates for crisis intervention.

In alignment with Housing First, Marin County is creating permanent supportive housing for the most vulnerable chronically homeless individuals and families. In the past year, Marin has created more permanent supportive housing beds, many with low 17-to-1 case management ratios to serve the highest need, hardest to serve individuals, and families experiencing chronic homelessness. In addition,

Marin has converted all of its Continuum of Care beds to be either dedicated or prioritized for people who are chronically homeless. Marin has also developed multiple programs that engage and provide services for chronically homeless individuals and families, including the Whole Person Care Medicaid waiver program, which provides Assertive Community Treatment-style housing case management and mild to moderate mental health case management; the Homeless Outreach Team, which provides targeted, housing-based case management to chronically homeless individuals who are reluctant to engage in the system of care; and outreach coordination and case conferencing to improve geographic coverage of outreach, prevent duplication of services, and identify chronically homeless individuals and families who need more intensive outreach.

Marin County has increased its coordination with the VA to secure additional VA services and new HUD-VASH housing vouchers. Marin has also coordinated with Swords to Plowshares to bring SSVF rapid rehousing to Marin for the first time. County Health & Human Services has added a veteran outreach worker to connect homeless veterans to the homeless and VA systems of care. Marin is partnering with a local homeless service provider and local governments to develop new veteran housing on a former Air Force base.

Marin County is working to transform our youth system of care through increased collaboration and case conferencing to serve the most vulnerable, highest-need Transitional Aged Youth individuals and families. Marin has connected providers and youth with current or former experience with homelessness to map out the youth system of care and identify barriers to service and systems gaps. Marin County BHRS funds a full-service partnership for youth with mental health issues. Through state Homeless Emergency Aid Program funding, Marin is partnering with a Community Based Organization to include new permanent supportive housing for youth as part of a site-based development project.

## CR-30 - Public Housing 91.220(h); 91.320(j)

#### Actions taken to address the needs of public housing

The Marin Housing Authority (MHA) administers approximately 2,100 Section 8 Voucher holders and 500 public housing units, as well as a residential rehabilitation loan program, various homeownership programs, and several programs that provide supportive services to special needs groups. MHA is the primary source of housing for very low-income households in Marin County. Section 8 voucher recipients are located throughout the County, and the public housing is located in six complexes, of which one, Marin City, is a general occupancy complex which serves families and the other five are for senior and disabled residents.

As part of the PHA Agency Plan process, MHA and its Board of Commissioners, with input from the Resident Advisory Board, have identified seven key goals. Each of these broad goals consists of several practical sub-goals designed to help MHA meet its targets over the next five years. The seven main goals are:

- 1. Maximize affordable housing options in Marin County.
- 2. Enhance services to clients, business partners and the community at large through delivery of efficient and responsive programs.
- 3. Continue to build collaborations with other agencies, local jurisdictions, and the private sector.
- 4. Implement asset management for public housing.
- 5. Access additional resources for new development of affordable housing and for the rehabilitation/modernization of existing MHA housing stock.
- 6. Continue to work with residents/participants to build community and self-sufficiency.
- 7. Explore ways to improve energy efficiency for public housing.

## Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

MHA's Resident Advisory Board (RAB), comprised of public housing community residents, make recommendations on the PHA Agency Plan. RAB provides MHA and the residents with a forum for sharing information about the Agency's Annual Plan. The role of the RAB has been to assist the PHA in developing the PHA Plan and in making any significant amendments or modifications to the Plan. MHA worked with the Resident Advisory Board to help assist with the 2017 Agency Plan, which included the advisory board's comments.

### Actions taken to provide assistance to troubled PHAs

The Marin Housing Authority is a High Performer PHA.

## CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

While the unincorporated County comprises a large land area, most of the land is not zoned for residential development, as it is publicly owned as parkland, watershed, or open space. Agricultural conservation easements and related zoning also limit the ability to develop vacant lands. Remaining vacant lands zoned for residential uses tend to have significant environmental constraints, which either substantially increase construction costs or preclude development altogether, including sites with steep slopes or wetland habitats. As a strategy for dealing with these constraints, the County has adopted programs in its Countywide Plan that promote opportunities for reuse of underutilized commercial centers, support mixed-use development, and encourage more dense development along transit routes. Marin County also encourages residential development in more urbanized areas or within villages in the Inland Rural and Coastal Corridors. The Board of Supervisors directed Community Development Agency staff to form a citizen advisory group to evaluate strategies and opportunities for improvements to the County's development review process. This group, referred to as the Regulatory Improvements Advisory Committee (RIAC), completed a report with its findings to help inform the County's future efforts to improve its development review process, which were reviewed by the public and the Board of Supervisors prior to implementation. The County's Housing Element also evaluates barriers and includes programs to address these barriers.

### Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

CDBG and HOME funds were used to fund a variety of programs for low-income and disabled people. The use of CDBG Public Service funding is heavily targeted towards very low-income people including services for minority populations in the Canal, Marin City, and Southern Novato areas. In particular, the childcare and youth programs in Southern Novato have adjusted their programs to serve the Hispanic/Latinx families and their children. Childcare and youth programs in San Rafael, Novato, Marin City also serve a large percentage of Hispanic/Latinx families. In 2019, Marin County supported critical programs focused on legal services for families subject to domestic violence and threats of eviction, educational services for community residents, as well as neighborhood facilities improvements. Another underserved population is the elderly population in Marin County. The County funded the Novato Independent Elders Program, Skyview Dayclub program, and the West Marin Senior Services to provide case management, nutrition/activity and support services to seniors including those that are homebound, and those suffer from memory loss and dementia.

#### Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

To evaluate and reduce lead-based paint hazards, the County will require all recipients of HUD funding

to comply with the requirements for lead paint testing and abatement. The Marin Housing Authority will also continue its program of lead paint testing and abatement for public housing.

The Marin County Department of Health and Human Services operates the Childhood Lead Poisoning Prevention Program reaching out to workers about how to protect themselves and their loved ones. On the job, workers need to protect themselves from exposure to lead dust. At home, workers can carry dust on their clothing back to their homes and expose their children to lead. The CLPPP responds to cases of childhood lead poisoning with assistance from the Marin County Community Development Agency's Environmental Health Services (EHS). EHS is charged with the responsibility of following up on complaints regarding violations to lead safe work practices.

The Marin County Department of Health and Human Services operates the Lead Poisoning Prevention Program and reaches out to workers about how to protect themselves and their loved ones. On the job, workers need to protect themselves from exposure to lead dust. At home, workers can carry dust on their clothing back to their homes, and expose their children to lead.

#### Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

CDBG Public Service funds have been invested in youth programs, such as Performing Stars, the Afterschool Transportation Program at Fairfax San Anselmo Children's Center, North Bay Children's Center, Novato Youth Center, and Pickleweed Children's Center which should lead to participating children performing better in school, and thereby having greater opportunities to earn higher incomes. The MHA manages the Family-Self Sufficiency (FSS) Program, which offers case management services for families in the Section 8 program and residents of the Marin City public housing complex who are working to achieve educational and employment goals to become independent of public assistance.

### Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Marin County's institutional structure for implementing its housing and community development plan includes a combination of public and private nonprofit agencies, with some participation from the forprofit sector. The Marin County Community Development Agency, part of the County government, is responsible for administration of the CDBG and HOME Programs. The CDBG Countywide Priority Setting Committee, which includes members of city councils and non-elected community representatives of protected classes, and is chaired by a member of the Board of Supervisors, makes recommendations for the use of these funds. Final decisions about the use of CDBG and HOME funds are made by the Marin County Board of Supervisors.

The County of Marin's Housing and Federal Grants Division of the Community Development Agency was merged previously to provide better coordination and facilitate the development of affordable housing through technical assistance, advocacy, and opportunities for funding through the Federal Grants Division. In addition, the County Health and Human Services Department has a policy analyst who plans and implements housing and service programs for homeless people and extremely low-income people who are precariously housed.

The County Community Development Agency and the County Department of Health and Human Services have collaborated on the use of state funds for a residential facility for disabled residents. The

County has consolidated its mental health and substance abuse treatment services, to better serve clients who have both types of needs. The County has instituted a mid-management training program that helps to improve communications between mid-level staff in different departments. In February 1995 and again in May 2012, the Marin County Board of Supervisors adopted a policy to reduce the number of projects funded by the Community Development Block Grant Program, so that funds could more effectively be focused on a limited number of housing and public service activities, and this policy has been implemented and maintained. However, a further reduction in the number of CDBG projects may be needed to keep administrative expenses within the limits established by the CDBG regulations.

## Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Staff from the Housing and Federal Grants Division work closely with nonprofit and social service agencies and have been active members of the Nonprofit Housing Association of California. Staff are also members of the Homeless Policy Steering Committee, Opening Doors Coalition, and Housing Acquisition Group.

## Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The County has taken a proactive role in addressing fair housing choice, including:

- 1. Hiring a Social Equity Program and Policy Coordinator to focus on furthering fair housing and supporting equity programs.
- 2. Requiring affirmative fair housing marketing plans from all housing programs.
- 3. Requiring collaborating County agencies such as the Health & Human Services, Marin County Free Library, Probation Department, Parks Department, Human Resources and the County Adminstrator's Office to undertake equity initiatives to ensure all citizens in Marin County have full and equal access.
- 4. The Priority Setting Committee established priorities for funding projects which affirmatively further fair housing and serve members of the protected classes.

Marin County has also set aside funding for the upcoming Assessment of Fair Housing (AFH), which is being conducted to help guide fair housing efforts in the County. The AFH will identify specific barriers and contributing factors to fair housing choice and disaparities in access to opportunites in the County. The AFH will then help to develop strategies to address and overcome these barriers.

### CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Staff from the Housing and Federal Grants Division perform a risk analysis to select projects for on-site monitoring. The County has a standard list of questions that are asked during monitoring visits and we have been putting an increased emphasis on affirmative marketing.

The main procedure for monitoring is on-site visits, most of which are conducted in the period between December and March in conjunction with the County's annual proposal review and budget-setting process. Project monitoring is performed by the same staff representative who administers the project contract and approves billings from the project sponsor. This helps integrate monitoring with the County's ongoing efforts to provide assistance, advice, and support to the project sponsors. The goal is to conduct a monitoring visit of each project within a two-year cycle. Marin County identifies high-risk subrecipients and targets them for more frequent on-site programmatic and fiscal monitoring.

Financial information is requested on an annual basis from rental properties that have received support from CDBG and HOME entitlements. Rent rolls and financial reports are reviewed to determine if further and more specific monitoring is required to ensure compliance with the terms of the program agreements.

#### Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Due to the Coronavirus pandemic, all receipients of CDBG and HOME funds were granted an extension of the 2019 CAPER deadline to 180 days after the close of the 2019-20 fiscal year. Marin County requested and received authorization to extend that deadline to January 31, 2021. The 2019 CAPER was made available to the public for a period of 15 days starting on Monday, January 11, 2021. Translation services were also made available by the County. Public comments were accepted until Friday, January 29th. The 2019 CAPER was submitted on January 31, 2021.

### CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

As a result of the Coronavirus pandemic, several affordable housing projects have experienced significant delays, and staff are evaluating ways to address any barriers that exist for affordable housing developers and considering ways to prioritize projects which may be more likely to move forward. As expected, some circumstances are not within the control of subrecipients who received allocations. It is anticipated that circumstances will improve and the pandemic improves. At this time, no changes are expected for program objectives.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

### CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The County customarily inspects all sites that apply for funds during the application/allocation cycle, unless the vendor provides public services and received current year funding for which there was a site visit in the prior cycle. The County's main procedure for monitoring capital improvement or housing projects in on-site visits. The County's goal is to conduct a monitoring visit of each project at appropriate intervals depending on the number of units per HOME guidelines. We identify high-risk subrecipients and target them for more frequent on-site programmatic and fiscal monitoring.

The following acquisition/rehabilitation project sites were monitored in 2019-20: Mill Street Emergency Shelter (activity 1034), Piper Court (activity 1011), Victory Village (activity 1026), and Galilee Harbor (activity 546). No compliance issues were identified. Prior to the Coronavirus pandemic, several projects were slated to monitored: San Clemente Apartments, Toussin Senior Housing, Fireside Apartments. However, due a waiver of the HOME on-site monitoring requirements to determine compliance with rental property standards, these on-site inspections were delayed.

## Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Housing and Federal Grants Division instituted a requirement of all current subrecipients requiring formal submission and approval of an Affirmative Marketing Plan tailored to the specific project.

# Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

Marin County receives nominal amounts of program income, usually unanticipated paydowns of accrued interest on HOME or CDBG loan balances. Program income is included in the annual planning cycle, and most often allocated to on-going projects.

HOME program income was drawn against in 2019-20 for the King Street and Piper Court Apartments projects.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

Not applicable.