



# City of Pomona

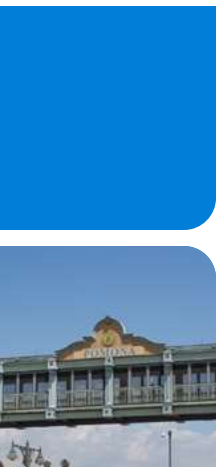
Consolidated and Annual Action Plan

## 2023-2028 Consolidated Plan and 2023-2024 Annual Action Plan

Improving the quality of life for our  
diverse community

**Presented to: The United States Department of Housing and Urban Development**

*Prepared by: City of Pomona, Neighborhood Services Department  
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**Adopted By City Council on June xx, 2023**

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## I. EXECUTIVE SUMMARY

### ES-05 EXECUTIVE SUMMARY – 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction Community Profile

The City of Pomona is located in Los Angeles County, and can be accessed by five major thoroughfares: the San Bernardino Freeway (10), the Pomona Freeway (60), the Orange Freeway (57), the Corona Expressway (71) and the Foothill Freeway (210). It is approximately 31 miles east of downtown Los Angeles and 43 miles northeast of the Port of Long Beach. It is located in the Pomona Valley at the base of the San Gabriel Mountains. With a population of 151,713, Pomona is the 37th most populated city in the state of California out of 1,523 cities. In 2021, the median household income of Pomona residents was \$70,494. The median age for Pomona residents is 32.9 years young. The largest Pomona racial/ethnic groups are Hispanic (71.4%) followed by Asian (10.8%) and White (10.3%)

#### Purpose of the Consolidated Plan

The City of Pomona's 2013-2028 Consolidated Plan is a five-year comprehensive strategy. It coordinates all elements of planned community development in the City, including: housing, neighborhood development, economic development and public services. These elements represent a plan and vision of community development activities to be undertaken with respect to Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME), and Emergency Solutions Grant (ESG) Programs.

The Consolidated Plan serves the following functions:

- As a planning document for the City, based on a participatory process;
- An application for Federal funds under HUD's formula grant programs;
- A strategy for housing, homelessness, community development, and economic development; and
- An Action Plan that provides a description of annual projects/activities the City will undertake to carry out strategies to meet priority needs.

It includes four major components:

- Needs Assessment (Housing, Homeless, Non-Homeless, Non-Housing Needs);

- Housing Market Analysis;
- The Housing and Community Development Five-Year Strategic Plan; and
- The One-Year Action Plan

Each component serves a specific purpose. The Housing Market Analysis and Needs Assessment components provide an overview of the housing market and other non-housing needs which assists the City in short and long-term planning. After identifying needs, the City sets priorities for its CDBG, HOME, and ESG Programs. Priorities are based on community needs and the advice of citizens, community agencies and other stakeholders. The Strategic Plan identifies objectives and outcomes for priority needs. The Action Plan proposes how to invest CDBG, HOME and ESG funds for the coming year to accomplish such objectives.

### **Goals of the Consolidated Plan**

The Consolidated Plan states the City's intent to pursue the following goals and objectives of the Community Planning and Development (CPD) Programs of the U.S. Department of Housing and Urban Development (HUD):

1. To ensure decent housing;
2. To create and maintain a suitable living environment; and
3. To expand economic opportunities.

The City has identified ten priority needs areas to meet housing and community development goals. Priorities are based in part on responses to the 2023 Community Needs Survey and the Fair Housing Survey conducted as part of citizen participation outreach efforts, including information gathered in specific focus groups, and interviews with various organizations and service providers in the housing and community development field. The City will CDBG, HOME, ESG, and other resources to address needs in the following priority areas:

### **Priority Needs**

Based on stakeholder input and community surveys, the following are a list of priorities the City will focus on during the 2023-2028 Consolidated Plan cycle:

1. Housing
2. Homelessness



3. Special Needs/Non-Homeless
4. Anti-Crime
5. Economic Development
6. Infrastructure and Public Facilities Improvements
7. Public Services
8. Fair Housing
9. Code Enforcement
10. Housing Services

## 2. **Summary of Goals, Objectives and Outcomes**

The 2023-2028 Consolidated Plan coincides with HUD's goals to: 1) ensure decent housing; 2) create a suitable living environment; and 3) expand economic opportunities. It further outlines the City's planned goals, outcomes and objectives to meet priority needs. A summary of the City's specific goals, objectives and outcomes are:

### **Goals**

Goal 1: Promote Fair Housing Opportunity

Goal 2: Expand Affordable Housing Supply

Goal 3: Create and Preserve Affordable Housing

Goal 4: Support Homeless Services Activities

Goal 5: Planning and Program Administration

Goal 6: Neighborhood Preservation and Eliminate Blighted Conditions

Goal 7: Support Activities that Assist with Basic Needs and Provide Quality Services

Goal 8: Improve Infrastructure and Public Facilities

Goal 9: Expand Economic Opportunities/Employment Training

### **Objectives and Outcomes**

Objective 1: Preserve existing housing stock through single-family housing rehabilitation

Outcome: Availability/accessibility of decent housing to low-income persons

Objective 2: Preserve at-risk housing stock through Mobile Home Rehabilitation

Outcome: Availability/accessibility of decent housing to low-income persons

Objective 3: Preserve rental housing stock through multi-family housing rehabilitation

Outcome: Availability/accessibility of decent housing to low-income persons

Objective 4: Restore and preserve properties of special historic value

Outcome: Sustainability of decent housing for low-income persons

Objective 5: Further Fair Housing Efforts

Outcome: Availability/affordability/accessibility of decent housing for low-income persons

Objective 6: Increase affordable housing opportunities through CHDOs

Outcome: Affordability of decent housing to low-income persons

Objective 7: Increase affordable housing opportunities to first-time homebuyers

Outcome: Affordability of decent housing to low-income persons

Objective 8: Increase affordable rental housing opportunities through rental assistance

Outcome: Affordability of decent housing to low-income persons

Objective 9: Increase the supply of affordable housing through acquisition and rehabilitation

Outcome: Availability/accessibility decent housing to low-income persons

Objective 10: Conduct code enforcement in targeted areas to prevent slum/blighted conditions

Outcome: Sustainability of decent housing to low-income persons

Objective 11: Reduce the number of housing units with lead-based paint hazards

Outcome: Availability/accessibility decent housing to low-income persons

Objective 12: Increase access to permanent housing for the homeless through rapid re- housing

Outcome: Availability/accessibility of decent housing to low-income persons

Objective 13: Increase access to housing through rental assistance/homeless prevention activities

Outcome: Availability/accessibility of decent housing for low-income persons

Objective 14: Record homeless statistical data (HMIS)

Outcome: Availability/accessibility of data on suitable living environment for low-income persons

Objective 15: Improve access to homeless essential services through street outreach

Outcome: Availability/accessibility of services for a suitable living environment for low- income persons

Objective 16: Encourage linkage of emergency shelters to permanent housing  
Outcome: Availability/accessibility of shelter services for a suitable living environment for low-income persons

Objective 17: Improve overall infrastructure of low-to-moderate income neighborhoods

Outcome: Availability/accessibility of improved public infrastructure for a suitable living environment for low-income persons

Objective 18: Improve recreational and community facilities located in low-to-moderate income neighborhoods

Outcome: Availability/accessibility of improved parks/neighborhood facilities for a suitable living environment for low-income persons

Objective 19: Improve ADA accessibility throughout the City

Outcome: Availability/accessibility of improved ADA access for a suitable living environment for low-income persons

Objective 20: Improve access to public services for special needs and at-risk population

Outcome: Availability/accessibility of services for a suitable living environment for low- income persons

Objective 21: Improve public safety through crime prevention oriented policing  
Outcome: Availability/accessibility of services for a suitable living environment for low- income persons

Objective 22: Improve access to services through housing services and counseling

Outcome: Availability/accessibility of services for a suitable living environment for low- income persons

Objective 23: Provide administration/management of grant funds and program delivery

Outcome: Availability/accessibility of services for a suitable living environment

Objective 24: Increase economic opportunities that create or expand job opportunities

Outcome: Affordability of economic opportunities of jobs for low-income persons

**SEE APPENDIX C: SUMMARY OF ANNUAL GOALS AND OBJECTIVES FOR DETAILED INFORMATION ON ACTIVITIES, PROPOSED FUNDING AND PLANNED OUTCOMES**

**3. Evaluation of Past Performance**

The City of Pomona is in the fifth year of its current Consolidated Plan period FY 2022-2023 (2018-2023) and has maximized resources available to meet priority community development and housing needs to ensure decent housing, a suitable living environment, and economic opportunities. During FY 19-20, the City achieved the following, which can be found in the 21-22 CAPER online at the City's website (FY 22-23 is still underway):

**Housing**

- CDBG funds were allocated for a Housing Improvement Program that included Emergency Repair and Facade Improvements. A total of 7 homes were rehabilitated utilizing these funds.
- 3 mobile homes were rehabilitated through the Housing Rehabilitation Program utilizing State CalHOME funding.

- HOME funds were used to provide homeownership assistance (down-payment and/or closing costs) for 3 first-time homebuyers;
- CalHOME funds were used to provide homeownership assistance (down payment and/or closing costs) for zero first-time homebuyers;
- HOME funds were used to rehabilitate 6 housing units to provide decent affordable housing to low-income households;
- 33 single-family homes were rehabilitated through the Housing Rehabilitation Program utilizing CDBG and HOME funding.
- During FY 2021-2022, Lead Hazard Reduction and Healthy Homes Funds were used to continue the Lead Education, Awareness and Control (LEAC) Program over a three-year grant period to abate lead hazards in units occupied by low-income households. A total of 33 housing units received lead remediation assistance.

### **Homelessness**

- For FY 2021-2022, the City was awarded \$177,141 in ESG funds. Funded categories included emergency shelter operations and homeless management information systems. A total of 85 eligible persons were served during FY 2021-2022 with ESG funds.

### **Public Services**

- Providing public services, including youth services for tutoring, after-school activities, sports programs, dental assistance, parenting/communication classes, outdoor programs, JROTC activities, music program youth employment and fair housing services to over 1,550 persons.
- Distribution of a Community Needs Survey soliciting input on community needs from over 43,500 households for FY 2021-22 Annual Action Plan activities. The City received 216 survey responses.

### **Community Development**

- Providing 1,365 residential housing unit inspections for health and safety violations through the City's Code Enforcement Division.

The City continues to carry out its programs as identified in its approved Consolidated Plan. To date, the City has allocated all funding sources to complete programming outlined in annual Action Plans. The City has provided all requested certifications as required by HUD and have been fair and impartial to entities applying for federal funds



to assist in program implementation. The City has not hindered Consolidated Plan implementation through either willful action or through inaction.

**4. Citizen Participation Process and Consultation Process**

From March 31, 2023 through May 1, 2023, the City published a public notice in the local newspaper informing interested persons about the Consolidated Plan and Annual Action Plan review/comment period. (See Appendix D for a copy of the public notice)

Access to Information/Availability to the Public: As required by Federal regulations, the Consolidated Plan and Annual Action Plan was made available at the following locations: City Hall Clerk's Office – 2nd Floor; Neighborhood Services Department – Housing Division- 1st Floor; City of Pomona Library, Resources Desk, 625 South Garey Avenue, Pomona, CA, 91766; and the City of Pomona Website.

**5. Summary of Public Comments and Impact to Goal Setting**

The City received public comments as referenced in Appendix J. Comments have been taken into consideration in the development of the Consolidated Plan and Action Plan as part of the strategies and activities to meet those community needs. The comments represent comments made by stakeholders through the community needs survey, a public council meeting, a public hearing and the 30-day comment period. Comments with eligible activities for the CDBG, HOME or ESG Programs and that were identified as having a high priority needs, have been incorporated into the Consolidated Plan and Annual Action Plan.

The Consultation and Citizen Participation Process provided outreach to various organizations, agencies, service providers and residents, and included methods for gathering input. The impact to goal setting through the consultation was improved communication between the City and its partnering agencies, as well as basic citizen input. The overall goal was to provide a method for input regarding community development and housing needs which assisted in goal setting.

**SEE APPENDIX J: SUMMARY OF PUBLIC COMMENTS**

6. **Summary of Comments or Views Not Accepted**

None

7. **Summary**

In conclusion, the Citizen Participation component of the Consolidated Plan requires major outreach to citizens and other stakeholders. The City of Pomona makes every effort to reach the greatest number of people possible to solicit input on community development and housing needs.

All public comments received were incorporated in the Consolidated Plan.

## II. THE PROCESS

### PR-05 LEAD & RESPONSIBLE AGENCIES – 24 CFR 91.200(B)

#### 1. Describe the agency responsible for preparing the Consolidated Plan

A completed Consolidated Plan describes the lead agency responsible for overseeing the development and implementation of the plan, as well as agencies, groups and organizations that participate in the process. It also includes a summary of the citizen participation process, public comments, and efforts made to broaden public participation in preparing the plan.

The City of Pomona's Community Development Department – Housing Division is the lead agency in the development and implementation of the Consolidated Plan.

Agency Role	Name	Department/Agency
CDBG Administrator	City of Pomona	Neighborhood Services Dept.
HOPWA Administrator	N/A	N/A
HOME Administrator	City of Pomona	Neighborhood Services Dept.
ESG Administrator	City of Pomona	Neighborhood Services Dept.
HOPWA-C Administrator	N/A	N/A

**Table 1 – Responsible Agencies**

#### 2. Consolidated Plan Public Contact Information

Beverly Johnson, Housing Services Manager  
 City of Pomona  
 Neighborhood Services Department, Housing Division 505  
 S. Garey Avenue, Pomona, CA 91766  
 Phone: (909) 620-2368

**PR-10 CONSULTATION – 24 CFR 91.100, 91.200(b), 91.215(l)****1. Introduction****Activities to Enhance Coordination Among Public and Private Agencies**

The City of Pomona's Consolidated Plan is a result of consultation with a wide spectrum of public and private agencies. During the pre-submission phase, the City consulted with several agencies to determine community needs, gaps and asset inventory. A public notice was published informing Citizens, Community-Based Organizations, City Departments and the business community of the Consolidated Plan Development process and requirements for submitting project proposals. A Needs Assessment Survey was also distributed citywide to receive community input.

Methods used during the consultation process included hosting stakeholder focus groups that included a broad range of internal departments, external agencies and non-profit organizations. In addition, the City held a public hearing, conducted one-on-one personal interviews, and telephone interviews with key stakeholders.

**Consultation with the Continuum of Care and Efforts to Address Homelessness**

The City of Pomona is within the Greater Los Angeles Continuum of Care (COC ID CA-600). The Los Angeles Homeless Services Authority (LAHSA) is the lead agency for the Continuum. The City attends quarterly COC meetings, Entitlement Cities Meetings, and is a regional representative on the LAHSA Coordinating Council. The City also attends the LAHSA Commission meetings regularly and makes presentations to the Commission on the City's Consolidated Plan, Annual Action Plan and City specific homeless data, issues, challenges and successful efforts. At the quarterly COC Meetings, the City gains information and provides feedback and input to LAHSA's inquiries and plans. The City also participates in the County of Los Angeles Homeless Initiative strategic planning process.

The City participated in the 2005, 2007, 2009, 2011, 2015-2020, and 2022 Point in Time Homeless Counts. The City hosts the deployment sites, provides the deployment site coordinator, and recruits and trains volunteers. The City ensures that bed inventory data is provided for the Point in Time count. In collaboration with LAHSA, the City conducts a demographic survey to provide demographic and subpopulations data at the City level. For planning purposes, the homeless population is also asked about their housing preferences.

### Consultation with the Continuum(s) of Care to Determine ESG Allocations

The City will continue to participate in meetings conducted by the Los Angeles Homeless Services Authority, the LA CoC lead agency, specific to implementation of the Emergency Solutions Grant. The city provides data and input to the CoC ESG planning process. The LA CoC, has adopted a Coordinated Entry System (CES), the Homeless Family Solutions System and the Youth CES. The City of Pomona Homeless Outreach Program is a regional host site for the LA COC Coordinated Entry System (CES) for this program. The City of Pomona's Homeless Program Supervisor sits on the LAHSA Coordinated Entry System Council and the San Gabriel Valley Council of Governments (SGVCOG) Homelessness Committee and Homeless Workgroup.

The City gathers input from the local Pomona Continuum of Care Coalition (PCOCC). This coalition of about 40 local service providers, residents and homeless individuals includes faith-based groups, non-profit organizations, shelters and transitional housing providers, and state, county and City departments that provide assistance for homeless persons. The City provides community information and feedback presentations at the PCOCC meetings. The City also sends out a survey to the entire community annually to gather community input specific to prioritization of services and housing for the homeless and those at risk of homelessness. The PCOCC hosts an annual Community Input Meeting for the Annual Action Plan.

## 2. Agencies, Groups, Organizations that Participated in the Process

The following matrix provides a snapshot of agencies that participated during the consultation process:

24 CFR	Agency Type	• Agency Consulted
91.100(a)(1)	Housing Services	• Neighborhood Partnerships Housing Services, Inc. (NPHS)
	Fair Housing Services	• Housing Rights Center
	Homeless Services	• Los Angeles Homeless Services Authority (LAHSA) • Inland Valley Hope Partners • Pomona Continuum of Care Coalition • House of Ruth, Inc.



	Social/Health Services	<ul style="list-style-type: none"> <li>• Tri-City Mental Health Clinic</li> <li>• Assistance League of Pomona Valley</li> <li>• Claremont Afterschool Program, Inc.</li> <li>• House of Ruth, Inc</li> <li>• Lincoln Avenue Reform Church</li> <li>• Pomona Unified School District</li> <li>• Services Center for Independent Living</li> <li>• City of Pomona Public Works Department</li> <li>• City of Pomona Community Services Dept.</li> <li>• City of Pomona Police Department</li> <li>• Pomona Youth &amp; Family Master Plan Committee</li> <li>• Urban League Workforce Development</li> </ul>
91.100(a)(2)	Chronically Homeless	<ul style="list-style-type: none"> <li>• Pomona Continuum of Care Coalition</li> <li>• Los Angeles Homeless Service Authority</li> </ul>
91.100(a)(3)	Lead-Based Paint	<ul style="list-style-type: none"> <li>• L.A. County Department of Public Health</li> <li>• Advanced Education Services</li> </ul>
91.100(a)(4)	Government	<ul style="list-style-type: none"> <li>• L.A. County</li> <li>• City of Pomona City Council</li> </ul>
91.100(a)(5)	Planning Agencies	<ul style="list-style-type: none"> <li>• Los Angeles County Service Planning Area Committee (SPA 3)</li> <li>• San Gabriel Valley Council of Governments (SGVCOG)</li> </ul>
91.100(c)	PHA Plan	<ul style="list-style-type: none"> <li>• Pomona Housing Authority</li> </ul>

**Table 2 – Agencies, groups, organizations who participated**

### 3. How the Agencies/Groups/Organizations Were Consulted

The Consultation and Citizen Participation Process provided outreach to various organizations, agencies, service providers and residents, and included the following methods for gathering input:

- Stakeholder Focus Groups
- Public Hearings
- Consultation with Community Based Organizations

- Community Needs Survey

**4. Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
ESG Written Standards	LAHSA Continuum of Care	Goal coincide with COC goals

**Table 3 – Other local / regional / federal planning efforts**

**PR-15 CITIZEN PARTICIPATION – 24 CFR 91.105, 91.200****1. Citizen Participation Process**

The following summarizes the City's efforts for Citizen Participation and Consultation:

**Consolidated Plan and Annual Action Plan Development:** Citizens were invited to provide input into development of the Consolidated Plan and Annual Action Plan, including identification of priority needs and setting goals and objectives, through one or more of the following mechanisms: community meetings/stakeholder focus groups, community needs survey, request for funding proposals (RFPs), public comment period and public hearing process. To ensure citizen and stakeholder participation in the development of the Consolidated Plan and Annual Action Plan, outreach efforts included mailing informational postcards to over 43,500 households, informing them of community meeting dates and requesting their input via a Community Needs Survey. Surveys were delivered to over thirteen community service centers, available online at the City's website, available at the City Hall Housing counter and available at all Consolidated Plan and Annual Action Plan related community meetings. The Community Needs Survey was available online beginning October 25, 2022. The final due date for submission of both online and paper surveys was January 31, 2023. The FY 2023-2024 Community Needs Survey was distributed in English and Spanish.

**Public Hearings and/or Meetings:** Public hearings provide a major source of citizen input on proposed programs and activities. Two (2) public hearings and eight (8) community meetings were held in order to address housing and community development needs.

**Public Notification:** To ensure that all City residents had ample opportunity to take notice of all scheduled public hearings, notices were published in a local newspaper of general circulation at least ten (10) days prior to the date of public hearing.

**Evaluation/Review and Comment:** Citizens were given the opportunity to review and comment on the Draft Five Year Consolidated Plan and Annual Action Plan from March 31, 2023, through May 1, 2023, The City published a public notice in the local newspaper informing interested persons about the Consolidated Plan and Annual Action Plan review/comment period. (See Appendix D for a copy of the public notice).

**Access to Information/Availability to the Public:** As required by Federal regulations, the Consolidated Plan and Annual Action Plan was made available at the following

locations: City Hall Clerk's Office – 2nd Floor; Neighborhood Services Department – Housing Division- 1st Floor; City of Pomona Library, Resources Desk, 625 South Garey Avenue, Pomona, CA, 91766; and the City of Pomona Website.

Mode of Outreach	Target of Outreach	Summary of Attendance	Summary of Comments Received	Summary of Comments Not Accepted & Reason
Public Hearings	All Stakeholders		See Appendix J	None
Public Meetings	Residents		See Appendix J	None
Survey	All Stakeholders		See Appendix F	None
Social Media	All Stakeholders		See Appendix J	None

**Table 4 – Citizen Participation Outreach**

### Summary of Citizen Comments

Citizen comments have been taken into consideration in the development of the Consolidated Plan and Action Plan as part of the strategies and activities to meet those community needs. The comments represent those made by stakeholders through the community needs survey, a public council meeting, a public hearing and the 30-day comment period. Comments with eligible activities for the CDBG, HOME or ESG Programs and that were identified as having a high priority needs, have been incorporated into the Action Plan.

### SEE APPENDIX J: SUMMARY OF PUBLIC COMMENTS

### III. NEEDS ASSESSMENT

#### NA-05 OVERVIEW

This section of the Consolidated Plan represents an examination of the City's Housing, Homeless, Non-Homeless Special, and Non-Housing Community Development Needs. The Housing Market Analysis will provide a more detailed look at the City's Housing Needs and the services and facilities to meet those needs.

In determining the needs of the community, several characteristics of the community are key. Those include the population, household size and composition, as well as the median income of households among other things.

In 1890, just two years after being incorporated, the City of Pomona had a population of just over 3,600 persons. The City has grown steadily since, with the most rapid growth occurring in the 1950s and 1980s. In recent years, however, Pomona's population appears to have stabilized at approximately 150,000 persons. According to 2020 Census data, the City's population was recorded at 151,713 persons, which has slightly increased by 1.7% percent from the previous decade.

Household income is the key determinant of ability to pay for housing. For many households, their income is too limited to afford existing housing, particularly given the steady upward trend of housing costs that has been experienced year-over-year across Los Angeles County since mid-2020. A larger number of households have incomes too low to afford new housing. According to the 2020 Census and the 2017-2021 ACS data, higher proportions of Hispanic residents in Pomona have incomes below the poverty level compared to the Hispanic populations in the surrounding jurisdictions.

Noting the lower proportions of Hispanic residents in the overall surrounding jurisdictions, and the higher ratios of Hispanic residents living below the poverty level in Pomona, the high concentration of Hispanic residents may be attributed in part due to a displacement of this population from higher cost neighboring areas. In the City of Pomona, increasing availability of affordable housing for low-income households, in addition the current and historically present Hispanic-serving institutions may continue to attract Hispanic populations to the City.



**NA-10 HOUSING NEEDS ASSESSMENT – 24 CFR 91.205(A,B,C) SUMMARY OF HOUSING NEEDS**

Demographics	Base Year: 2010	Most Recent Year: 2020	% Change
Population	149,058	151,713	1.8%
Households	38,535	41,457	8.1%
Median Income	\$50,497	\$70,494	28.4%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2010 Census (Base Year), 2017-2021 ACS (Most Recent Year)

**Number of Households Table**

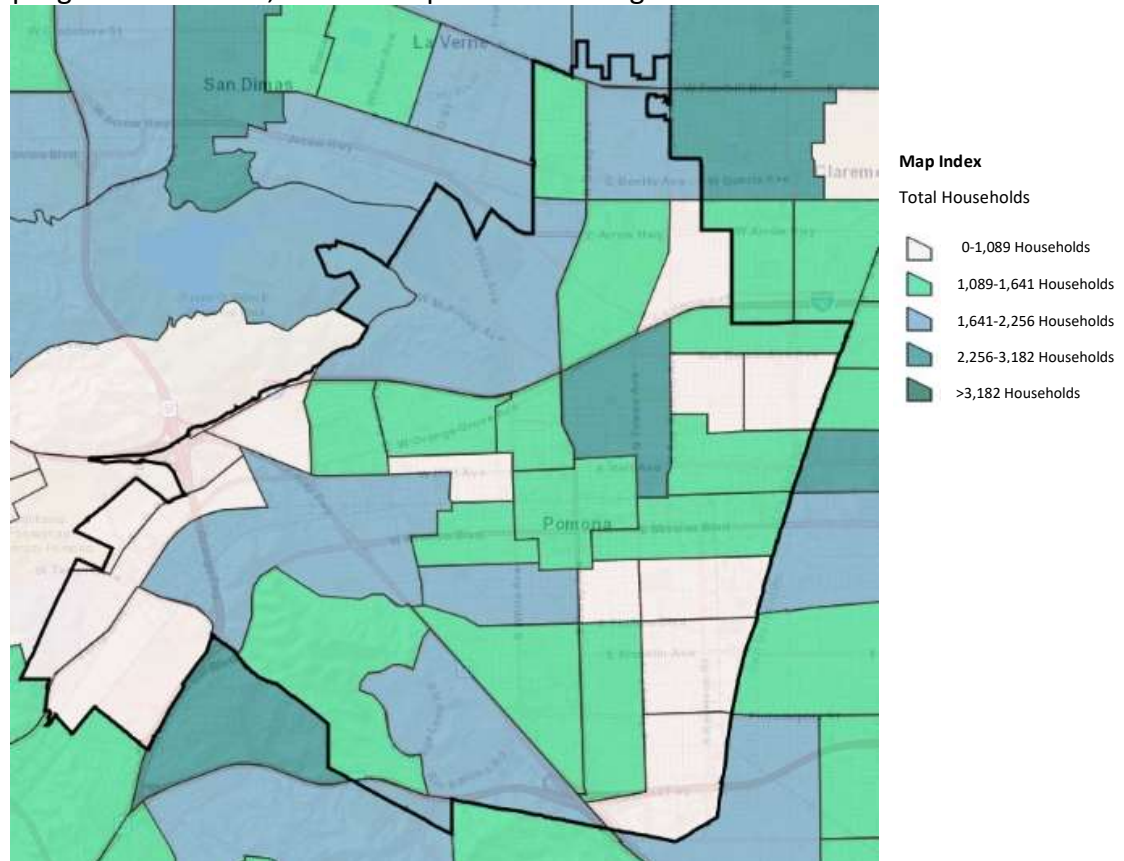
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	9,075	7,665	9,060	4,015	9,280
Small Family Households	3,390	3,415	4,145	1,900	4,250
Large Family Households	1,395	1,815	2,530	1,030	1,885
Household contains at least one person 62-74 years of age	1,820	1,610	1,915	1,040	2,435
Household contains at least one person age 75 or older	1,214	915	995	305	725
Households with one or more children 6 years old or younger	2,255	1,975	2,045	910	1,365

**Table 6 - Total Households Table**

**Data Source:** 2015-2019 CHAS

The number of households with unmet housing needs, including one (1) or more problems of overcrowding, incomplete plumbing or kitchen facilities, and cost burden can be estimated based on Comprehensive Housing Affordability Strategy (CHAS) Data. As indicated in the tables to follow, there are a large number of households with problems. Among the households are owners with problems and renters with problems both at various income levels. The number of households with problems

can be expected to increase in the next ten years. The development of this new Five-Year Consolidated Plan Strategy coincides with the drafting of a new Assessment of Fair Housing (AFH), allowing for coordination of demographic research and analysis, program evaluation, and development of strategies to address needs.



Total Households - Pomona, CA

Date Source: CPD Maps, Consolidated Plan and Continuum of Care Planning Tool

**Housing Needs Summary Tables**

## 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	185	60	85	30	360	35	20	15	0	69
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	685	400	290	65	1,440	70	50	150	40	310
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	875	715	545	135	2,270	65	385	495	260	1,250
Housing cost burden greater than 50% of income (and none of the above problems)	3,210	1,045	120	0	4,375	1,305	895	355	0	22,555

Housing cost burden greater than 30% of income (and none of the above problems)	855	1,640	1,345	60	3,900	335	840	1,535	475	3,185
	<b>Renter</b>					<b>Owner</b>				
	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>
Zero/negative Income (and none of the above problems)	410	0	0	0	410	155	0	0	0	155

Table 7 – Housing Problems Table

Data Source: 2015-2019 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	<b>Renter</b>					<b>Owner</b>				
	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>	<b>0-30% AMI</b>	<b>&gt;30-50% AMI</b>	<b>&gt;50-80% AMI</b>	<b>&gt;80-100% AMI</b>	<b>Total</b>
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	4,950	2,215	1,040	230	8,435	1,480	1,350	1,015	300	4,145
Having none of four housing problems or cost burden not computed, none of the other three severe housing problems	1,670	2,240	2,965	1,165	8,040	975	1,860	4,045	2,320	9,200

Table 8 – Housing Problems 2

Data Source: 2015-2019 CHAS

## 3. Cost Burden &gt; 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,610	1,625	625	4,855	530	1,010	1,095	2,635
Large Related	1,025	785	230	2,040	245	425	410	1,080
	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	1,005	340	80	1,425	795	430	350	1,575
Other	1,315	580	390	2,285	195	160	170	525
Total need by income	5,640	3,440	1,525	10,605	1,765	2,025	2,025	5,815

Table 9 – Cost Burden &gt; 30%

Data Source: 2015-2019 CHAS

## 4. Cost Burden &gt; 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,045	440	35	2,520	440	495	160	1,095
Large Related	685	130	0	815	165	220	30	415
Elderly	710	125	0	835	605	225	140	970
Other	810	390	85	1,285	170	70	30	270
Total need by income	4,250	1,085	120	5,455	1,380	1,010	360	2,750

Table 10 – Cost Burden &gt; 50%

Data Source: 2015-2019 CHAS

## 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	1,405	870	505	130	2,910	85	330	360	200	975
Multiple, unrelated family households	185	205	310	70	770	50	100	270	100	520
Other, non-family households	19	55	20	0	94	0	0	24	0	25
Total need by income	1,609	1,130	835	200	3,774	135	430	655	300	1,520

**Table 11 – Crowding Information – 1/2**

Data Source: 2015 - 2019 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	1,830	1,385	1,130	4,345	425	590	915	1,930

**Table 12 – Crowding Information – 2/2**

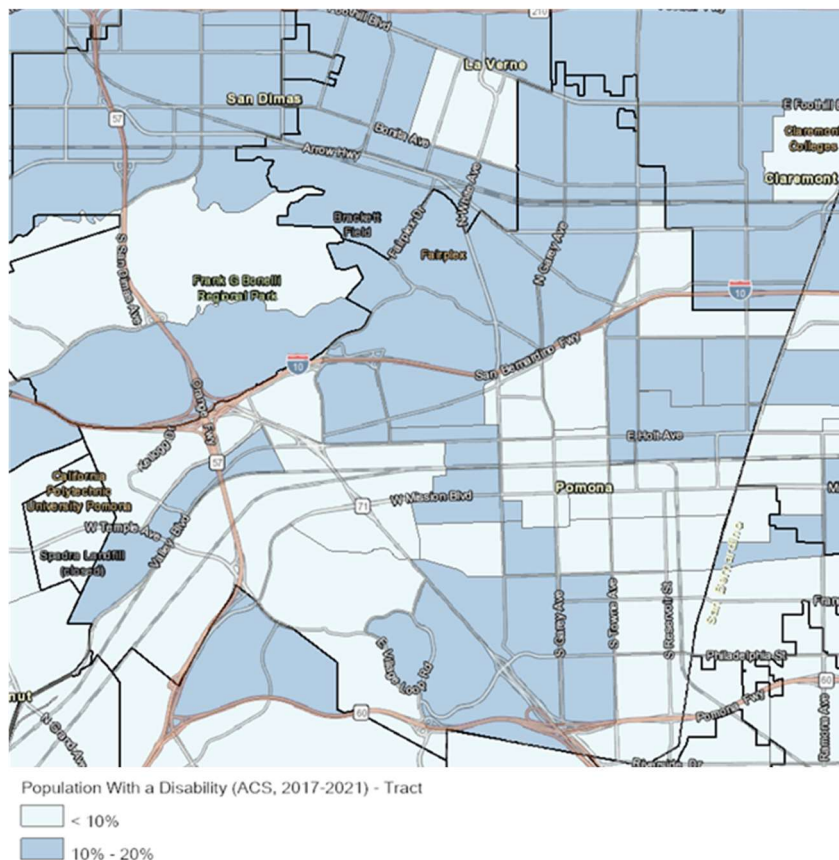
Data Source: 2015 - 2019 CHAS

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

Roughly 15,543 people in Pomona, or 11.12% percent of City residents five years of age or older, had some sort of disability as of 2021. This is similar to the County 10.68% and State 11.28% disability rates. Under the Institute of Medicine (IOM) and the International Classification of Functioning, Disability, and Health (ICF), disability is defined as the product of interactions among individuals' bodies; their physical, emotional, and mental health; and the physical and social environment in which they live, work, or play. The U.S. Census Bureau, American Community Survey (ACS) attempts to capture six aspects of disability: hearing, vision, cognitive, ambulatory, self-care, and independent living. A more detailed description of each disability is provided below:

- Hearing disability: Refers to deafness or serious difficulty hearing.
- Vision disability: Refers to blindness or serious difficulty seeing even when wearing glasses.
- Cognitive disability: Refers to serious difficulty concentrating, remembering, or making decisions.
- Ambulatory disability: Refers to serious difficulty walking or climbing stairs.
- Self-care disability: Refers to a condition that restricts ability to dress or bathe.
- Independent living difficulty: Refers to a condition that restricts ability doing errands alone such as visiting a doctor's office or shopping

Table 13 shows the types of disability in Pomona by age group. Among the 17,158 elderly residents in the City, 38.93% had one or more disabilities. Members of this group are particularly vulnerable not only because of their frail condition but also because of their often fixed and limited incomes.



Source: California Department of Housing and Community Development – AFFH Data Viewer

<b>People with Disabilities in Pomona, Civilian Non-Institutionalized Population</b>		
<b>Disability Type</b>	<b>People with Disabilities</b>	<b>Percent of Disabled Population<sup>1</sup></b>
<i>People under age 18 :</i>	<i>1,347</i>	<i>3.6%</i>
Hearing Difficulty		.5%
Vision Difficulty		1.1%
Cognitive Difficulty		3.2%
Ambulatory Difficulty		.9%
Self-care Difficulty		1.3%
Independent Living Difficulty		0.0%
<i>People aged 18 to 64 years:</i>	<i>7,657</i>	<i>8%</i>
Hearing Difficulty		1.8%
Vision Difficulty		2%
Cognitive Difficulty		3.6%
Ambulatory Difficulty		3.4%
Self-care Difficulty		1.4%
Independent Living Difficulty		2.9%
<i>People aged 65 years and over:</i>	<i>6,680</i>	<i>38.93%</i>
Hearing Difficulty		11.8%
Vision Difficulty		8.3%
Cognitive Difficulty		11.3%
Ambulatory Difficulty		38.7%
Self-care Difficulty		10.9%
Independent Living Difficulty		20.7%

**Table 13 – People with Disabilities**<sup>1</sup>This number may count persons having one or more disabilities.**Source:** American Community Survey, 5 Year Estimates, 2017-2021

Housing needs for persons with disabilities varies depending on the type of disability. However, persons with disabilities often need accessibility and barrier free design, as well affordability and proximity and accessibility to transportation and services. Other persons with disabilities may require a group living environment where supervision and supportive services are provided or may require an institutional setting where medical attention is provided.

#### Developmentally Disabled

Changes in State law (SB 812), approved by the CA Legislature in 2010 amended State Housing Element Law to require the Housing Element to analyze the housing needs of persons with developmental disabilities and to identify resources to serve this



population. As defined in Section 4512 of the Welfare and Institutions Code a "Developmental disability" is defined as a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual which includes mental retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation but shall not include other handicapping conditions that are solely physical in nature.

Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult. In addition, developmentally disabled individuals are in need of housing adapted to their needs, proximity to services and transportation as well as various types of housing such as group living opportunities and supportive services. Special consideration should also be given to the affordability of housing, as people with developmental disabilities may be living on a fixed income.

The State Department of Developmental Services (DDS) currently provides community-based services to approximately 271,000 persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. The San Gabriel / Pomona Regional Center is one of 21 regional centers in the State of California that provides point of entry to services for people with developmental disabilities. The center is a private, non-profit community agency that contracts with local businesses to offer a wide range of services to individuals with developmental disabilities and their families.

In January 2010 the Department of Developmental Services (DDS), announced its intention to close the Lanterman Developmental Center in Pomona. The Lanterman Developmental Center once provided 24-hour residential care for individuals with developmental disabilities. At one time the Center served more than 3,000 residents. DDS was required to complete closure of Lanterman by the end of 2014 and has since turned over jurisdiction of the property to Cal Poly Pomona University by the California Department of Finance via a Memorandum of Understanding and is now under development for other uses.

The table below provides information from the State of California Department of Development Services San Gabriel / Pomona Regional Center, charged by the State of California with the care of people with developmental disabilities.

<b>Developmental Disability Services Provided, by Age, for City of Pomona</b>			
Zip Code	0-17 Years	18+ Years	Total
91766	521	429	950
91767	352	464	816
91768	251	223	474
Total	1,124	1,116	2,240

**Table 14 – Developmental Disability Services Provided, by Age**

**Source:** DDS, Quarterly Consumer Report by Age Group and Residence Type, End of Year 2021

### **Common Housing Problems**

The most common housing problems continue to be overcrowding and housing cost burden. Based on ACS data, renter households are slightly more affected by overcrowding, while owners are more affected by housing cost burden.

For homeless persons or those at risk of homelessness, the most significant problem is the lack of affordable housing. This problem is compounded by the lack of available resources available to assist with effectively meeting the housing needs of lower-income or no income households.

Although efforts across the State have been increasingly put forth by local agencies to reduce housing problems for chronically homeless persons, there is still an insufficient inventory of emergency shelter, transitional housing and permanent supportive housing designated to meet the specific needs of these populations who often struggle with physical and mental health problems in addition to substance abuse issues. Many chronically homeless persons have multiple co-occurring disorders which makes housing stability more difficult to maintain once achieved.

### **Populations/Households More Affected By These Problems**

#### *Large Families*

Large families are more affected by overcrowding. A larger family can face problems in acquiring housing due to their lower per capita income than smaller families. Also, the scarcity of larger housing units leads to overcrowding which appears more prevalent in renter households. For example, Asian or Hispanic cultures often choose

to live multi-generationally, requiring larger housing units. If these considerations are unaccounted for, inappropriate housing stock and availability within a city may occur leading to overcrowding.

### Seniors

The primary concerns of the elderly are income, housing and transportation. Many seniors live on a fixed income, tied to retirement payments and high healthcare costs. Due in part to their age, seniors are more susceptible to mobility issues and self-care limitations which suggests a need for accessible shops and services, open space, as social activities. Specific housing needs of the senior population includes affordable housing, supportive housing (such as intermediate care facilities, group homes, and other housing needs that includes a planned service component. As of 2021, 11.8 percent of Pomona residents were seniors (over 65 years of age), and 38.9% of these seniors had one or more disabilities. About 21.6% of all households are headed by a senior, and 37.6% of those households consist of one person.

### Single-Headed Households

Single-parent families made up 27.6% of all households in Pomona, with more than half of those consisting of a mother with children. These families may need housing assistance at a higher rate than other families due to a lower per capita income and the possibility that a parent can work only part time in order to care for the children. In addition, women tend to hold lower paying jobs than do men. Single-parent families may be in particular need of childcare. Living near clustered mixed-use centers providing neighborhood retail, service commercial, childcare, open space, supportive service and transit opportunities—can allow single parents to work and take care of errands in close proximity to home and childcare.

### **Characteristics and Needs of Low-Income Individuals and Families w/ Children who are currently housed but at Risk of Becoming Homeless:**

Families and individuals in need of homeless prevention assistance must be at or below 30% of area median income. Comparing the HUD 2022 Income limits, and data from percentages of households with specific income ranges, analytics show that over 23% of the households in Pomona may be Extremely Low-Income households. A few of the needs of such households include affordable housing, larger housing units and ample income or jobs.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

XXXXX

**Needs of Formerly Homeless Families and Individuals who are receiving or received Rapid Re-Housing assistance and are nearing termination of that assistance:**

Most former homeless families or individuals that received homeless assistance are now in need of higher paying jobs or affordable housing.

**Housing Characteristics Linked with Instability and Increased Risk of Homelessness**

Households with instability and increased risk of homelessness will meet one of the following housing characteristics in addition to the at-risk of homeless criteria.

- Have moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; or
- Are living in the home of another because of economic hardship; or
- Have been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; or
- Live in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; or
- Live in an SRO or efficiency apartment unit in which there reside more than two persons or live in a larger housing unit in which there reside more than one and a half persons per room; or
- Are exiting a publicly funded institution or system of care

**NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205(B)(2)****Introduction**

Disproportionate needs for decent housing occur when members of a racial or ethnic group are disproportionately affected by a housing problem. HUD defines the disproportionate prevalence of a housing need as “.... When the percentage of persons in a category of need (such as those experiencing a housing problem) who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole. As such, disproportionate needs can be seen for any income categories in which a racial or ethnic group has disproportionately greater share of housing problems. Disproportionate share thresholds varied for each income category, and disproportionate needs were seen more among households in the 0-30% Area Median Income.

**0%-30% of Area Median Income**

<b>Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	1,865	775
White	190	295
Black / African American	5,805	1,010
Asian	200	110
American Indian, Alaska Native	35	1,550
Pacific Islander	4,075	890
Hispanic	514	600

**Table 15 - Disproportionally Greater Need 0 - 30% AMI****Data Source:** 20015-2019 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%

### 30% - 50% Cost of Area Median Income

Housing Problems*	Has one or more of the four housing problems	Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems
Jurisdiction as a whole	2,520	1,245
White	2,870	470
Black / African American	5,305	1,195
Asian	0	4
American Indian, Alaska Native	385	190
Pacific Islander	370	25
Hispanic	560	100

**Table 16 - Disproportionally Greater Need 30 - 50% AMI**

**Data Source:** 2015-2019 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

<b>Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	2,830	2,790
White	1,710	1,110
Black / African American	4,200	3,465
Asian	0	0
American Indian, Alaska Native	435	360
Pacific Islander	170	145
Hispanic	480	355

**Table 17 - Disproportionally Greater Need 50 - 80% AMI****Data Source:** 2015-2019 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

<b>Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	900	2,140
White	225	730
Black / African American	730	2,345
Asian	0	0
American Indian, Alaska Native	205	305
Pacific Islander	0	60
Hispanic	40	285

**Table 18 - Disproportionally Greater Need 80 - 100% AMI****Data Source:** 2015-2019 CHAS

\*The four housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than one person per room 4. Cost Burden greater than 30%



**NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205(B)(2)****Introduction**

As it relates to severe housing problems, it appears that the Hispanic ethnic group continues to have a greater number of one or more of the four housing problems. Disproportionate needs were seen among households in the 0- 30% Area Median Income.

**0%-30% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	6,430	2,645
White	985	4295
Black / African American	455	235
Asian	750	475
American Indian, Alaska Native	4	45
Pacific Islander	0	0
Hispanic	4,095	1300

**Table 19 – Severe Housing Problems 0 - 30% AMI**

**Data Source:** 2015-2019 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	3,565	4,100
White	385	640
Black / African American	120	235
Asian	440	330
American Indian, Alaska Native	0	35
Pacific Islander	0	4
Hispanic	2,445	2,835

**Table 20 – Severe Housing Problems 30 - 50% AMI****Data Source:** 2015-2019 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	2,055	7,010
White	155	905
Black / African American	150	455
Asian	120	720
American Indian, Alaska Native	0	0
Pacific Islander	0	10
Hispanic	1,630	4,860

**Table 21 – Severe Housing Problems 50 - 80% AMI****Data Source:** 2015-2019 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems OR cost burden not computed, none of the other 3 severe housing problems</b>
Jurisdiction as a whole	530	3,585
White	10	575
Black / African American	0	320
Asian	45	360
American Indian, Alaska Native	0	15
Pacific Islander	0	0
Hispanic	475	2,160

**Table 22 – Severe Housing Problems 80 - 100% AMI**

**Data Source:** 2015-2019 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities 2. Lacks complete plumbing facilities 3. More than 1.5 persons per room 4. Cost Burden over 50%

**Discussion**

Based on the available data, it is evident that minority groups in Pomona, experience higher rates of housing cost burden, overcrowding, and/or substandard housing conditions when compared to non-minority groups.

**Housing Problems**

Tables 15-22 demonstrates the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing “one of four housing problems”:

- housing cost burden (defined as paying more than 30 percent of income for monthly housing costs including utilities);

- overcrowding (HUD defines overcrowding as more than one person per room – which includes all habitable rooms in the unit, i.e. bedroom, living room, dining room, but excludes bathroom and kitchen, etc.);
- lacking a complete kitchen; or
- lacking plumbing.

The second category is households experiencing “one of four *severe* housing problems” which are:

- severe housing cost burden (defined as paying more than half (50 percent) of one’s income for monthly housing costs including utilities);
- severe overcrowding (HUD defines severe overcrowding as more than 1.5 persons per room – which includes habitable rooms in the unit, i.e. bedroom, living room, dining room, but excludes bathroom and kitchen, etc.); and
- lacking a complete kitchen; or
- lacking plumbing.

In the City, large family households (5 or more persons) are more likely to experience any of the four above mentioned housing problems. White (11 percent) and Hispanic (60 percent) households are the racial groups most likely to experience housing problems in Pomona.

In Pomona, the most prevalent housing problem is housing cost burden, with slightly over a quarter (37 percent) of all City households and 39 percent of extremely low-income households overpaying for housing.

The input collected through community participation efforts expressed a need for affordable housing that supports a variety of household types, including low-income families, single-parents, working poor, veterans, and persons with disabilities.

**NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDEN – 91.205(B)(2)****Introduction**

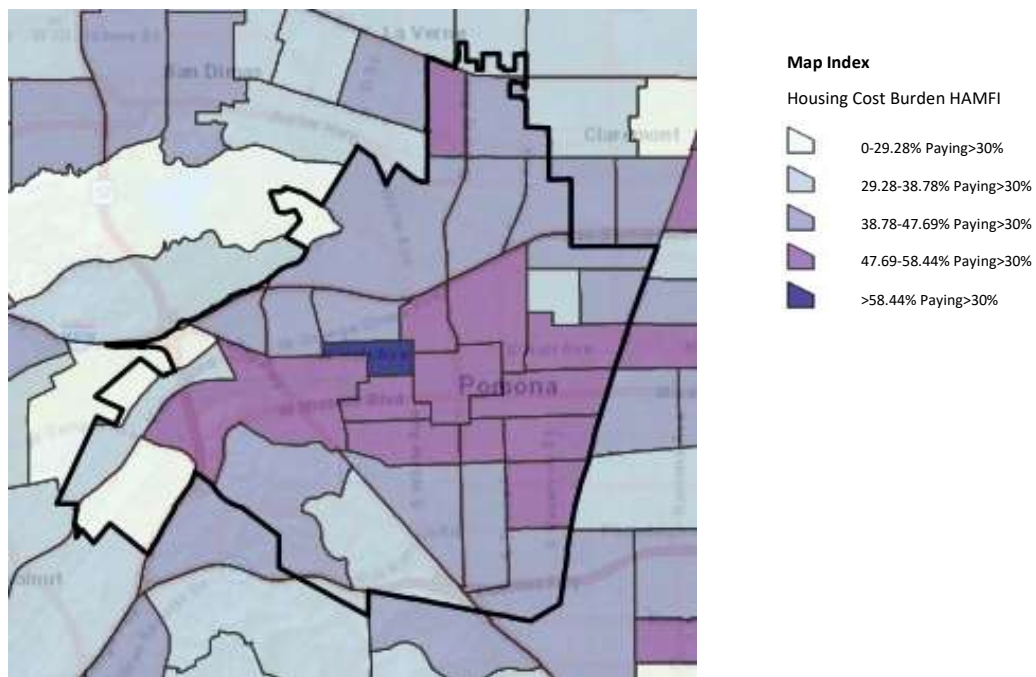
Cost burden provides an indicator of the ability to sustain a household budget in consideration of other factors beyond housing costs (i.e., utilities, food, maintenance, etc.). Whenever households pay an excessive amount of their income on costs directly related to housing, it decreases the amount of income available for other needs. This indicator is an important measurement of local housing market conditions as it reflects the affordability of housing in the community. A household experiences a cost burden if between 30 and 50 percent of a household income is used for housing costs, and a household experiences a severe cost burden if 50.1 percent or more of household income is devoted to housing costs. For renters, this represents monthly rent and any energy costs incurred. For homeowners, this includes all energy costs, water and sewer charges, refuse collection, taxes, insurance, and principal and interest on a mortgage.

Severely cost burdened renters and homeowners with a mortgage are at risk of homelessness because a financial setback could result in the inability to cover housing costs.

As it relates to housing cost burden, it appears that the Hispanic ethnic group has more disproportionate needs which were seen among households in the 0-30% Area Median Income.

**Housing Cost Burden**

<b>Housing Cost Burden</b>	<b>&lt;=30%</b>	<b>30-50%</b>	<b>&gt;50%</b>	<b>No / negative income (not computed)</b>
Jurisdiction as a whole	20,980	9,215	8,284	620
White	3,955	1,295	1,305	115
Black / African American	1,375	535	685	45
Asian	2,320	935	1,210	165
American Indian, Alaska Native	80	70	4	0
Pacific Islander	15	10	0	0
Hispanic	12,965	6,250	4,885	245

**Table 23 – Greater Need: Housing Cost Burdens AMI****Data Source:** 2015-2019 CHAS

Housing Cost Burden HAMFI (Pomona, CA)

**Data Source:** CPS Maps, Consolidated Plan and Continuum of Care Planning Tool

**NA-30 DISPROPORTIONATELY GREATER NEED: DISCUSSION – 91.205(B)(2) INTRODUCTION**

Disproportionate needs were seen more among Hispanic households in the 0-30% and 50-80% Area Median Income bracket. Race and ethnicity diversity was apparent amongst all income groups with all income groups having high incidents of one to four housing problems.

Cost burden is an important housing issue because paying a high proportion of one's income for housing leaves less money available for other basic necessities, such as food and health care. Housing cost burden is typically linked to household income. Generally, the proportion of a household's income dedicated to housing costs increases as overall income decreases. State and federal standards specify that a household experiences a housing cost burden if it pays 30 percent or more of its gross income on housing. A severe housing cost burden is when a household pays 50 percent or more of its gross income on housing.

Housing overpayment is typically less likely among owners than renters, as renters do not have the option of mortgaging or selling property to generate cash. Extremely low- and very low-income renters are disproportionately impacted by overpayment.

Thirty seven percent of all Pomona households were overpaying for housing while the majority of extremely low-, very low- and low-income households were overpaying. Almost one-third of extremely low- income Pomona households spent over half of their income on housing and seventeen percent of households with moderate or above moderate incomes overpaid for housing.

Overpayment was more frequent among Pomona extremely low and very low-income renters than homeowners in the same income categories and more frequent among low- and moderate-income homeowners.



Summary of Housing Overpayment (Cost Burden)								
Home by Cost Burden <sup>1</sup>	Homeowners				Renters			
	Cost Burden > 30%	Percent <sup>2</sup>	Cost Burden > 50%	Percent <sup>2</sup>	Cost Burden > 30%	Percent <sup>2</sup>	Cost Burden > 50%	Percent <sup>2</sup>
Household Income less than or = 30%	1,695	4.4%	1,130	3.4%	5,105	13.1%	4,300	11.1%
Household Income >30% to less-than or =50% MFI <sup>3</sup>	1,925	5%	1,160	3%	3,335	8.6%	1,275	3.3%
Household Income >50% to less-than or =80% MFI <sup>3</sup>	2,285	5.9%	650	1.7%	1,945	5%	235	0.6%
Household Income >80% to less-than or =100% MFI <sup>3</sup>	755	1.9%	55	0.1%	310	0.8%	20	0.1%
Household Income >100% MFI <sup>3</sup>	689	1.8%	4	0%	90	0.2%	0	0%

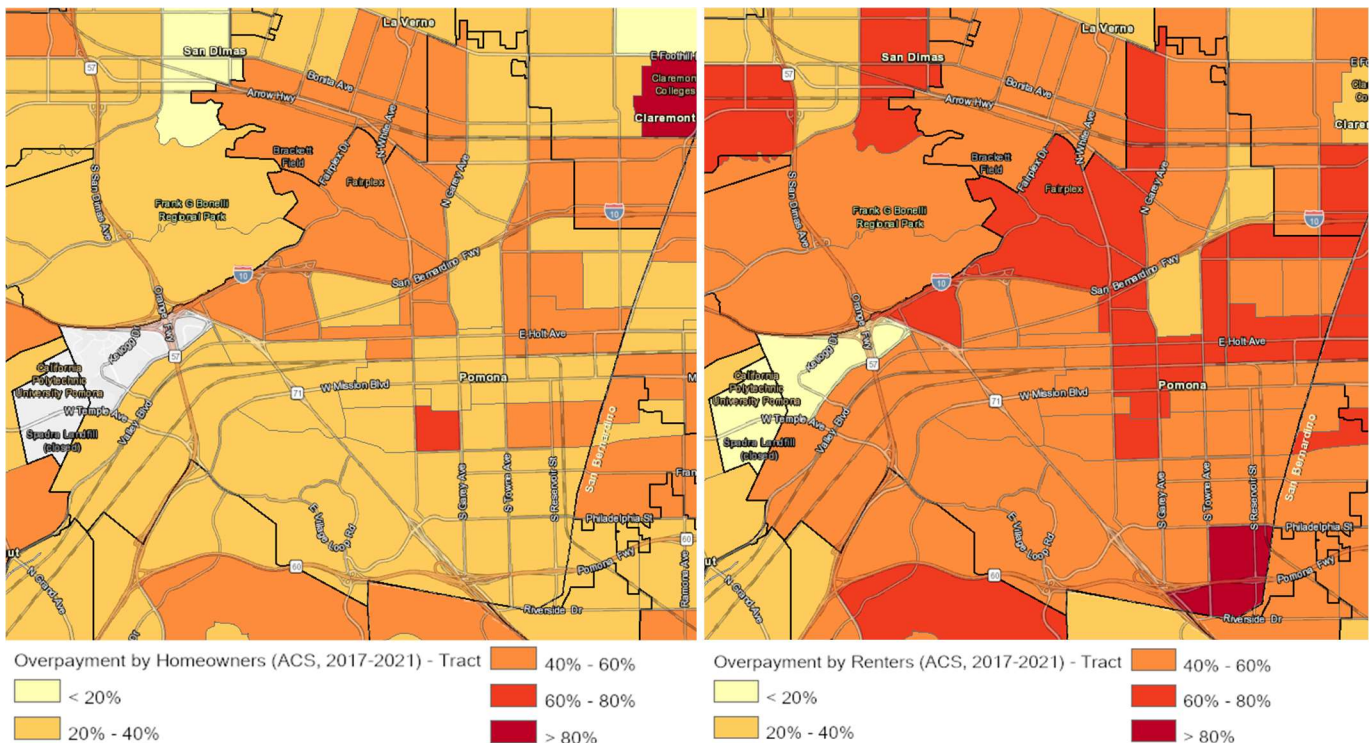
1. Cost burden is the ration of housing costs to household income. For enter, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owners costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

2. Percent of total households in Pomona.

3. MFI refers to the HUD Area Median Family Income – this is the median family income calculated by HUD for each jurisdiction to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number), due to a series of adjustments tata are made.

Source: Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Table 24 – Summary of Housing Overpayment (Cost Burden)



Source: California Department of Housing and Community Development – AFFH Data Viewer

**R/ECAPs in Pomona**

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metropolitan area.

According to the HUD AFFH Mapping tool, in 2020, three areas within the City of Pomona with a high poverty concentration are classified as R/ECAPs. These areas are scattered across the City. One R/ECAP is located further east and is bordered by San Antonio Avenue, East 1<sup>st</sup> street, and the City's eastern boundary. Another R/ECAP is located in the City's west side, bordered by the City's western boundary/California State Route 57, Temple Avenue, and Pomona/Valley Blvd. However, the R/ECAP located in the City's west side is primarily farmland with little residential population.

**R/ECAP Trends**

The number and locations of the identified R/ECAPs in Pomona have changed over time (since 1990). In 1990 the City had no identified R/ECAPs by 2000 this increased to a single, moderately sized R/ECAP located in central Pomona. In 2010, the City had three R/ECAP areas distributed across the City. By 2020, the City had two R/ECAP areas, both bordering the City's western and eastern boundaries.

With regards to race, Hispanic residents have consistently resided in the City's R/ECAPs. In 2020, of the City's foreign-born population, Mexican-born residents were the predominant group in the City's R/ECAPs. Accordingly, a majority of households in R/ECAPs with Limited English Proficiency identified to primarily speak Spanish.

		City of Pomona		Region (Los Angeles-Long Beach-Anaheim CBSA)	
R/ECAP Race/Ethnicity		Total	%	Total	%
Total Population in R/ECAPs		6,704	-	546,276	-
White, Non-Hispanic		574	8.56%	40,709	7.45%
Black, Non-Hispanic		390	5.82%	74,659	13.67%
Hispanic		5,500	82.04%	381,529	69.84%
Asian or Pacific Islander, Non-Hispanic		163	2.43%	40,491	7.41%
Native American, Non-Hispanic		14	0.21%	963	0.18%
Other, Non-Hispanic		4	0.06%	1,471	0.27%
R/ECAP Family Type		Total	%	Total	%
Total Families in R/ECAPs		1,274	-	99,701	-
Families with children		880	69.07%	61,596	61.78%
R/ECAP National Origin	Country	Total	%	Total	%
Total Population in R/ECAPs		6,704	-	546,276	-
#1 country of origin	Mexico	1,838	27.42%	128,177	23.46%
#2 country of origin	El Salvador	129	1.92%	36,199	6.63%
#3 country of origin	Western Africa	69	1.03%	27,449	5.02%
#4 country of origin	Philippines	42	0.63%	7,789	1.43%
#5 country of origin	China excl. Taiwan	27	0.40%	6,385	1.17%
#6 country of origin	Other Central America	24	0.36%	3,470	0.64%
#7 country of origin	Other South Central Asia	18	0.27%	2,586	0.47%
#8 country of origin	Israel	13	0.19%	2,237	0.41%
#9 country of origin	Other Eastern Europe	13	0.19%	1,799	0.33%
#10 country of origin	Other South America	13	0.19%	1,702	0.31%
<b>Notes:</b>					
1. 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.					
2. Data Sources: Decennial Census; 2017-2021 ACS					

Table 25 - R/ECAP Demographics

**NA-35 PUBLIC HOUSING – 91.205(B)(2)****Introduction**

The City of Pomona does not have any Public Housing. However, the Pomona Housing Authority does provide assisted affordable housing via the following program:

- Housing Choice Voucher Program (Formerly Known as Section 8)

**Totals in Use**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
# of units vouchers in use	0	0	0	XXX	0	XXX	XX	0	0

**Table 26 – Public Housing by Program Type**

**\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Data Source:** PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	0	XXX	0	XXX	XXX		0
Average length of stay	0	0	0	X	0	X	X		0
Average Household size	0	0	0	X	0	X	X		0
# Homeless at admission	0	0	0	0	0	0	0		0
# of Elderly Program Participants (>62)	0	0	0	XXX	0	XXX	0		0
# of Disabled Families	0	0	0	XXX	0	XXX	0		0
# of Families requesting accessibility features	0	0	0	XXX	0	XXX	X		0
# of HIV/AIDS program participants	0	0	0	0	0	0	0		0
# of DV victims	0	0	0	0	0	0	0		0

**Table 27 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
White	0	0	0	XXX	0	XXX	0	0	0
Black/African American	0	0	0	XXX	0	XXX	X	0	0
Asian	0	0	0	XX	0	XX	0	0	0
American Indian/Alaska Native	0	0	0	X	0	X	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

Table 28 – Race of Public Housing Residents by Program Type

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled*
Hispanic	0	0	0	XXX	0	XXX	0	0	0
Not Hispanic	0	0	0	XXX	0	XXX	X	0	0

Table 29 – Ethnicity of Public Housing Residents by Program Type

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment****Needs of Public Housing Tenants and Applicants on the Waiting List for Accessible Units**

Requests for accommodation for persons with disabilities range from the following:

1. Permitting applications and reexaminations to be completed by mail
2. Conducting home visits
3. Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the PHA range) if the PHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit
4. Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit
5. Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff
6. Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair
7. Requests for information regarding available housing for seniors, not specifically for modified units.

**Most Immediate Needs of Residents of Public Housing and Housing Choice Voucher Holders**

Ninety-nine percent of the requests from housing choice voucher holders fall within these three categories:

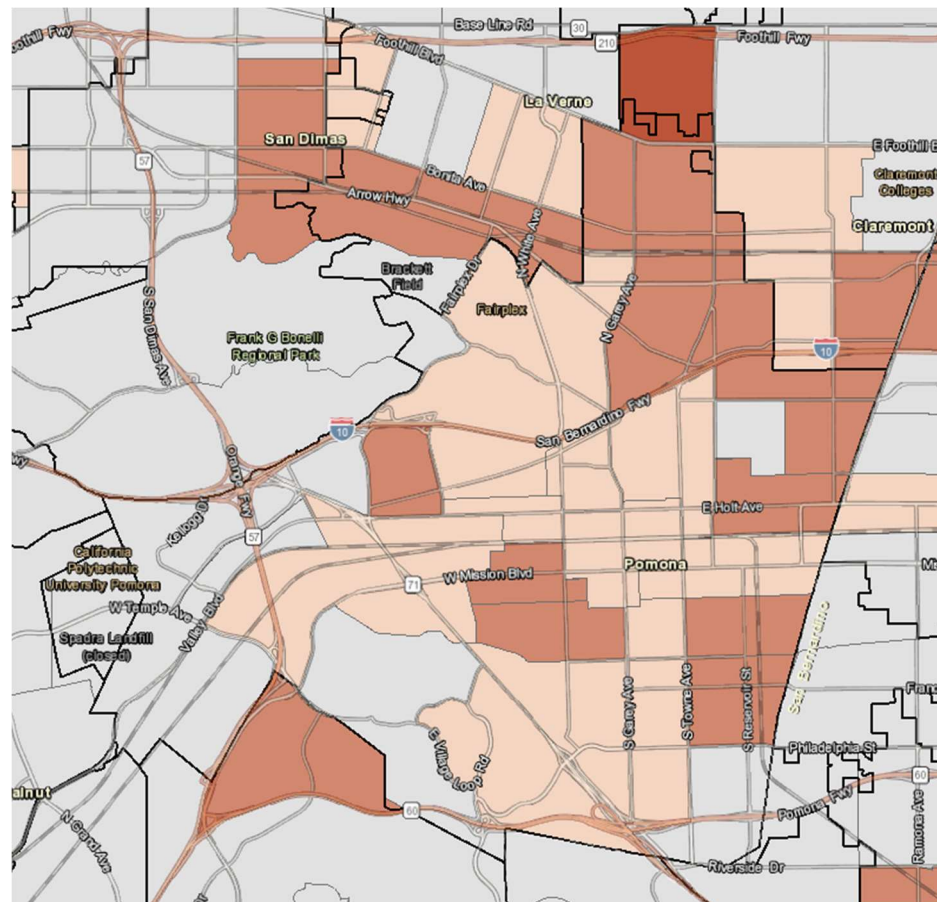
1. Conducting home visits
2. Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit
3. Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff

**How do these needs compare to the housing needs of the population at large**

The needs of the housing choice voucher holders are similar and non-similar to the housing needs of the population as a whole. Both populations need housing units for

large households. Also, as evidenced by the lower-income bracket of the majority of Pomona residents, both populations also need affordable housing.

In contrast, housing choice voucher holders may need more accommodations for housing than the population at large, such as: housing inspections, assistance locating housing, assistance when dealing with landlords of housing and more administrative support due to the technical requirements of the Section 8 Housing Choice Voucher Program.



Housing Choice Vouchers (HUD, 2021) - Tract



Source: California Department of Housing and Community Development – AFFH Data Viewer



**NA-40 HOMELESS NEEDS ASSESSMENT – 91.205(c)****1. Introduction**

This section discusses the characteristics and needs of the homeless population, as well as the services, programs, and facilities available to homeless persons.

HUD defines the term “homeless” according to the Stewart B. McKinney Act, 42 U.S.C 11301, et seq. (1994), which states that a person is considered homeless if the person lacks a fixed, regular, and adequate nighttime residence, or a person who has primary nighttime residence, or a person who has a primary nighttime residence that is:

1. A supervised publicly or privately operated shelter designed to provide temporary living accommodations
2. An institution that provides a temporary residence for individuals intended to be institutionalized, or
3. A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings

**Subpopulations**

HUD defines several homeless subpopulations. This does not include the entire universe of reasons for homelessness but does include many of the reasons most often cited as contributing factors to persons becoming homeless. In addition to these definitions, a person could become homeless through earthquake, fire, or other natural disaster.

The mentally ill – Severely mentally ill persons with serious and persistent mental or emotional impairment that significantly limits their ability to live independently. In general, one percent of the general population meets a definition of severe mental illness on the basis of diagnosis and disability. According to the LAHSA Homeless Report, 21% of those homeless in the region have an Access III diagnoses.

Those with alcohol and substance abuse problems – Persons with serious and persistent alcohol or substance abuse that significantly limits a person’s ability to live independently. Former substance abusers may be able to cope well in permanent affordable housing if they have the proper support needed to maintain sobriety. However, if unable to cope with their addiction, many are at risk of losing their



housing again. According to the LAHSA Homeless Report, 21% of those homeless in the region have a substance abuse diagnosis.

Dually diagnosed persons suffer from both severe mental illness and substance abuse problems. Dual diagnosis refers to chronically mentally ill substance abusers. This group requires highly specialized ongoing services.

Those fleeing domestic violence – Within the San Gabriel Valley, 41% of homeless persons are reported to be victims of domestic violence. According to the House of Ruth, 57 battered women and their 133 children were provided shelter in the City of Pomona in 2020-2021.

Children and youth – Homeless unaccompanied youth under the age of 18 constitute 0% of the regional homeless population. Another 8% are children within families.

People with HIV/AIDS – According to the LAHSA count, 2% of the homeless population in the region are persons with HIV/AIDS.

People at-risk of homelessness – When families with limited resources experience a drop in income or an increase in rent, they can find themselves facing an eviction or termination of basic utilities. Often families at-risk do not have the skills necessary to manage their limited resources. Most at-risk are those on fixed income or the marginally employed who have few ties to family and friends. Others in this category include people facing catastrophic illness, emancipated foster youth and the recently de-institutionalized. In general, these populations are more at-risk for homelessness in Pomona due to the high cost of housing relative to incomes and low vacancy rates in the City.

### **City of Pomona Homeless Demographics**

According to the Los Angeles Homeless Service Authority, Homeless Point-in-Time Count, in 2018 there were an estimate 775 unhoused persons in Pomona, in 2019 this decreased to an estimated 696 persons and an estimated 722 persons in 2020. Due to the COVID-19 pandemic, 2021 counts were not initiated for Los Angeles County. The 2022 Point-in-Time Survey indicated an estimated 716 persons were experiencing homelessness in the City, which is a less than 1 percent decrease since 2020 (722 persons). In 2022, a total of 457 persons were unsheltered (64 percent) and another 259 persons were sheltered (36 percent). When contextualized with the total number of people residing in Pomona, the 716 homeless individuals represent approximately 0.47% of the population.

**2. Number and Type of Families in Need of Housing Assistance (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Families with Children

Families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex, confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether. According to the 2020 Census, 77 percent (30,959 households) of nearly 40,142 households in Pomona were family households. The proportion of family households who were families with children was 64 percent in 2000. This percentage saw a slight decrease to 54 percent by 2010, but by 2020 had decreased to 46 percent.

The 2020 Census also documented 11,453 single-parent family households in Pomona, representing 29 percent of all households. Single-mother households, in particular, tend to have lower incomes, and as a result, have greater needs for affordable housing and childcare. In 2020, there were 7,684 female-headed households with children in Pomona. Of particular concern are single-parent households with lower incomes. Data from the 2017-2021 ACS shows that approximately 23 percent of the City's single-parent, female-headed households had incomes below the poverty level.

Veterans and their families

The 2022 Homeless Count identified 258 homeless veterans in the region. The City has an aging population of homeless veterans from the Vietnam era and before. Additionally, veterans of the recent and current wars in the Middle East, some of whom face significant barriers to successfully reintegrating into the community, are adding to the homeless veteran population. Several of those on the street have been very challenging to assist. Some do not recognize mental health barriers that they face. Others believe they are waiting for additional financial help, real or imaginary, that they anticipate will come from family or the government and are unwilling to work with what they currently have available. The distance of available resources compounds the challenge. Transitional housing facilities for veterans are located in Los Angeles, Long Beach, Pasadena, and Moreno Valley. On April 16, 2016, The City adopted ordinance 2016-4224 which amended its Zoning Code to allow

Transitional/Supportive Housing to be considered a residential use of property, subject only to restrictions that apply to other residences of the same type (single-family or multi-family) in the same zone. The Veterans Park Apartments provides supportive housing to veterans and their families. Bringing additional veterans services, healthcare and housing to this community helps address the challenges faced by those who have given so much to our country.

#### Unaccompanied Youth

The 2022 Homeless Count identified 1 unsheltered, unaccompanied homeless youth on the streets in the City of Pomona. Unaccompanied youths under the age of 18 constitute 4% of the regional homeless population. Another 15% are families with children.

The California Hispanic Commission provides Transitional Housing for TAY youth within the City. A number of young men that have aged out of foster care are successfully managing housing, rent, and mainstream integration in the Metropolitan Apartments in the City. Homeless unaccompanied youth are a particularly vulnerable population. If early intervention takes place, children and young adults in this age range have a greater possibility of moving successfully into adulthood. Housing, education, job training and placement, as well as counseling can be highly effective in helping young people experiencing homelessness to overcome their circumstances and fulfill their potential.

### **3. Nature and Extent of Homelessness by Racial and Ethnic Group**

Per the 2022 Homeless count, approximately 716 persons, including families with children, are homeless and are in immediate need of housing. This does not include families that are precariously housed and at-risk of becoming homeless.

At an average family size of 3.56, households within the City of Pomona tend to be larger than the average US city.) Generally speaking, to address this average family size, larger apartments, with more legal living areas, at affordable prices are required to assist homeless families, including families of veterans. The 2022 Greater Los Angeles Homeless Count - SPA 3 Data Summary provides the homeless population data for San Gabriel Valley in the following tables.

Ethnicity	Homeless Population	General Population
	Percentage	Percentage
Hispanic/Latino	56%	71.4%
Non-Hispanic/Non- Latino	44%	28.6%

**Table 30 - Greater Los Angeles Homeless Count**

Race	Homeless Population	General Population	Race	Homeless Population	General Population
American Indian/Alaskan Native	0%	2.5%	Asian	0%	10.8%
Black/African American	17%	5.9%	Native Hawaiian/Other Pacific Islander	0%	<1%
White	25%	33.7%			

**Table 31 – Greater Los Angeles Homeless Count**

**Data Source:** 2022 Greater Los Angeles Homeless Count - SPA 3. Data references the San Gabriel Valley level and includes City of Pomona. *Demographic data down to the City of Pomona level is not available.*

The City of Pomona has in place an Outreach Team with multi-ethnic and multi-racial representation to reach out appropriately and in a culturally sensitive manner to all races and ethnicities to the greatest extent possible.

#### **4. Nature and extent of unsheltered and sheltered homelessness**

City resources assisting the homeless population include a continuum of emergency shelters, transitional housing and supportive services. The Pomona Continuum of Care Coalition (PCOCC) is a local coalition of over 100 active members, representing over 40 community-based organizations, faith based organizations and county government programs.

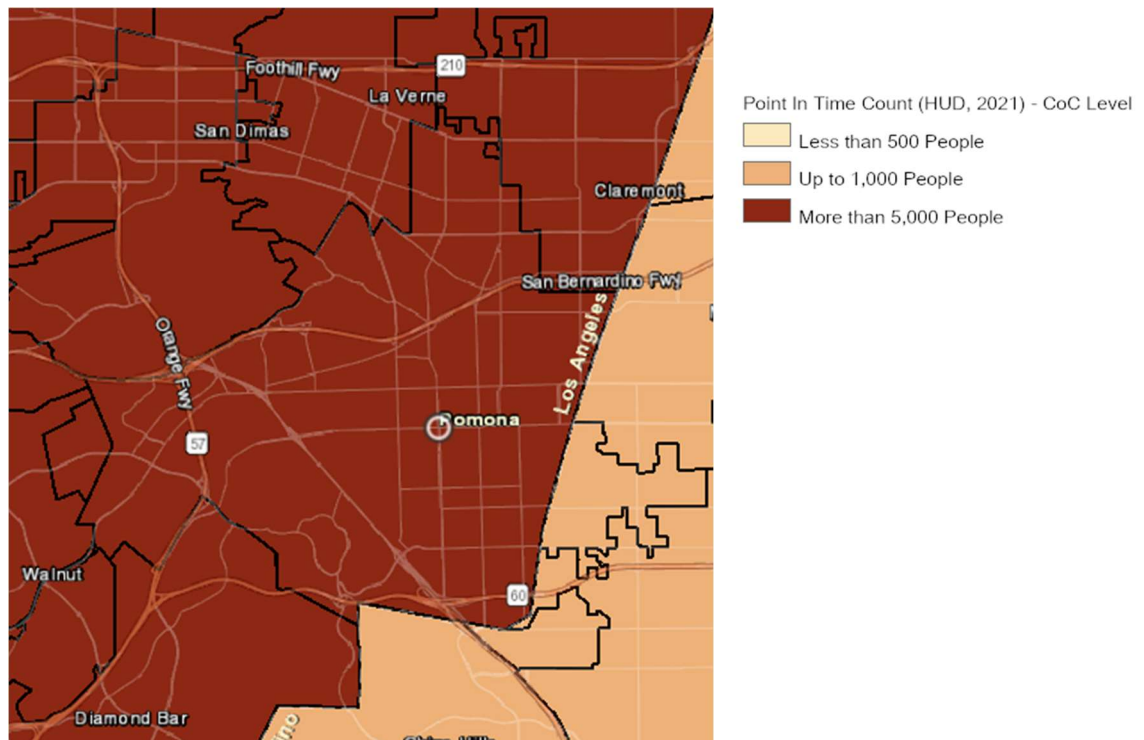
The Winter Shelter Program operates from November 1 to March 31. During FY 22-23, the Winter Shelter remained open year-round with funding assistance from the County of Los Angeles. About 1/3 of the population served comes to Pomona from outside of the city. The Winter Shelter Program has a bed capacity of 190 per night throughout Los Angeles County.

Hope for Home (H4H) opened in December 2018 and is operated by Volunteers of America Los Angeles (VOALA). who oversees the day-to-day activity and shelter bed utilization. H4H provides 205 shelter beds, and supportive services (e.g., case management, substance abuse, mental health, etc.). The opening of the shelter has assisted with the success of moving individuals from crisis or transitional housing and into a permanent placement.

### Homeless Needs

As outlined in the City' Homeless Strategy, a collaborative effort between the City, Community Stakeholders and homeless persons must be taken to find community solutions to homelessness. Shelter and support services appear to be the greatest needs for the homeless. The top priority needs for the homeless priority category were identified as follows:

- Homeless Shelters/Facilities
- Homeless Services



Source: California Department of Housing and Community Development – AFFH Data Viewer

**NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT – 91.205(B,D)****1. Introduction**

Roughly 15,543 people in Pomona, or 11.12% percent of City residents five years of age or older, had some sort of disability as of 2021. This is similar to the County 10.68% and State 11.28% disability rates. Under the Institute of Medicine (IOM) and the International Classification of Functioning, Disability, and Health (ICF), disability is defined as the product of interactions among individuals' bodies; their physical, emotional, and mental health; and the physical and social environment in which they live, work, or play. The U.S. Census Bureau, American Community Survey (ACS) attempts to capture six aspects of disability: hearing, vision, cognitive, ambulatory, self-care, and independent living. A more detailed description of each disability is provided below:

- Hearing disability: Refers to deafness or serious difficulty hearing.
- Vision disability: Refers to blindness or serious difficulty seeing even when wearing glasses.
- Cognitive disability: Refers to serious difficulty concentrating, remembering, or making decisions.
- Ambulatory disability: Refers to serious difficulty walking or climbing stairs.
- Self-care disability: Refers to a condition that restricts ability to dress or bathe.
- Independent living difficulty: Refers to a condition that restricts ability doing errands alone such as visiting a doctor's office or shopping.

Types of disability by subpopulation is indicated below. Among the 17,158 elderly residents in the City 38.93% had one or more disabilities. Members of this group are particularly vulnerable not only because of their frail condition but also because of their often fixed and limited incomes.

Elderly and Frail Elderly - The U.S. Census 2017-2021 American Community Survey indicates that 11.42% of Pomona's population is over 65 years old, 17,158 persons, in comparison to 115.92% of the U.S. population.

The supportive needs of the disabled and elderly are met through the City's Senior Services Programs in coordination with Los Angeles County's Senior Service activities. These programs provide low-income elderly with some options that allow them to live independently but in an environment that provides support activities such as cleaning,

cooking, transportation, etc. Also, through our continued partnership with the Los Angeles County Community Development Commission, approximately 86 units of subsidized senior housing are located in Pomona.

Nine apartment buildings within the City of Pomona offer housing specifically for the elderly:

**Table 32 - Senior Housing Developments in Pomona**

Development	No. of Units
Serenity Villas - 158 E. Bonita Ave.	174
Emerson Village - 755 N. Palomares St.	164
Portofino Villas - 121 W. Phillips Blvd.	174
Las Brisas Apartments - 200 Beaver Ct.	80
Pacific Villas - 3642 N. Garey Ave.	132
Shield Village - 1371 W. Holt	63
La Esperanza Apts. - 1550 S. San	70
Olivera Senior Apts – 600 S Dudley St.	84
Total	941

Approximately 941 units are available to very-low, low- and moderate-income seniors through this network of senior housing. Emerson Village offers assisted living for the disabled.

Persons with Disabilities – Roughly 15,543 people in Pomona, or 11.12% percent of City residents five years of age or older, had some sort of disability as of 2021. This is lower than the portion of the national population, which is 13.4%. Non-residential and housing assistance are provided to persons with disabilities through the Services Center for Independent Living, the Department of Social Services, and the Rehabilitation Center. Casa Colina, one of the premier rehabilitation facilities in the country, is located in the City of Pomona. In addition to adult day care, Casa Colina has residential facilities available at alternate campuses for those disabled with brain injuries and developmental disabilities. The Adult Day Care Center of Pomona offers transportation and stimulating activities for disabled adults during daytime hours.

Persons with Alcohol or Drug Addiction - Residential facilities are offered for persons with drug and alcohol addictions at American Recovery. 25 units are available for individuals, as well as families with children. Low-income persons that are not homeless may utilize these facilities, as can the homeless.

Prototypes residential facilities and apartments will accommodate both homeless and non-homeless low-income families with children that are working to overcome substance abuse. BRIDGES offers methadone treatment to those dealing with opiate addiction and mental health care combined with substance abuse treatment for those with dual-diagnosis.

## **2. Housing and Supportive Service Needs of Special Populations and How Determined**

The top priority need for the special needs category was identified as follows:

- Accessibility Improvements
- Substance Abuse Services
- Domestic Violence Services
- Centers/Services for Disabled

## **3. Size and Characteristics of the HIV/AIDs Population and Their Families**

Persons with HIV/AIDs - Research by the Centers of Disease Control and Los Angeles County Department of HIV/AIDS reports that 11.4% of persons living with HIV/AIDS were unaware. Pomona is located within Service Planning Area Three, which has an 8% HIV/AIDS infection rate for Los Angeles County. 229 HIV/AIDS diagnoses were reported according to the 2020-21 Los Angeles County Annual HIV Surveillance Report. According to the Los Angeles County Department of Health Services as of December 31, 2021, there were 1,197 persons living with diagnosed HIV/AIDS in the City of Pomona, which is 2% of the County total.

The City of Pomona is not a recipient of HOPWA funds.



**NA-50 Non-Housing Community Development Needs – 91.215(f)**

Community development needs are typically funded with CDBG funds. As such, those needs must meet a two (2)-fold test. They must be an eligible community development activity and must meet one of HUD's National Objectives.

Non-Housing community development needs fall into the following categories:

- Infrastructure Improvements
- Public/Community Facility Improvements
- Public Services
- Accessibility Needs
- Economic Development Needs

Determination of needs were identified through outreach to community stakeholders via survey, public meetings, public hearings, infrastructure reports and improvement plans, and input from community-based organizations.

**1. Public Facility Needs**

Public facilities serve to meet the needs of low-income residents of an entire area and include but are not limited to construction, rehabilitation or improvements to public facilities. Survey results indicated that the following are top priority needs in this category:

- Senior Centers
- Youth Centers
- Health Care Facilities
- Community Centers

**2. Public Improvement Needs**

Public Infrastructure improvements serve to meet the needs of low-income residents of an entire area and include but are not limited to, alley, street, sidewalk, curb, gutter and street light improvements. Survey results indicated that the following are top priority needs in this category:

- Street Lighting
- Water/Sewer Improvements
- Street/Alley Improvements
- Sidewalk Improvements

### **Accessibility Needs**

Accessibility improvements serve to meet the needs of disabled persons. Survey results indicated the following needs in this category:

- Housing for the Disabled
- Accessibility Improvements for Persons with Special Needs

While survey rankings were relatively low for the above-mentioned needs, the City's Public Works Department identified the following as priority needs:

- Curb Ramps
- ADA Paths of Travel (Alley and Sidewalk continuation)

### **3. Public Services Needs**

Public services provide access to programs or services that meet the needs of low-income residents. Survey results indicated that the following are top priority needs in this category:

- Homeless Shelter and Services
- Anti-Crime Programs
- Youth Activities
- Youth Employment
- Senior Services
- Child Care
- Health Services
- Mental Health Services
- Graffiti Removal
- Clean-up Abandoned Lots and Buildings
- Trash & Debris Removal
- Services in a location within your District or Neighborhood
- Services through the Internet
- Services at a central location or building

#### **4. Economic Development**

The top priority needs for the economic development priority category were identified as follows:

- Employment Training
- Job Creation/Retention
- Start-up Business Assistance

#### IV. MARKET ANALYSIS

##### MA-05 OVERVIEW

This section of the Consolidated Plan represents an examination of the City's Housing Market and provides a Needs Assessment. It encompasses the following aspects of the current housing market:

Supply: Current Housing Stock by Size of Units, Units in Structure and Age; Recent Permit Activity; Available Vacant Land;

Demand: Number of Households by Size and Type; Vacancy Rates; Population Growth; and

Supply vs. Demand: Sales Data; Rent Increases; Overcrowding; Cost Burden

The City of Pomona represents a wide variety of attributes and lifestyles, and the housing stock includes a range of ages, qualities and arrangements. Certain overarching trends and facts are important in considering the City's needs. The most prominent of these trends are summarized below:

##### **Population Growth**

The population of the City of Pomona according to most recent 2020 Census data is 151,713. This represents an approximate 1.7% growth over the 2010 population figure of 149,058.

Population growth in the City of Pomona between 1990 and 2010 has averaged around 1.4 percent per year. After a significant population increase during the 1980s (42.0%), the City's growth moderated somewhat, with its population increasing by 13.5 percent during the 1990s and by another 8.4 percent between 2000 and 2007. The City has been growing faster than Los Angeles County as a whole, especially during the 1980s when the county population increased 18.5 percent.

According to Southern California Association of Governments (SCAG) the City of Pomona is forecast to increase by 26.3 percent through 2040. Compared to the rest of the County, Pomona's population will grow by approximately 10 percent more than surrounding cities. The City's population growth forecast is also greater than the Cities

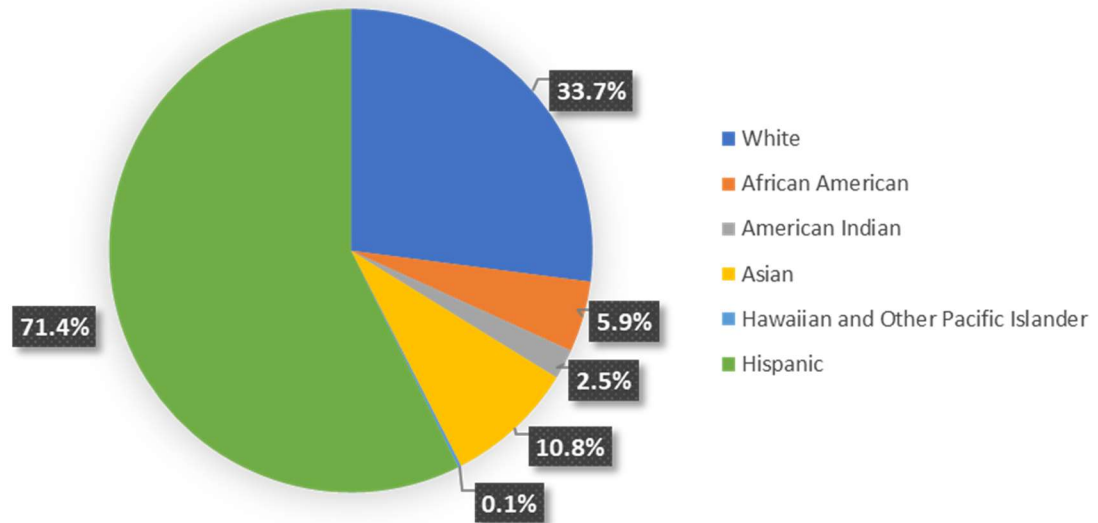
of Diamond Bar and Claremont; however, the Cities of Ontario and Chino are projected to experience almost double the population growth of Pomona.

### **Race and Ethnicity**

Race and ethnicity are an important factor in housing, as it may impact housing needs and conditions, affecting demand for types of housing style and size. For example, some cultures have an inclination toward larger households that include extended family members for whom apartment buildings and small dwelling units may not be adequate.

Pomona is growing increasingly diverse. In recent decades, both the White population and the Black population in the City experienced a decline of approximately 50 percent. However, according to recent 2020 Census data, the White population has increased 21% respectively over the past decade up from 12.5% in 2010, while the black population continues to decline by just under 1% during this same period. The Asian and American Indian populations have also experienced slight increases since 2010. Housing choices among different groups can vary according to cultural practices.

The City of Pomona has one the lowest White population than the surrounding cities and the County. The American Indian/Alaska Native and Some Other Race populations in Pomona have the highest percentages when compared to the surrounding cities and the rest of Los Angeles County. The City of Pomona also has an Asian population that represents the lowest percentages in comparison to the surrounding area. The City of Pomona has a much greater population of individuals identifying as Hispanic or Latino than Los Angeles County at 71.4 percent compared to 48.5 percent.

**Table 34 - Race and Ethnic Composition (City of Pomona)**

**Source:** US. Census Bureau, U.S. Census 2020

According to the Census, the ethnic composition of the City's population dramatically changed from 47 percent White and 31 percent Hispanic in 1980, to 17 percent White and 65 percent Hispanic in 2000. In 2010, of Pomona's surrounding cities, Montclair had a similarly high proportion of Hispanic residents (70 percent). The surrounding jurisdictions have seen increasing Hispanic populations in the previous decades; however, the Hispanic population is present at much lower ratios in these communities than in the City of Pomona. More than 7 out of 10 residents in Pomona identify as Hispanic or Latino, which is among the highest rates in Los Angeles County.

#### **Areas of Racial/Ethnic Minority Concentration**

Race and ethnicity may impact housing needs and conditions, affecting the demand for various housing types and sizes. For example, extended family households common to certain cultures increase the demand for larger dwellings with floor plans suitable for such households.

The racial and ethnic makeup of Pomona is generally consistent with that of Los Angeles County, as a whole. According to the American Community Survey, 5-Year Estimate data for 2019, made up of mostly White Alone individuals at 47.5 percent

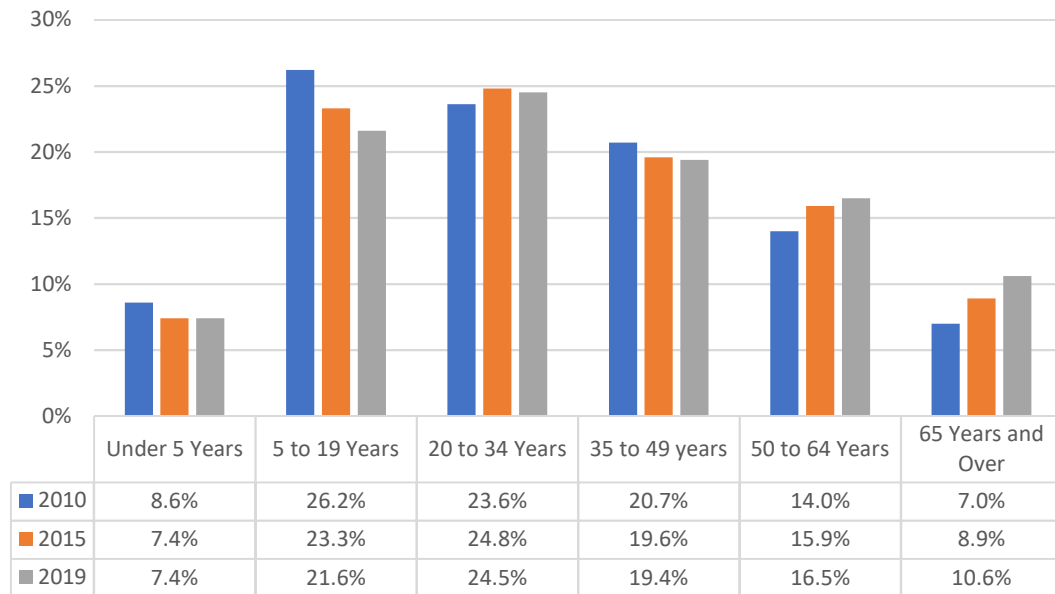
followed by 29.6 percent of individuals who identify as Some Other Race. Compared to Los Angeles County, Pomona has smaller White, Asian, and Black or African American populations. Those identifying as American Indian/Alaska Native and Native Hawaiian/Other Pacific Islander represent the smallest racial groups in both Pomona and Los Angeles County. Additionally, Pomona's American Indian/Alaska Native population is approximately 2 percent greater than Los Angeles County's. The majority of residents in Pomona and surrounding cities identified as White.

Like many Southern California communities, Pomona has a changing racial/ethnic composition. Pomona population that identifies as White and Some Other Race have 40th experienced the greatest fluctuations between 2010 and 2019. In 2015, the White population grew by 15 percent, while those identifying as Some Other Race decreased by 15 percent. The Black or African American population has been steadily decreasing (a 2.6 percent total decrease), while the Asian and American Indian/Alaska Native populations have increase increased from 7.8 percent to 10.2 percent and 0.7 percent to 2.4 percent, respectively.

An area of racial/ethnic minority concentration is defined as a census tract that contains a minority population of fifty (50) percent or more. A review of the 2020 census data indicates that minority population groups continue to represent the majority of the population of the City and are dispersed throughout the community. In 2020 the City's population was estimated at 151,713 of which 87.5% belonged to a racial or minority group. At the census tract level, the majority of the population ranges from a low of 50.41% (4032.00) to a high of 97.5% (4025.01). In fact, census tract 4032.00 is the only census tract that had a minority population of less than 50% because it is the location of California State Polytechnic University Pomona campus.

## **Age**

Pomona's age distribution has continued to shift substantially in the past 10 years. In 2010, those between 5 and 19 years of age made up the largest percentage of the population. More recently, in 2015 and 2019, persons between 20 and 34 years of age make up the largest percent of the population. Table 32 shows that between 2010 and 2019 the general age of the population has been increasing; the percentage of children and young adults under 19 has decreased from a total of 35.2 percent to 29 percent. Meanwhile, those over the age of 50 have increased from 21 percent to 27.1 percent. Adults aged 20 to 34 years have maintained the most stable percentages over the 9 years, possibly due to the number of students attending local universities.

**Table – 35 Age Distribution in Pomona (2010 – 2019)**

**Source:** American Community Survey, 5-Year Estimates, 2010, 2015, 2019

### Household Size and Type

The US Census Bureau defines a “household” as all the people who occupy a housing unit as their usual place of residence regardless of the relationship to one another. In comparison, dormitories and convalescent/nursing homes are typically categorized as group quarters and persons residing in these housing arrangements are not considered households.

Table 33 summarizes household changes from 2010 through 2019 according to the American Community Survey, 5-Year Estimates, 2019. Married-couple family households experienced the greatest decrease (2 percent); female households with no spouse present also decreased 1 percent. In comparison, non-family households grew by about 3 percent. Senior households experience the most growth at 6 percent in 9 years.

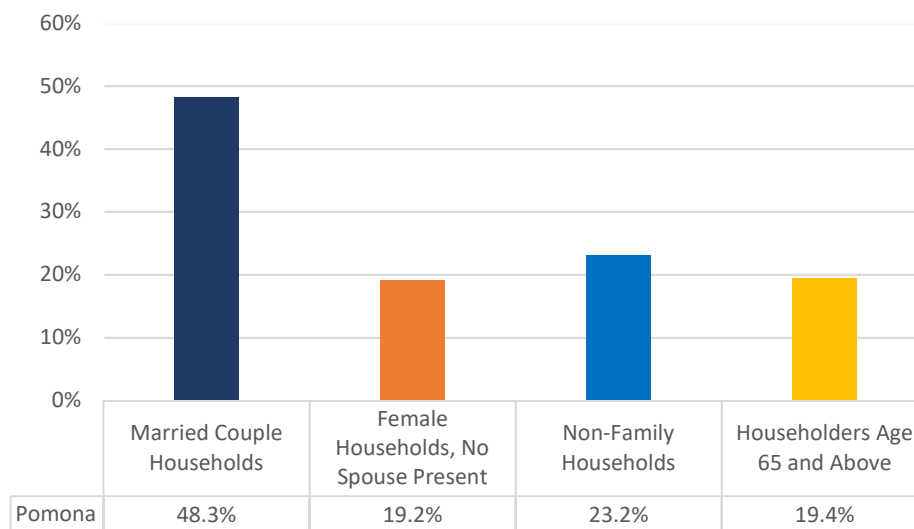


**Table 36 - Pomona Changes in Household Types**

Household Type	2010	Percent	2015	Percent	2019	Percent
Married Couple, Family Households	19,383	50.3%	19,531	49.6%	18,886	48.3%
Female Households, No Spouse Present	7,707	20%	7,600	19.3%	7,523	19.2%
Non-Family Household*	7,977	20.7%	8,899	22.6%	9,060	23.2%
Householder 65 Years and Older	5,125	13.3%	6,379	16.2%	7,575	19.4%
Total Households	38,535	100%	39,378	100%	39,097	100%

Source: American Community Survey, 5-Years Estimates, 2010, 2015, 2019  
*\*Non-Family Households include unrelated persons living in one housing unit, e.g., persons living alone, partners or couples cohabitating.*

Pomona is a family-oriented community, with approximately 76% of the households being families. Non-family households consist primarily of single-person households, including seniors living alone. The table below shows the household composition in Pomona, reported in the American Community Survey, 5-Year Estimates, 2019.

**Table 37 - Pomona Household Characteristics (2019)**

**Source:** American Community Survey, 5-Year Estimates, 2019

The City of Pomona is forecast to have household growth about 10 percent over that of the County, but less than the growth anticipated for the Cities of Chino and Ontario. Pomona has an average household size of 3.77 in 2019, almost 1 person per household more than Los Angeles County (2.99). Pomona's average household size is the largest of the surrounding cities.

### **Household Income**

Income is a major factor influencing the demand for housing and ability to pay for it, and reflects the affordability of housing in a community. Median income is a commonly used measurement of community income. Unlike average income, median income is not overly influenced by particularly low and high reported incomes but rather reflects the state of the community: half of the population is above the median income and half is below it.

Median household income is used as a measure of broader community income, as the term "household" covers all living situations, not just families. In comparison to families, households include non-family living situations, such as single-person units and non-related roommates.

As of 2019, the median household income for the City of Pomona was \$60,598, which is \$7,446 below Los Angeles County's median household income of \$68,044. The U.S. Department of Housing and Urban Development (HUD) sets income categories based on Median Family Income, or MFI. Based on these income categories, nearly two out of three households (61.5 percent) in Pomona are considered lower income and depending on housing prices in the City, may not be able to afford housing within the immediate area.

In defining income groups, the California Department of Housing and Community Development (HCD) uses the income limits set by the US Department of Housing and Urban Development (HUD). HUD sets an area median income (AMI) which is usually the median family income (MFI) for a PMSA (Primary Metropolitan Statistical Area, as defined by the Federal Office of Management and Budget). Income groups defined by HCD are as follows:

- Extremely low income: earning less than 30% of the AMI;
- Very low income: earning between 30% and 50% of the AMI;
- Low income: earning between 50% and 80% of the AMI;

- Moderate income: earning between 80% and 120% of the AMI; and Above moderate income: earning more than 120% of the AMI.

Extremely low-income, very low-income and low-income households are typically referred to more generally as “lower-income” households.

As indicated below, in the data table, 61.5% of the households in Pomona are considered to be lower income, a 17.5% increase from 2010.

**Table 38 - Household by Income Category in Pomona**

Income Category (% of County MFI)	Households	Percent
Extremely Low (30% MFI or less)	8,300	21.4%
Very Low (30% to 50% MFI)	7,230	18.6%
Low (50% to 80% MFI)	8,375	21.5%
Subtotal	23,905	61.5%
Moderate or Above (Over 80% MFI)	14,960	38.5%
Total	38,870	100%
<b>Source:</b> Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS), 2013-2017		

Median family income (MFI) is a baseline upon which family poverty levels and financial risk are based. The MFI in Pomona, as of 2019, was \$60,598. The table below presents the income distribution in Pomona according to American Community Survey, 5-Year Estimates, 2019 data.

**Table 39 – Family Incomes in Pomona**

Family Incomes in Pomona (2019)		
	<i>Number of Families</i>	<i>% of Families</i>
Less than \$10,000	1,876	4.8%
\$10,000 to \$14,999	1,642	4.2%
\$15,000 to \$24,999	3,558	9.1%
\$25,000 to \$34,999	3,910	10.0%
\$35,000 to \$49,999	5,161	13.2%
\$50,000 to \$74,999	7,116	18.2%
\$75,000 to \$99,999	5,864	15.0%
\$100,000 to \$149,999	5,982	15.3%
\$150,000 to \$199,999	2,346	6.0%
\$200,000 or more	1,642	4.2%

<b>Total</b>	<b>30,097</b>	<b>100%</b>
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Source: ACS, 5-Year Estimate, 2019

**MA-10 NUMBER OF HOUSING UNITS – 24 CFR 91.210(A) & (B)(2)****1. Introduction Housing Supply**

The number of housing units in Pomona has increased slightly between 2010 and 2015. Pomona added 268 units from 2017 through 2021 Pomona has one of the lowest vacancy rates of the surrounding cities. At 4.3 percent, Pomona’s vacancy rate is about 2 percent below Los Angeles County and 3 percent below Chino. Diamond Bar has the lowest vacancy rate at 1 percent below Pomona’s (3.4 percent). Of Pomona’s vacant units, a large portion are vacant for unknown reasons, according to American Community Survey data (48.8 percent). Just under 20 percent of vacant units are up for rent and 24.5 percent are either on the market or have already been sold but are not yet occupied. As of 2019, single unit detached homes made up the majority of the Pomona housing stock (62.9 percent). Single unit attached homes, which include townhomes and condominiums, made up another 6.4 percent. Multi-unit developments, such as apartments, made up 26.5 percent of the housing stock and 4 percent were mobile homes. In comparison to the rest of the County, Pomona has a higher percentage of single unit detached homes and a lower percentage of multi-unit developments. The table below reflect residential properties by number of units based on 2017- 2021 ACS data:

**All residential properties by number of units**

<b>Property Type</b>	<b>Number</b>	<b>%</b>
1-unit detached structure	25,456	61%
1-unit, attached structure	3,047	7%
2-4 units	2,942	7%
5-9 units	1,883	5%
10 or more units	5,961	15%
Mobile Home, boat, RV, van, etc.	2,168	5%
<b>Total</b>	<b>41,457</b>	<b>100%</b>

**Table 40 – Residential Properties by Unit Number**

Data Source: 2017-2021 ACS

### Housing Tenure

The ratio between homeowner and renter households can be affected by several factors, such as housing costs (interest rates, economics, and land, materials, and labor costs), housing type, housing availability, and preference.

Household size differs between renter and owner-occupied housing units. In addition, family households generally occupy larger housing units such as single-unit homes. The City of Pomona housing stock includes 20,621 owner-occupied housing units and 18,476 renter occupied housing units. The large majority of owner-occupied homes are single unit detached structures, while for renters the majority are multi-unit developments. The average household size for owner and renter households in Pomona are similar (3.78 and 3.76, respectively). Los Angeles County's overall household size of 2.99 reflects almost an entire person difference with Pomona.

One of the gauges of strong communities is the rate of homeownership. The City sees an ongoing need to support homeownership within the community, as well as to ensure that there is a sufficient quantity of both single-family for homeownership and affordable multi-family units available to residents.

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	441	2.1%	1,348	6.9%
1 bedroom	278	1.4%	5,082	26%
2 or 3 bedrooms	14,934	72.5%	12,102	61.9%
4 or more bedrooms	4,938	24%	1,019	5.2%
<b>Total</b>	<b>20,591</b>	<b>101%</b>	<b>19,551</b>	<b>100%</b>

**Table 41 – Unit Size by Tenure**

**Data Source:** 2017-2021 ACS

## 2. Number and Targeting of Units Assisted with Federal, State, Local Programs

Most of the City's housing programs do not target a specific size or type of family. As Federal and State funds are the primary source of many programs, households with 0-80% AMI are targeted. Housing programs offer a range of options for both single-family and multi-family housing, including, first-time homebuyer, housing rehabilitation and rental assistance program for eligible households and eligible units.

## 3. Units Expected to be Lost from Inventory

There are a total of 466 assisted housing units in Pomona at-risk of converting to market-rate between 2021 and 2031. These units are listed in Table 39 below:

**Table 42 – Units At-Risk of Conversion from 2021-2031**

Project Name	Assisted Units	Unit Type		Assistance Program	Earliest Possible Date of Conversion
		1 Bed	2 Bed		
Emerson Village	164	156	8	Very low and low income (seniors & disabled)	NA <sup>2</sup>
Park Plaza Apts. <sup>1</sup>	302	302	0	Very low, low, and moderate income (seniors & families)	2026
<b>TOTAL AT-RISK UNITS</b>	<b>466</b>	<b>458</b>	<b>8</b>		

1. Breakdown of number of units by bedrooms is unavailable – units assumed at one-bedroom.

2. The deed restriction for Emerson Village expired in 2018; however, the units are still being rented at affordable rates.

3. **Source:** City of Pomona

To address the risk of affordable units converting to market rate housing, the City has established a program to monitor these units. The City will actively work to create programs and seek additional funding in which the focus is to preserve these units beyond the expiration of the covenant so that residents have a variety of affordable housing options.

## 4. Does the Availability of Housing Units Meet the Needs of the Population?

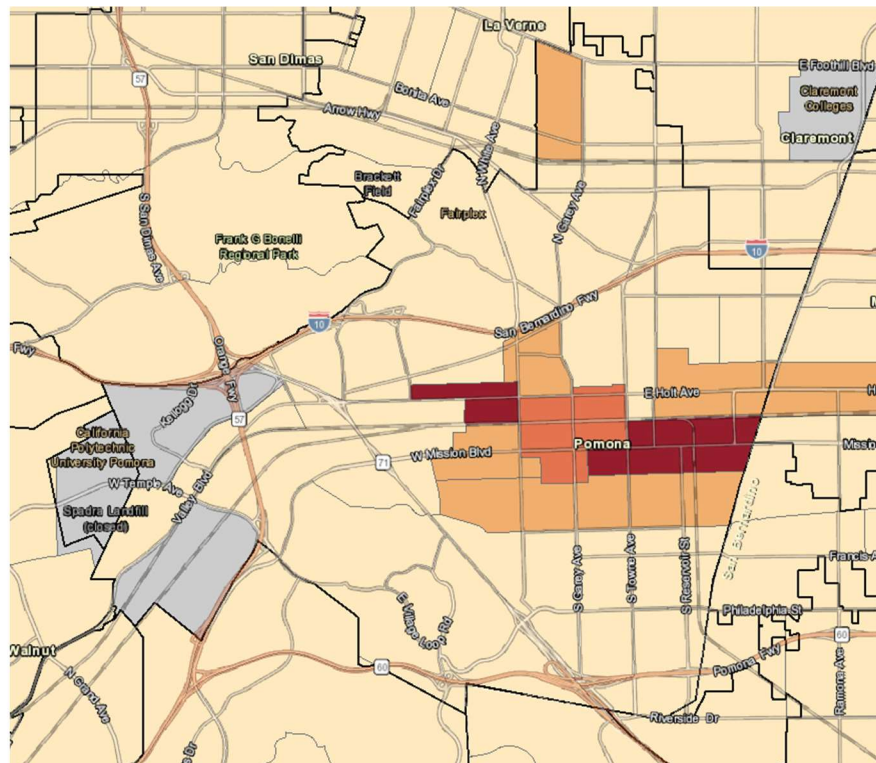
The availability of housing units in the City does not meet the needs of low-income residents. There is a high-cost rate for the purchasing of housing units and often renting of units; thus, there is often severe cost burden and overcrowding. Further,

an indication that housing units do not meet the population's needs is that available housing stock has one or more housing problems.

## 5. Need for Specific Types of Housing

Based on feedback from the community, survey data and census data, the City's current housing market indicates a need for the following specific types of housing:

- Affordable, accessible housing for persons with disabilities
- Affordable housing with services for families
- Permanent supportive housing for a variety of persons with special needs, including the chronically homeless individuals and families, transitional youth, persons with chronic mental illness, and others.
- Affordable housing for large families



Estimated Displacement Risk - Overall Displacement (UCB, Urban Displacement Project 2022) - Tract

Low Data Quality

Lower Displacement Risk

At Risk of Displacement

1 Income Group (Very Low Income or Low Income) is experiencing Elevated, High, or Extreme Displacement

2 Income Groups (Very Low Income and Low Income) are experiencing Elevated, High, or Extreme Displacement

Source: California Department of Housing and Community Development – AFFH Data Viewer



**MA-15 HOUSING MARKET ANALYSIS: COST OF HOUSING – 91.210(A)****1. Introduction****Cost of Rental Housing**

According to the American Community Survey, 5-Year Estimates, 2015-2019 data, the median gross rent in Pomona is estimated to be \$1,362 a month, which is the lowest value compared to the surrounding cities and the County. Pomona's median gross rent value is approximately \$98 less per month than Los Angeles County and \$709 less per month than neighboring city Diamond Bar, which has the highest value. Therefore, as stated, median rents in Pomona have been consistently lower than those in Los Angeles County.

**Affordable Rental Housing**

Efforts to address affordable rental housing during the Consolidated Plan period may include acquisition and/or rehabilitation of rental housing for low- to moderate-income families. Any projects deemed beneficial to the low-to-moderate income population will be assessed prior to funding to minimize displacement. If a project entails acquisition of real property where tenants may be displaced, the City will adhere to all relocation and real property acquisition requirements.

On April 17, 2023, the City of Pomona adopted Urgency Ordinance No. 4329 for the purpose of amending Urgency Ordinance No. 4320, previously passed on August 1, 2022. The intent of the Urgency Ordinance No. 4320 was to create regulatory framework and other protections for residents facing rental housing instability. Urgency Ordinance No. 4329 impactfully expands upon and increases the original Relocation Assistance available to tenants in not-at-fault evictions proceedings, as well as enhances rent stabilization initiatives actively being explored by the City to stabilize housing rent burden on its residents. Urgency Ordinance No. 4329 reinforces rent restrictions, expands upon relocation assistance, and promotes just-cause eviction practices by Landlords.

Other activities to be undertaken to address affordable rental housing include implementation of a HOME-funded Tenant-Based Rental Assistance Program. The TBRA Program will provide rental assistance, utility cost and/or utility deposits to low-income households.

Local market conditions that led to the use of HOME funds for TBRA are affordability and housing costs. ACS data shows that households in the City experience the highest levels of cost burden above 30 percent but less than 50 percent (75.1 percent). Additionally, households in higher rates of cost burden greater than 50 percent (23.2 percent), compared to the State (19.4 percent) but similar to the County (23.3 percent). Cost burden equates to a high rate of overpayment for rents compounded with a slower growth in income. This inability to afford rent levels creates housing that is overcrowded and families that are at risk of becoming homeless. Therefore, a TBRA program would utilize HOME funds to assist in the affordability gap.

### **Cost of Owner-Occupied Housing**

Housing cost differs by whether a housing unit is owner-occupied or rented. Based on surveys of classified and real estate ads, renters in Pomona are primarily offered one and two-bedroom units, while owner-occupied housing is primarily two, three and four-bedroom units.

The percentage of Pomona households that owned their home in 2020 was 52.6 percent, a very small decrease from the rate of 53 percent in 2010. This is a higher percentage than the homeownership rate of Los Angeles County, which was at 47.7 percent in 2010 and has since decreased to 46.2 percent according to ACS data for 2017-2021.

The median home value in Pomona is estimated to be \$394,500, which is one of the lowest values compared to nearby cities and the County. Pomona's median home value is approximately \$188,700 less than Los Angeles County and \$278,000 less than Diamond Bar, which has the highest value. According to data gathered from Zillow, the median home value in Pomona in 2021 is \$586,939 which is 11 percent higher than the value of the American Community Survey 5-Year Estimate (2017-2021) as seen in the table below. According to Zillow, the median home value in Pomona is 21.2 percent higher in 2021 than that of 2020. The median home value of homes in Pomona in 2020 was \$474,247 which is higher value than the American Community Survey 5-Year Estimates available for 2019. House prices have risen considerably in the City in recent decades. This has ongoing implications for home ownership purchase and affordability. As housing prices climb, fewer income earners will be able to afford the median-priced house in Pomona.

**Cost of Housing**

	<b>Base Year: 2013</b>	<b>Most Recent Year: 2021</b>	<b>% Change</b>
Median Home Value	258,700	523,300	102%
Median Contract Rent	996	1,468	47%

**Table 43 – Cost of Housing**

**Data Source:** 2009-2013 ACS (Base Year), 20017-2021 ACS (Most Recent Year)

<b>Median Gross Rent by Bedrooms</b>						
<b>Unit Size</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>Percent Change 2015-2019</b>
Studio	\$917	\$916	\$965	\$998	\$983	7.2%
1 Bedroom	\$867	\$887	\$930	\$985	\$1,062	22.5%
2 Bedrooms	\$1,160	\$1,192	\$1,244	\$1,272	\$1,346	16.0%
3 Bedrooms	\$1,532	\$1,557	\$1,590	\$1,614	\$1,714	11.9%
4 Bedrooms	\$1,743	\$1,751	\$1,899	\$1,940	\$2,081	19.4%
5 or More Bedrooms	\$1,838	\$1,922	\$2,027	\$1,833	\$2,169	18.0%
<b>Median Gross Rent</b>	<b>\$1,150</b>	<b>\$1,183</b>	<b>\$1,246</b>	<b>\$1,289</b>	<b>\$1,362</b>	<b>18.4%</b>
<b>Source:</b> American Community Survey, 5-Year Estimates, 2015, 2016, 2017, 2018, 2019						

**Table 44 – Median Gross Rent by Bedrooms****Rent Paid**

<b>Rent Paid</b>	<b>Number</b>	<b>%</b>
Less than \$500	898	4.8%
\$500-999	2,164	11.6%
\$1,000-1,499	6,538	35.1%
\$1,500-1,999	5,513	29.6%
\$2,000 or more	3,533	18.9%
<b>TOTAL</b>	<b>18,646</b>	<b>100%</b>

**Table 45 - Rent Paid**

**Source:** American Community Survey, 5-Year Estimates, 2017-2021

**Housing Affordability Table**

<b>% of Units Affordable to Household Earning</b>	<b>Renter</b>	<b>Owner</b>
<b>30% HAMFI</b>	<b>37.8%</b>	<b>14.0%</b>
<b>50% HAMFI</b>	<b>33.2%</b>	<b>20.3%</b>
<b>80% HAMFI</b>	<b>8.3%</b>	<b>13.3%</b>
<b>100% HAMFI</b>	<b>20.8%</b>	<b>52.4%</b>
<b>Total</b>	<b>100%</b>	<b>100%</b>

**Table 46 – Housing Affordability**

**Data Source:** American Community Survey, 5-Year Estimates, 2017-2021

**MONTHLY RENT**

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	1384	1604	2044	2693	2933
High HOME Rent	1335	1432	1721	1979	2188
Low HOME Rent	1042	1116	1340	1548	1727

**Table 47 – Monthly Rent**

**Data Source:** 2022 HUD FMR and HOME Rents for Los Angeles-Long Beach-Glendale MSA

### **Availability of Sufficient Housing**

There is insufficient housing that is affordable to households at all income levels. This is apparent from the Census data and other sources cited in the ConPlan, which show high levels of housing cost burden, overcrowding and homelessness. Approximately 31 percent of City households are large households, where the majority is renter- households. Approximately 10.6% of Pomona residents were seniors as of 2019. They have a need for housing with access to nearby medical, shops, services and open space. Population growth and composition will determine the amount and type of affordable housing needed in the next decade.

**Expected Change of Housing Affordability**

According to the 2010 US Census, around 47.4 percent of Pomona households lived in rented housing. Monthly rent for a one bedroom in Pomona has increased from \$867 to \$1,062 (22.5 percent) between 2015 and 2019; experiencing the most price increase of all bedrooms. Studios saw the least amount of price increase at 7.2 percent. In general, all rentals saw an increase in prices over these 5 years, with the median gross rent increasing by 18.4 percent from \$1,150 to \$1,362. In comparison, the median income for Pomona households increased by 23.2 percent between 2019 and 2015 – from \$49,186 to \$60,598 annually Median rents in Pomona have been consistently lower than those in Los Angeles County.

Although rents remained relatively stable during the early 1990s, they have increased substantially during the past 30 years, fueled by a continued scarcity of housing and increased demand. It is difficult to know the expected change in housing affordability, but it is anticipated that housing prices will continue to rise.

**Rent Comparison**

The HOME rent limits ensure that units assisted with HOME funds are affordable to low and very low-income households. HOME rent limits include tenant's utility expenses. The FMR's represent the maximum housing cost (rent and utilities) paid by Housing Authorities to landlords providing housing to tenants with Section 8 Housing Choice Vouchers. Both FMR's and HOME rents typically increase annually based on unit size. They impact the City's strategy to produce or preserve affordable housing greatly and low-income households benefit from the restricted low rents. For a review of rental housing costs see tables 40-42.

**MA-20 HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210 (A)****1. Introduction****Age of Housing Stock**

According to the 2010 Census, 72% percent of all housing in Pomona was developed between 1950 and 1980 with almost 57% percent of the City's housing stock being over forty (40) years old. The tables below show the year units were built, the condition of occupied units, vacant units and units at risk of lead-based paint hazards.

	Renter		Owner	
	Number	%	Number	%
With one selected condition	9,661	49.6%	7,502	34.1%
With two selected conditions	2,625	13.5%	430	1.9%
With three selected conditions	38	.20%	19	
With four selected conditions	0	0%	0	0%
No selected condition	7,155	36.7%	14,027	63.8%
<b>Total</b>	<b>19,479</b>	<b>100%</b>	<b>21,978</b>	<b>99.8%</b>

**Table 48 - Condition of Units**

Data Source: 2017-2021 ACS

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,266	6%	2,343	12%
1980-1999	4774	22%	4590	24%
1960-1979	5108	23%	6061	31%
Before 1960	10830	49%	6,485	33%
<b>Total</b>	<b>21,978</b>	<b>100%</b>	<b>19,479</b>	<b>100%</b>

**Table 49 – Year Unit Built**

Data Source: 2017-2021 ACS

**Risk of Lead-Based Paint Hazard**

<b>Risk of Lead-Based Paint Hazard</b>	<b>Owner-Occupied</b>		<b>Renter-Occupied</b>	
	<b>Number</b>	<b>%</b>	<b>Number</b>	<b>%</b>
Total Number of Units Built Before 1980	15,475	75%	12,335	67%
Housing Units build before 1980 with children present	2,960	14%	3,560	19%

**Table 50 – Risk of Lead-Based Paint**

**Data Source:** 2017-2021 ACS (Total Units), 2015-2019 CHAS (Units with Children present)

**Vacant Units**

The residential vacancy rate is an indicator of the balance between housing supply and demand in a community. When the demand for housing exceeds the available supply, the vacancy rate will be low. A low vacancy rate drives the cost of housing upward and serves as a disincentive for property owners to perform needed maintenance.

In a healthy market, the vacancy rate is usually 1% to 3% for single-family dwellings and 3% to 5% for multi-family dwellings. Pomona has one of the lowest vacancy rates of the surrounding cities. At 4.3 percent, Pomona's vacancy rate is about 2 percent below Los Angeles County. Of Pomona's vacant units, a large portion are vacant for unknown reasons, according to ACS data (48.8 percent). The table below shows that just under 20 percent of vacant units are up for rent and 24.5 percent are either on the market or have already been sold but are not yet occupied.

<b>Vacant Housing Units by Type</b>		
<b>Type of Household</b>	<b>Estimate</b>	<b>Percentage</b>
For rent	339	19.4%
Rented, not occupied	81	4.6%
For sale only	290	16.6%
Sold, not occupied	139	7.9%
For seasonal, recreational, or occasional use	47	2.7%
For migrant workers	0	0.0%
Other Vacant	853	48.8%
<b>Total Households</b>	<b>1,749</b>	<b>100%</b>
<i>Source: American Community Survey, 5-Years Estimates, 2019</i>		

**Table 51 – Vacant Housing Units by Type**

Among the vacant units in Pomona categorized as “other vacant” units includes abandoned and boarded up units. Acquisition and rehabilitation of deteriorated homes is an important City strategy for providing affordable housing opportunities and improving neighborhood conditions.

### **Physical Defects and Substandard Conditions**

According to American Community Survey, 5-Year Estimate, 2019 data almost 70% of the City housing stock being over forty (40) years old. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions. Through code enforcement programs, the City identified 134 units as in need of maintenance or some repair. Indications of substandard units include overcrowding, lack of complete plumbing, and the age of the housing stock. The figures for Pomona are 8.5% higher than the County overall. Based on 2019 ACS data, 1.5% of housing units in Pomona display substandard conditions. Approximately 0.4% of housing units lack complete plumbing facilities and 1.1% lack complete kitchen facilities. Based on this data, at a minimum 586 units (1.5%) within Pomona are substandard and in need of rehabilitation.

### **Need for Owner and Rental Rehabilitation**

Based on the City’s aging housing stock and the severity of housing problems, there is a need for owner and rental housing rehabilitation. The current distribution of the age of homes in Pomona also indicates that a majority of homes in the City were built prior to the 1990 Americans with Disabilities Act (ADA), which may result in a lack of accessible homes for those residents experiencing a disability. The City’s older housing stock also reflects a rapidly gaining need to rehabilitate housing to meet minimum livability and quality requirements, which is a barrier to many homeowners and residents in Pomona who have a lower income or a fixed income.

### **Estimate the # of Housing Units Occupied by LMI Families with Lead-Based Paint Hazards**

Based on American Community Survey data for 2019, the total number of units built before 1980 for owner-occupied units is 15,745 and 12,335 for renter units. Approximately 66% of those units are occupied by low-income persons. The estimated number of units with lead and occupied by low-income families is 18,555.



**MA-25 PUBLIC AND ASSISTED HOUSING -91.210(B)****1. Introduction**

There are no public housing units in the City of Pomona.

**Totals Number of Units**

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				XXX			0	0	0
# of accessible units									

**Table 52 – Total Number of Units by Program Type**

\* Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**2. Supply of Public Housing Development**

N/A - The City of Pomona does not have any public housing.

**3. Number and Physical Condition of Public Housing Units**

N/A - The City of Pomona does not have any public housing.

**4. Restoration and Revitalization Needs**

N/A - The City of Pomona does not have any public housing.

**5. Strategy for Improving the Living Environment of low- and moderate-income Families**

While the City does not have any public housing, the City has an assisted housing inventory to improve the lives of low-income families. Housing Element law requires that a jurisdiction address potential reductions in the affordable housing stock related to the conversion of assisted rental housing to market-rate housing within the next ten years. As of early 2022, there were fifteen assisted housing developments within Pomona, containing 1,077 assisted affordable units, or 2.6 percent of the City's housing units. Four of these developments, totaling twenty- one units, are ownership housing.

Project Name and Address	Tenant Type	Affordable Units	Total Units	Funding Source(s)
<b>Publicly Assisted Housing Projects</b>				
Portofino Villas	Senior	174	174	LIHTC
Emerson Village	Senior Disabled	164	165	Project-based Section 8
Drake Manor	Family	110	110	LIHTC
TELACU Las Brisas	Senior	80	80	HUD Section 202
TELACU La Esperanza	Senior	70	70	HUD Section 202 & HOME
St. Mark Taper Foundation Family Living Center (Prototypes Pomona Apartments)	Family	32	32	LIHTC
Mission Promenade	Family	6	8	RDA Set-Aside Funds
Tivoli Plaza Senior Apartments/Shield Village (Pomona Intergenerational Housing)	Senior	63	63	RDA Set-Aside Funds LIHTC
	Family	27	27	
Park & Plaza Apartments	Family, Senior	302	472	RDA Set-Aside Funds
Hamilton/Fernleaf Street	Family	8	8	RDA Set-Aside Funds
Palomares Walk	Family	4	8	RDA Set-Aside Funds
North Towne Avenue Apartments	Family	26	26	RDA Set-Aside Funds
Murchison Avenue	Family	1	1	RDA Set-Aside Funds
Edison Lofts	Family	4	14	RDA Set-Aside Funds
Pasadena St.	Family	6	6	RDA Set-Aside Funds
Total		1,077	1,219	

**Table 53 - Publicly Supported Housing (Inclusive of Local/State-Funded Projects)**

**Sources:**

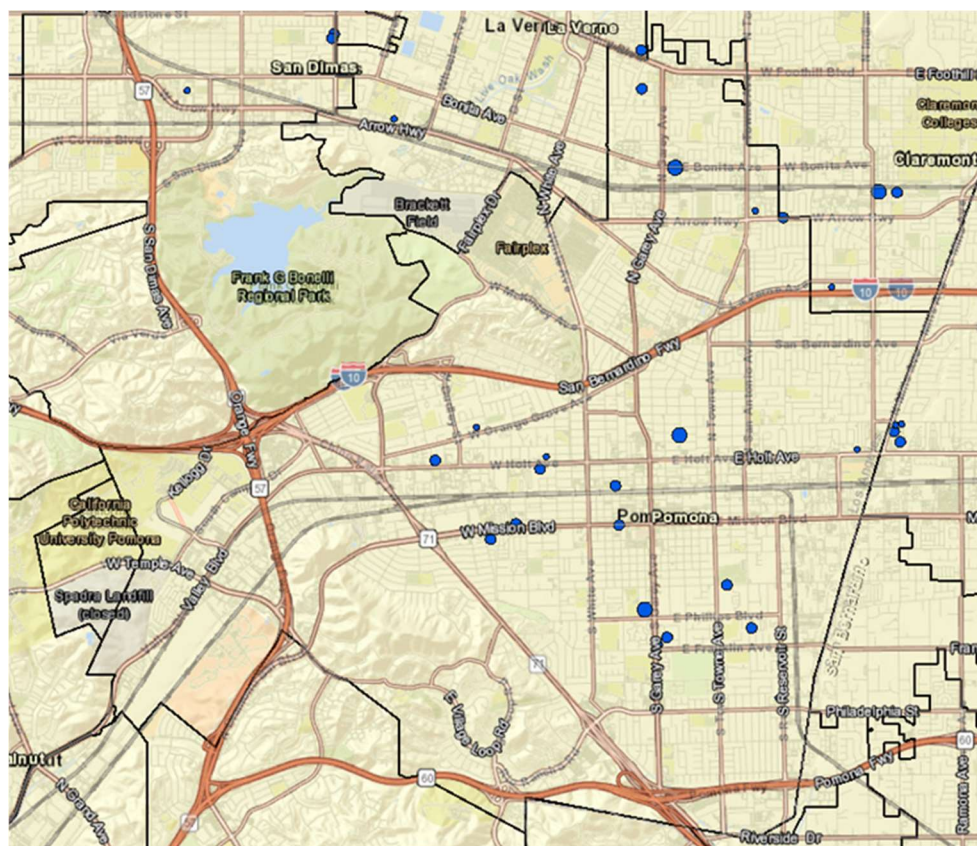
1. City of Pomona, Affirmatively Furthering Fair Housing 2021-2029

Tenant Type: S = Senior; F = Family; D = Disabled; V = Veteran; H = Homeless LIHTC: Low Income Tax Credits; HOME: HOME Investment

Partnerships Program; HUD 236: Preservation Program; HUD 202: Supportive Housing for Elderly Program; MHSA: Mental Health Services Act Program

**Preservation and Replacement Options**

To conserve assisted housing developments, the Emerson Village contract with HUD, which expired in July 2008, was renewed for an additional ten years, thereby preserving 164 affordable units. Of the 26 units at the North Towne Avenue Apartments, 14 units were restricted under the HOME program, and at the end of the HOME affordability period in December 2008, those units were converted to low/moderate- income units with four of the units remaining affordable to very low-income households.



Subsidized Housing (CHPC, 2023)

- Up to 50 Units
- 50 - 100 Units

Source: California Department of Housing and Community Development – AFFH Data Viewer

**MA-30 HOMELESS FACILITIES -91.210(c)****1. Facilities Targeted to Homeless Persons**

	<i>Organization</i>	<i>Population</i>	<i>Services</i>
Homeless Prevention	Catholic Charities	general	-
	House of Ruth	domestic violence	Temporary Rental Assistance program 120-days, 6 months and upto 12 months
	Department of Public Social Services	general	-
	City of Pomona HPRP Program	general	-
	Mercy House	general	-
	Foothill Aids Project	general	Temporary Rental Assistance program 120-days, 6 months and upto 12 months. They have about 20 units that can accomodate a family of 5
Outreach & Assessment	Pomona Homeless Assistance	general	-
	Pomona Homeless Outreach Team	general	-
	Tri City Mental Health	Mental health	
	Pacific Clinics	Mental health	
	Pomona Clinic Coalition	Physical & Mental health	
Emergency Shelter	House of Ruth	domestic violence	30 beds (2 single and the rest for families)
	Our House Shelter	families	18 beds
	LAHSA/Volunteers of America	Single Adults	100 Beds
	LAHSA/ESVCH	Single Adults	200 beds
	American Recovery	Sub. Abuse/ Adults w/Children Adults Only	3 beds 20 beds
	Inland Valley Hope Partners	Families w/children Single Women	15 beds 1 bed
		Adults with Children Adults	25 beds 25 beds

	Total Restoration Ministries	Chronically Homeless	25 beds
Motel Vouchers	American Red Cross	disaster	-
	Catholic Charities	general	-
	Department of Public Social Services	service applicants	-
	Pomona Neighborhood Center	general	-
	Services Center for Independent Living		
	Foothill Aids Project		-
	Pacific Lifeline	Women & children	-
Transitional Housing	American Recovery Treatment Center	substance abuse	10 beds
		Families w/children	15 beds
		Single Women	
	Crossroads - Women	reentry program	7 beds
	Fresh Start (Tri-City Mental Health)	mental health	40 beds
	House of Ruth – Women - Women w/ Children	domestic violence	20 beds
	Victory Outreach – (religious req.)	Men	68 beds
		Women	12 beds
	Prototypes – Women – Women w/ Children	substance abuse - transitional	65 beds
	Prototypes – Women – Women w/ Children	substance abuse - reentry program	48 beds
Transitional Housing	American Recovery Treatment Center	substance abuse	10 beds
		Families w/children	15 beds
		Single Women	
	Tri-City Mental Health	Adults w/ children	1 bed
		Adults Only	9 beds
		Chronically Homeless	3 beds
	Pomona Transitional Living Center - Men	disabilities	5 beds
	Tri-City Mental Health	Adults w/ children	1 bed
		Adults Only	9 beds
		Chronically Homeless	3 beds
Supportive Services	Catholic Charities	General	Housing, Finance & Counseling
	Department of Public Social Services	General	General

	House of Ruth	Domestic Violence	Case Management / Education
	LA Urban League	General	Employment
	Inland Valley Hope Partners	Families	Case Management /Childcare
	Pomona Neighborhood Center	General	General
	Family Resource Center	Youth	School Related
	Prototypes	Substance Abuse	Case Management /Counseling
	Inland Valley Hope Partners	Disabilities	Disability Assistance
	Tri-City Mental Health	Mental Health	Mental Health Services
	Pacific Clinics	Mental Health	Mental Health Services

**Source:** City of Pomona Consolidated Plan 2011-2018, The State of Homelessness In Pomona 2013

**Table 54 - Facilities and Housing Targeted to Homeless Households**

## 2. Mainstream Services

Services provided to stabilize qualifying households in housing may include:

1. Linkage to county, state and non-governmental mental health, medical, dental, substance abuse, entitlement income and benefits.
2. Assistance in understanding and completing applications for local assistance programs
3. Credit counseling and repair and budget management instruction
4. On-going case management
5. Moving costs - truck rental, moving company fee, temporary storage fees Rental application fees (common) Security Deposits (up to 2 mos. rent) Last month's rent to secure agreement Utility Deposits (common) Utility Payments (up to 24 mos., including up to 6 mos. arrearages, per service)
6. Rental assistance, housing search and placement assistance, legal assistance to the extent that it addresses situations that hinder client from maintaining permanent housing, mediation services.

### 1. List and describe services that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

Certain levels and types of assistance are identified as being particularly useful in helping special needs populations achieve and maintain housing stability. Some of these are as follows:

Chronically homeless persons may have become habituated to the street or institutionalized, either through the old continuum of care model, or in hospital or detention settings. In the struggle to survive, decision making is marked by a dominance of short term needs over long-term planning. Many chronically homeless persons and families have lost nearly everything and everyone of meaning; they may not trust that housing will still be there for them or that support systems can be relied upon. Those who have been homeless for extended periods may have lost basic homemaking, job and social skills.

For Chronically homeless individuals and households, high-tolerance housing, allowing for acclimatization and adaptation may be helpful. Others, who have been highly institutionalized, may respond better and feel more secure in a structured setting. Solid assessment, close case management, and development of individual

service plans in partnership with the client will help the service provider to identify and meet the unique needs of each client. The availability of life skills, job training and placement, and assistance in developing work based upon individual's skills, talents, and limitations will be helpful.

Families with children may additionally need family reunification support, childcare assistance and parenting classes. Ensuring that children are linked to the local school district homeless liaison and resource center is essential. Assisting families in knowing the rights to education access and maintenance will help to break a potential cycle of inter-generational homelessness.

Veterans and their families may require support in linking to the rich array of services and housing support available through the Veteran's Administration. Military personnel returning to the United States from recent deployment, may need additional counseling, medical and psychological services, and peer and community activities to help them reconnect with the friends and loved-ones on the home front.

Unaccompanied youth may need assistance connecting with Transitional Aged Youth service and housing providers. They may also need assistance with family reunification. Connection with adult school, community college, and job training and certification open doors for young people who have encountered a bend on the road of life.



**MA-35 SPECIAL NEEDS FACILITIES AND SERVICES -91.210(d)****1. Introduction**

Special needs or community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent this type of housing represent a fair housing concern.

According to the State of California Community Care Licensing Division of the State's Department of Social Services, there are 61 State-licensed community care facilities located in Pomona. The locations of these facilities are shown in the figure below. Pomona's care facilities are generally distributed throughout the City, however, visible concentrations are located in northern Pomona. These are not specifically located within R/ECAPs.

The table below summarizes the facilities by type and capacity. Pomona contains three types of licensed community care facilities: adult day care, adult residential care, and residential care for the elderly. These facilities have a total capacity for 410 persons in 24-hour care and 66 adults in day care programs. Four of these facilities, and 538 beds, are for elderly residential care. Given the size of the City's frail elderly population (75 years and above), specifically 6,664 persons or four percent of the overall population according to the 2021 5-Year ACS, this level of capacity can potentially be well below the need.

**Table 55 - Facilities by Facility Type**

Type of Facility	Description	Facilities	
		No.	Capacity
Adult Day Care	Day care programs for frail elderly or developmentally/mentally disabled adults	2	66
Adult Residential Care	Facilities that provide 24-hour non-medical care for disabled adults ages 18 through 59, who are unable to provide for their daily needs	55	410
Residential Care - Elderly	Provides care, supervision, and assistance with activities of daily living for persons older than 60 years of age	4	538
<b>Total</b>		<b>61</b>	<b>1,014</b>

**Source:** State of California Community Care Licensing Division, 2023

### **Housing Options for Persons with Disabilities**

In Pomona, a range of housing options with supportive services are available to persons with disabilities. The living arrangement of persons with disabilities depends on the severity of the disabilities. Many persons live at home in an independent arrangement or with other family members. To maintain independent living, persons living with disabilities may need assistance. This can include special housing design features to accommodate wheelchairs and persons with mobility limitations, income support for those not able to work, and in-home supportive services for persons with medical conditions among others. Services can be provided by public or private agencies.

Due to their specific housing needs, persons with disabilities are vulnerable to discrimination by landlords who may not be familiar with the reasonable accommodation protections contained in the Fair Housing Act. Similarly, some landlords may be hesitant to rent to persons with an assistive animal, such as a guide dog. Persons with more severe disabilities may require supportive housing. For those who may require additional care and supervision, licensed community care facilities offer special residential environments for persons with disabilities including physical, mental and emotional disabilities.

To help meet the needs of the disabled population, the City has a number of residential care facilities that provide supportive services to persons with disabilities. According to the California Department of Social Services, Community Care Licensing Division, there are 55 adult residential care facilities, with a capacity of 410 beds.

### **Supportive Housing and Special Needs Assessment**

Based upon community meetings and surveys, the top priority for the special needs populations were identified as seniors and the homeless. Reducing the number of unsheltered homeless was rated the top prior on the community needs survey. Special needs housing for seniors and persons with disabilities was ranked second in its category.

The City's Senior City also provides supportive housing services in coordination with Los Angeles County's Senior Services. These programs provide low-income elderly with options that allow them to live independently. Assistance with everyday

activities such as cleaning, cooking, transportation, etc. allow seniors and those with disabilities to maintain an independent lifestyle. Eighty-six units of subsidized senior housing are located in Pomona. Nine senior living apartment complexes are within the City of Pomona. Over 800 units are available to very-low, low- and moderate-income seniors through this network of senior housing. Emerson Village offers assisted living for the disabled. A new Centralized Service Center is being built to provide essential homeless services, including assistance with supportive housing referrals.

**2. Services to Ensure that Persons returning from mental and Physical Health receive appropriate supportive housing**

Services and advocacy are provided to persons with disabilities through the Services Center for Independent Living, the Department of Public Social Services, and the Regional Center. Casa Colina, one of the premier rehabilitation facilities in the country, is located in the City of Pomona. In addition to adult day care, Casa Colina has residential facilities available at alternate campuses for those disabled with brain injuries and developmental disabilities. The Adult Day Care Center of Pomona offers transportation and stimulating activities for disabled adults during daytime hours.

Residential facilities are offered for persons with drug and alcohol addictions at American Recovery Center. 173 units are available for individuals, as well as families with children. Prototype residential facilities and apartments will accommodate both homeless and housed low-income families with children that are working to overcome substance abuse. BRIDGES offers methadone treatment to those dealing with opiate addiction and mental health care combined with substance abuse treatment for those with dual-diagnosis.

The City of Pomona meets monthly with the Pomona Continuum of Care Coalition to assess needs for services and housing. The inter-agency connections developed through the Pomona COC has resulted in a highly responsive support and assistance network.

Homeless Prevention is provided by two local non-profit agencies that are funded with Emergency Solutions Grant funds making rental assistance, security deposits and utility payment assistance available to those at-risk of homelessness.

The City administers 1,124 Housing Choice Vouchers that provide permanent and housing options for at-risk, very-low and low-income families, homeless veterans.

The following housing options are available for special needs populations:

Agency	Special Need
Foothill Aids Project	HIV/AIDS
Tri-City Mental Health	Mental Health
First Step Housing	Mental Health
Pacific Lifeline	Domestic Violence
House of Ruth	Domestic Violence
Prototypes	Substance Abuse

**Table 56 – Housing Options for Special Needs Populations**

The following supportive services are available to assist those with special needs:

Agency	Services	Population Served
Catholic Charities	Housing, Finance, Counseling	All, low-income
Department of Public Social Services	Broad spectrum of services and housing	All, low-income
House of Ruth	Advocacy, counseling, legal, childcare, housing	Domestic Violence
Los Angeles Urban League	Employment	All
Pomona Crisis Center	Family Counseling, Court-ordered counseling	Violence and victims
Inland Valley Hope Partners	Food, clothing, psycho-social therapy, emergency housing for 90 days	Women, women with children
Family Resource Center	Resource assistance, advocacy	Families with school aged children
Prototypes	Childcare, counseling, case management	Women overcoming substance abuse who have children
Services Center for Independent Living	Advocacy	Persons with disabilities
Pomona Economic Opportunity Center	Employment	Undocumented workers
Tri City Mental Health Center	Housing, therapy, medications	Mental Health
Pacific Clinics	Therapy and medications	Mental Health

**Table 57 – Supportive Services for those with Special Needs**

**Specific Activities to be Undertaken By the City to Address Housing and Supportive Services Needed w/ Respect to Persons who are not homeless but have other special needs.**

See Appendix C: Summary of Annual Goals and Objectives for each activity in Appendices, which includes priority needs

**MA-40 BARRIERS TO AFFORDABLE HOUSING – 91.210(E)**

**1. Introduction**

Currently, the demand for affordable housing in Pomona exceeds the supply, especially for those in the extremely-low income, very-low and moderate-income categories. Barriers to affordable housing include:

- The reluctance of builders to invest in affordable housing projects, especially apartments.
- The lack of sufficient financial resources for development of affordable units.
- The overall relatively slow growth of income versus the rapid increase in population growth and relative increase in housing prices.

**Affordable Housing Strategies**

- Increase the supply of affordable housing through new construction
- Increase the supply of affordable housing through rental assistance
- Increase affordable housing opportunities through homebuyer assistance

**MA-45 NON-HOUSING COMMUNITY DEVELOPMENT ASSETS – 91.215(F)****1. Introduction****Economic Development Market Analysis**

Industry Sector	2010		2021		Percent Change 2010-2021
	People Employed	% of City Employment	People Employed	% of City Employment	
Agriculture, forestry, fishing and hunting, and mining	238		673		183.8%
Construction	5,120		6,504		27.0%
Manufacturing	10,855		7,978		-26.5%
Wholesale Trade	2,953		2,816		-4.6%
Retail Trade	7,728		8,990		16.3%
Transportation and warehousing, and utilities	4,782		6,216		30.0%
Information	989		642		-35.1%
Finance and insurance, and real estate and rental leasing	3,584		2,976		-17.0%
Professional, scientific, management, and administrative services	5,685		6,672		17.4%
Education services, health care, and social assistance	10,256		13,410		30.8%
Arts, entertainment, recreation, accommodation, and food services	5,347		6,616		23.7%
Other services (except public administration)	3,324		4,137		24.5%
Public Administration	1,730		2,212		27.9%
Total Employment	62,591		69,842		11.6%

*Data Source: ACS 2017-2021***Table 58 - Employment by Sector**

**Labor Force**

Total Population in the Civilian Labor Force	74,755
Civilian Employed Population 16 years and over	69,842
Unemployment Rate	6.6
Unemployment Rate for Ages 16-24	18.43
Unemployment Rate for Ages 25-65	4.97

**Table 59 – Labor Force**

Data Source: 2017-2021 ACS

Occupations by Sector	Number of People
Management, business, science, and arts	17,246
Natural resources, construction, and maintenance occupations	8,336
Service	13,930
Sales and office	14,949
Production, transportation and material moving	15,381

**Table 60 – Occupations by Sector**

Data Source: 2017-2021 ACS

**Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	32,922	52%
30-59 Minutes	19,841	31%
60 or More Minutes	10,792	17%
<b>Total</b>	<b>63,555</b>	<b>100%</b>

**Table 61 - Travel Time**

Data Source: 2017-2021 ACS

**Education Attainment by Employment Status (Population 16 and Older)****Education:**

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	1,954	15,344	No Data	No Data	No Data
9th to 12th grade, no diploma		11,754	No Data	No Data	No Data
High school graduate, GED, or alternative	6,082	23,364	14,939	23,308	11,809
Some college, no degree	8,940	20,970			
Associate's degree		7,090	3,597	5,804	3,334
Bachelor's degree	1,320	11,901			
Graduate or professional degree	No Data	5,414			

**Table 62 - Educational Attainment by Age**

Data Source: 2017 - 2021 ACS

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
Less than high school graduate	26,792
High school graduate (includes equivalency)	30,779
Some college or Associate's degree	36,729
Bachelor's degree	58,167
Graduate or professional degree	76,546

**Table 63 – Median Earnings in the Past 12 Months**

Data Source: 2017 - 2021 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

There are several major occupations of employed City residents that consist of production, administrative, and professional positions. These occupations were spread over a wide array of industries, with 18% of the working population in manufacturing, 15% in educational/health/social services and 12% in retail. In general, production and administrative positions, particularly those in the manufacturing, services and retail industries, earn lower incomes compared to professional occupations.

## **2. Workforce and Infrastructure Needs of the Business Community**

The City has faced many challenges due to the economic downturn in recent years. Job losses occurred which left the City's economy struggling. The largest percentages of the workforce in Pomona are: manufacturing, education/health services, retail trade and construction.

Needs of the business community include skilled and trained workers, as well as job opportunities. The gap between the skills of the local labor force and the expertise needed by the business environment is indicative of the number of workers (63,788) and the number of job (29,662) in the labor force, which represents and 46% gap/need.

Thus, the Los Angeles Urban League – Pomona Workforce Center through its WIA continues to increase its partnerships with agencies in the City to support the growth and stability of businesses.



**3. Major Changes that may have an economic impact (i.e. planned local or regional public or private sector investments or initiatives that have affected or may affect job or business support or infrastructure these changes may create**

With the loss of the City's Redevelopment Agency, planned local business investments are minimal. However, private investments/partnerships are encouraged. In some cases, the City may have available land and financing mechanisms to assist with economic ventures. Development efforts are aimed towards achieving goals to create, expand or retain business opportunities.

**4. How skills and education of the current workforce correspond to employment opportunities in the jurisdiction**

Lack of education and job skills directly correspond to employment opportunities, in that, those not trained or educated in a particular craft have difficulty finding employment.

The Los Angeles Urban League – Pomona Workforce Center, in Conjunction with Senate Bill 734 has been charged with spending 25- 30% of program allocations from LA County towards job placement and training activities over the course of the next two program years. This means the agency will be seeking employers who are willing to partner with in training and employing local residents.

Training Services in the City of Pomona may include:

1. Occupational skills training, including training for non-traditional employment
2. On-the-job training
3. Programs that combine workplace training with relation instruction, which may include cooperative education programs
4. Training programs operated by the private sector
5. Skill upgrading and retraining
6. Entrepreneurial training
7. Job readiness training
8. Adult education and literacy activities in conjunction with training services listed above

**5. Current Workforce Initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the Consolidated Plan**

In an effort to help individuals with gainful employment and to decrease school dropout rates, the LA Urban League implements several initiatives through the Los Angeles County Workforce Investment Act (WIA). Those initiatives include implementation of the following types of programs:

1. Adult and Dislocated Worker Programs
2. Youth Programs
3. Youth Employment Programs

These programs will support the Consolidated Plan through its goal to create, expand or retain economic opportunities. Specifically, they will aid in identifying and meeting the needs of key industry sectors/clusters. Key industry sectors identified by the WIB include the health care and life sciences, entertainment, logistics/transportation/goods movement, hospitality and tourism, and construction.

Also, the City will continue to fund public service activities geared towards youth programs and employment.

**6. Comprehensive Economic Development Strategy (CEDS)?**

The City does not formally participate in a Comprehensive Economic Development Strategy. However, the City does partner with the Chamber of Commerce and local businesses to encourage business retention, creation and/or expansion, as well as business assistance through the Small Business Administration.

**MA-50 NEEDS AND MARKET ANALYSIS DISCUSSION**

- 1. Are there any populations or households in areas or neighborhoods that are more affected by multiple housing problems?**

Minority populations, specifically Hispanic and African American households appear to be affected more by multiple housing problems. Lower-income households, female-headed households, rent-burdened households and overcrowded households and those households living in older housing stock are more affected by multiple housing problems.

- 2. Are there areas in the jurisdiction where these populations are concentrated?**

An area of racial/ethnic minority concentration is defined as a census tract that contains a minority population of fifty (50) percent or more. A review of the 2000 census data indicates that minority population groups now represent the majority of the population of the City and are dispersed throughout the community. In 2010 the City's population was estimated at 149,058 of which 87.5% belonged to a racial or minority group. At the census tract level, the majority of the population ranges from a low of 30.9% (4032.00) to a high of 97.2% (4024.05). In fact, census tract 4032.00 is the only census tract that had a minority population of less than 50%.

- 3. What are the characteristics of the market in these areas/neighborhoods?**

The severity of housing problems and needs of the extremely low- income, low-income, and moderate-income renters and owners in the City of Pomona are diverse and include, but are not limited to, housing affordability, overcrowding, substandard housing and availability of housing.

The Housing Market Analysis and Needs Assessment along with feedback from a Community Needs Survey/Consultation provided the basis for assigning the relative priority given to priority housing needs. The survey covered issues related to housing, public facilities, neighborhood needs, street improvements, public programs and quality of life priorities. The City received responses to a community survey identifying the top priority needs for housing as follows:

- Affordable Rental Housing
- Senior Housing/Special Needs Housing

- Homeownership Assistance

**4. Are there any community assets in these areas/neighborhoods?**

Community assets in these areas include improved infrastructure, improved community and recreational facilities, improved/rehabilitated housing, senior centers, public transportation, grocery stores, drug stores and community health centers/hospitals.

**5. Are there other strategic opportunities in any of these areas?**

There are strategic opportunities for development, as well as the job creation. While public funding at the State and Local level may be limited, private investment opportunities still exist. The City acquired land from the now defunct Redevelopment Agency which creates strategic opportunities for development partnerships.

**MA-60 BROADBAND NEEDS OF HOUSING**

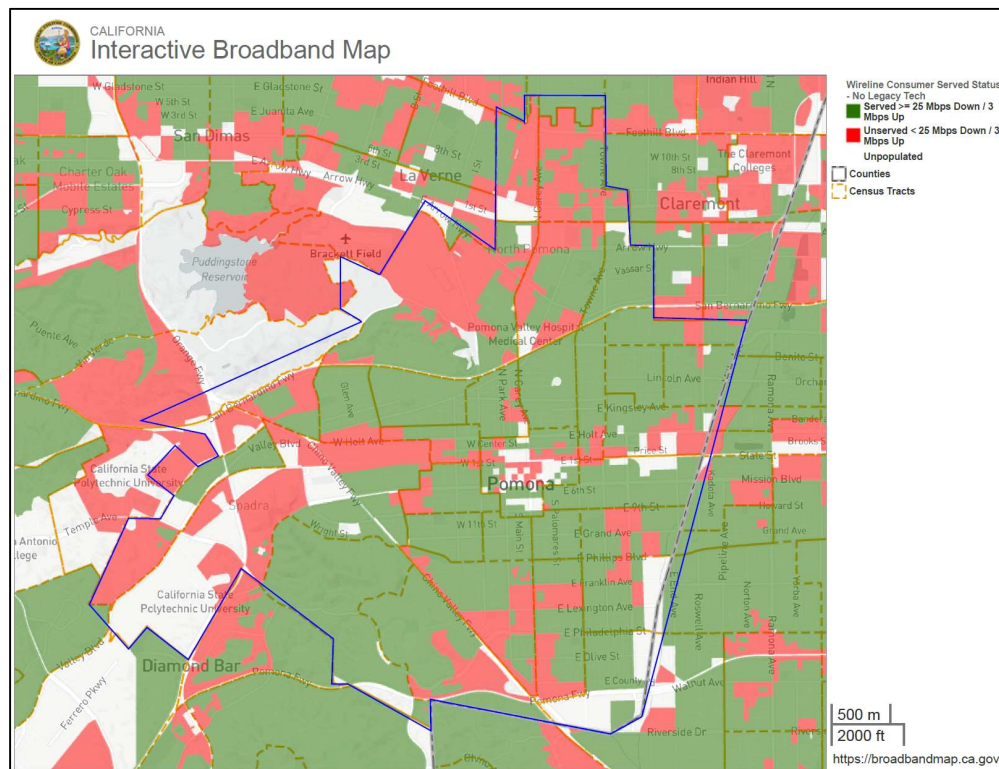
**1. Describe the need for broadband wiring and connection for households, including low-and-moderate-income households and neighborhoods.**

In 2015 the Federal Communications Commission (FCC) defined broadband internet as a minimum of 25 Mbps download and 3 Mbps upload (25/3 Mbps). The FCC's 2018 "Measuring Broadband America" report found that among participating home internet service providers, the median download speed experienced by users was approximately 72 Mbps. This is an indication that Americans have already surpassed the minimum standards.

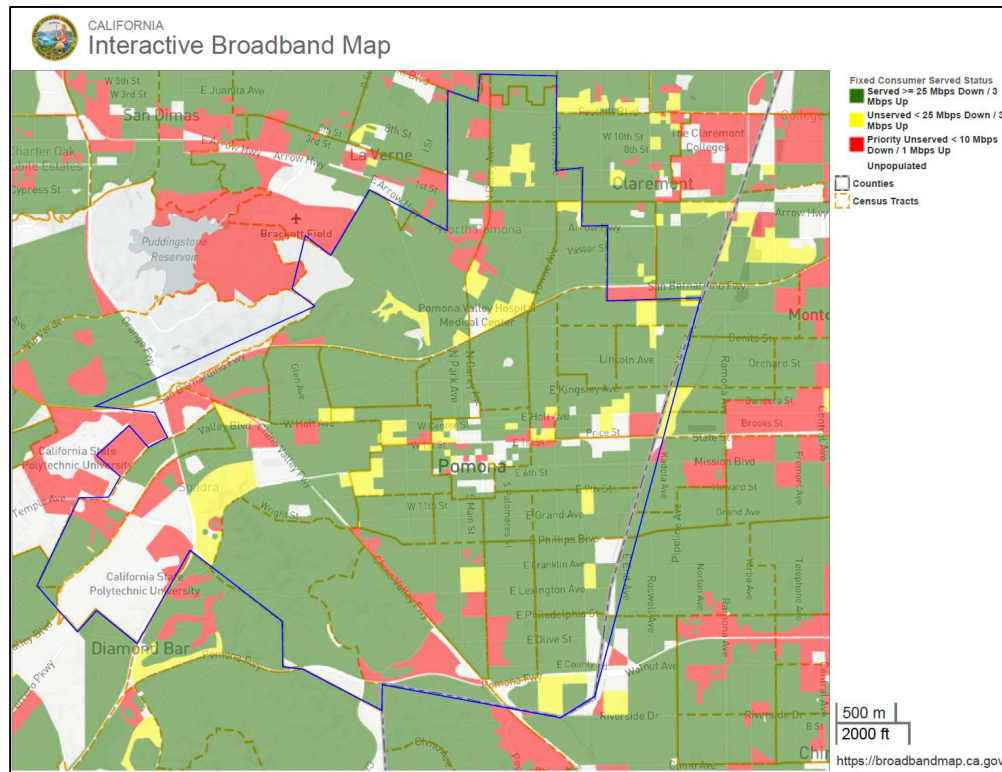
According to the 2020 Interactive Broadband Map, over 3/4ths of the residential and commercial areas of Pomona receive broadband internet greater than the minimum of 25 Mbps download and 3 Mbps upload (25/3 Mbps). This included both wireline broadband and wireless service. Based on the Fixed Consumer Served Status Map that are "Priority Unserved". This shows areas where broadband service is not available above 10 Mbps download and 1 Mbps upload. This is in small areas of the following Census Tracts, 402702, 402902, 4030, 402402, and 4022. In lieu of lack of service for community members in these areas, the City of Pomona provides free access to personal computing workstations and internet at the Children and Adult Reference areas of the Library.

**2. Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

An increase in competition among internet providers will improve the quality of services. This includes availability of internet access and speeds, and affordable options for broadband. The City of Pomona has three wireline providers who cover over 95% of the city, Spectrum, T-Mobile, and Frontier. Furthermore, the city has four wireless service providers, Verizon, T-Mobile, Sprint, and AT&T. According to the CA Interactive Broadband Map wireline and wireless provide nearly universal coverage of all residential and commercial areas of Pomona. This shows that diversified internet service provider options can be made available for lower-income households as well in a more competitive market.



Data Source: CA Interactive Broadband Map, Wireline Consumer Served Status



Data Source: CA Interactive Broadband Map, Fixed Consumer Served Status

## MA-65 HAZARD MITIGATION

### 1. Describe the Jurisdictions increased natural risks associated with climate change.

The average temperatures in Pomona range from 41 degrees in the winter months to 89 degrees in the summer months. This may vary during the months of October to March due to the Santa Ana winds causing higher temperatures and very low humidity. Additionally, rainfall in the city averages 16.99 inches of rain per year.

The City of Pomona Local Hazard Mitigation Plan (LHMP) Update for 2022-2027 was approved by City Council on March 30, 2022. The LHMP identifies earthquakes as the highest local hazard threat. Pomona is located in a seismically active region of Southern California, with the surrounding local faults: San Jose, Indian Hill, Chino, and Central Avenue Faults. Less destructive hazard threats include landslides, wildfires, and windstorms. The areas that are prone to wildfires are located in the southern western corner of the City, in Phillips Ranch, and Cal Poly Pomona. Although, the risk of wildfires is high in the San Gabriel Mountains region, the city is isolated from this fire prone area and the probability of a wildfire spreading to Pomona is low.

Climate change is not identified as a hazard in the updated LHMP, but it has the potential to impact all of the listed hazards: earthquakes, landslides, wildfire, flooding, windstorm, and pandemics/infectious disease.

**2. Describe the vulnerability to these risks of housing occupied by low-and moderate-income households based on an analysis of data, findings, and methods.**

Local hazards (earthquakes, landslide, wildfire, flooding, windstorm, and pandemics/infectious disease) are city wide and have the potential to greatly affect the commercial and residential areas. Particularly, low-and moderate-income residents are vulnerable to the risk of natural hazards.

In 2021 the median household income in the City of Pomona was \$70,494. Additionally, approximately 66 percent of residents below the counties 80% median family income (MFI), and 4,067 families and 24,197 individuals live below poverty level are 23.2%. LMI residents will experience a financial impact with fewer economic resources to respond to a disaster without the assistance of their local, state, or federal government. While the City of Pomona's updated LHMP does not discuss the vulnerability of LMI households, Federal Emergency Management Agency's (FEMA) Office of Equal Rights addresses this need by suggesting that agencies and organizations planning for natural disasters identify special needs populations, make recovery centers more accessible, and review practices and procedures to remedy any discrimination in relief application or assistance. The jurisdiction's increased natural hazard risks associated with climate change.



## V. STRATEGIC PLAN

### SP-05 Overview

#### Introduction

This Strategic Plan is part of the City of Pomona's Consolidated Plan and Annual Action Plan covering fiscal years 2023-2028. The City of Pomona has established the following strategies/objectives to meet priority housing and community development needs. All strategies/objectives coincide with HUD's goals to:

- Ensure Decent Housing
- Create a Suitable Living Environment
- Expand Economic Opportunities And objectives to:
  - Provide Availability/Accessibility to programs and services
  - Provide Affordability to housing, programs and services
  - Create Sustainability in the Community through combined efforts of programs and services

#### Priority Needs

The City has identified ten priority needs areas to meet housing and community development goals. Priorities are based in part on responses to the 2023 Community Needs Survey and the Fair Housing Survey conducted as part of citizen participation outreach efforts, including information gathered in specific focus groups, and interviews with various organizations and service providers in the housing and community development field. The City will CDBG, HOME, ESG, and other resources to address needs in the following priority areas:

1. Housing
2. Homelessness
3. Special Needs/Non-Homeless
4. Anti-Crime
5. Economic Development
6. Infrastructure and Public Facilities Improvements
7. Public Services
8. Fair Housing
9. Code Enforcement
10. Housing Services



The 2023-2028 Consolidated Plan strategies coincide with HUD's goals to: 1) ensure decent housing; 2) create a suitable living environment; and 3) expand economic opportunities. It further outlines the City's planned goals, outcomes and objectives to meet priority needs. A summary of the City's specific goals, objectives and outcomes are:

### **Goals**

Goal 1: Promote Fair Housing Opportunity

Goal 2: Expand Affordable Housing Supply

Goal 3: Create and Preserve Affordable Housing

Goal 4: Support Homeless Services Activities

Goal 5: Planning and Program Administration

Goal 6: Neighborhood Preservation and Eliminate Blighted Conditions

Goal 7: Support Activities that Assist with Basic Needs and Provide Quality Services

Goal 8: Improve Infrastructure and Public Facilities

Goal 9: Expand Economic Opportunities/Employment Training

### **Housing Strategies**

- Preserve the City's existing affordable and moderate housing stock through housing rehabilitation programs
- Preserve at-risk housing stock and prevent slum/blight through Mobile Home Rehabilitation
- Preserve the City's affordable rental housing stock through multi-family housing rehabilitation
- Increase affordable housing opportunities by assisting Community Housing Development Organizations (CHDOs)
- Increase affordable housing opportunities for low-to-moderate income first-time homebuyers
- Increase affordable rental housing opportunities through Housing Choice Voucher Rental Assistance (Formerly Known as Section 8)
- Increase affordable rental housing through HOME-funded Tenant- Based Rental Assistance
- Increase the supply of affordable housing through acquisition, rehabilitation and/or resale.
- Conduct proactive code enforcement in targeted areas to blighted conditions

- Reduce the number of housing units with lead-based paint hazards through education, testing and remediation
- Improve access to housing information through housing counseling services

**Homeless Strategies**

- Strengthen the Continuum of Care by addressing gaps in residential and non-residential services
- Implement a plan of homeless prevention
- Increase essential services to the homeless prevention
- Develop and implement a Homeless Management Information System
- Develop and implement a Strategic Plan to end homelessness
- Improve access to service and information and increase levels of referrals

**Non-Homeless/Special Needs Strategies**

- Collaborate with agencies in the Continuum of Care, Community- Based Organizations, L.A. County and City Departments to address gaps in services for non-homeless and special needs population.

**Lead-Based Paint Hazards Strategies**

- Reduce the number of housing units with lead-based paint hazards through education, testing and remediation
- Apply for additional funding through lead grant programs to assist with lead remediation within the City.

**Fair Housing Strategies**

- Partner with Community Development Housing Organization to develop affordable housing
- Provide loans to low-income families for access to affordable homeownership and housing rehabilitation opportunities.
- Provide fair housing education, outreach and services to community residents and stakeholders.
- Partner with lenders/financial institutions that have a history of providing funding opportunities to low-income persons and minority concentration areas.

**Community Development Strategies**

- Improve overall infrastructure of low-to-moderate income neighborhoods
- Improve recreational and community facilities located in low-to- moderate income neighborhoods

- Improve ADA accessibility throughout the City
- Improve access to public services for special needs population (youth and families)
- Improve access to health care for at-risk households
- Improve the quality of life and mobility for the senior population
- Improve public safety through crime prevention oriented policing

**Economic Development Strategies**

- Provide funds to organizations that will create, retain or expand job opportunities to low-to-moderate income persons

**SP-10 GEOGRAPHIC PRIORITIES – 91.215(A)(1)**

Area Name: Citywide

Area Type: Metropolitan City of Pomona

Neighborhood Boundaries: Not applicable, priorities will be Citywide based on CDBG-eligible area or low to moderate income clientele

Specific Housing and Commercial Characteristics of Target Area: N/A

How did consultation and citizen participation process help identify this neighborhood as a target area: N/A

Identify needs in target area: N/A

What are the opportunities for improvement in this target area: N/A

Are there barriers to improvement in this target area: N/A

**General Allocation Priorities**

Except for Code Enforcement activities which are conducted in targeted CDBG-eligible areas, projects will be done throughout the City. Eligibility of projects or activities will be based on either low-mod qualifying area or income qualification of the household.

**Code Enforcement**

CDBG regulations require that code enforcement activities be conducted in established target areas and that code enforcement is part of a strategic effort involving a variety of actions, which will work to improve the identified neighborhoods and arrest blighted conditions.

In addition to inspections for code violations, the City's code enforcement program compliments a variety of actions or public and private improvements aimed at arresting blighted/deteriorated areas. Such improvements include the following:

- Housing Rehabilitation
- Infrastructure Improvements

- Public Parks/Facilities Improvement

**Target Areas**

The following indicators are used in developing targeted areas for CDBG-funded code enforcement:

1. CDBG-Eligible Areas
2. Deteriorated Areas
3. Primarily residential

**SP-25 PRIORITY NEEDS – 91.215(A)(2)**

HUD defines priority needs levels as follows:

H = High Priority

M = Medium Priority

L = Low Priority

N = Not a Priority

High Priority: Activities to address high priority needs will be funded by the City during the five-(5) year Consolidated Plan Period.

Medium Priority: If funds are available, activities to address these priority needs may be funded by the City during the five-(5) year period. If Federal HUD funds are limited, the City may use other sources of funds as resource leveraging.

Low Priority: It is not likely that the City will fund activities to address these priority needs during the five-(5) year period. The City will consider certifications of consistency for other entities' applications of Federal assistance.

No Such Need: The City finds that there is no such need or the City shows that this need is already substantially addressed. No certifications of consistency will be considered.

**General priorities for investment, identified as priority need levels (High, Medium, Low, and No Such Need) are identified in Appendix C: Summary of Specific Annual Goals and Objectives, for each proposed activity**

**SP-30 INFLUENCE OF MARKET CONDITIONS – 91.215(B)****Influence of Market Conditions**

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	Housing Cost Burden
TBRA for Non-Homeless Special Needs	Housing Cost Burden
New Unit Production	Housing Cost Burden
Rehabilitation	Housing Cost Burden
Acquisition, including preservation	Affordability

**Table 65 – Influence of Market Conditions****Cost Burden**

Cost burden is an important housing issue because paying a high proportion of one's income for housing leaves less money available for other basic necessities, such as food and health care. Housing cost burden is typically linked to household income. Generally, the proportion of a household's income dedicated to housing costs increases as overall income decreases. State and federal standards specify that a household experiences a housing cost burden if it pays 30 percent or more of its gross income on housing. A severe housing cost burden is when a household pays 50 percent or more of its gross income on housing.

**SP-35 ANTICIPATED RESOURCES – 91.215(A)(4)**

The FY 2023-24 formula entitlement allocations are estimated as follows:

<b>2023-24 ENTITLEMENT ALLOCATIONS &amp; REALLOCATED FUNDS</b>	<b>AMOUNT</b>
Community Development Block Grant (CDBG)	\$1,771,564
HOME Investment Partnerships	\$905,134
Emergency Solutions Grant (ESG) programs	\$159,204
<b>ENTITLEMENT ALLOCATIONS TOTAL</b>	<b>\$2,835,902</b>
FY 2022-23 CDBG Program Income	\$0
FY 2022-23 HOME Program Income	\$0
FY 2022-23 HOME Carryover/Reprogrammed Funds	\$0
FY 2022-23 ESG Carryover/Reprogrammed Funds	\$0
<b>TOTAL</b>	<b>\$0</b>

**Table 66 – Anticipated Resources**

**Use of Funds and expected outcomes are identified in Appendix C: Summary of Specific Annual Goals and Objectives, for each proposed activity.**

### **Resource Leveraging**

In addition to the resources indicated above, the City uses a variety of federal, state, local and private resources to achieve housing and community development goals. The following represents other resources that support key programs:

- CARES Act Stimulus Funds
- HOME-American Rescue Plan (ARP) Funds
- Federal Lead Hazard Control Grant Funds
- General Funds
- Gas Tax Funds
- Housing Choice Vouchers
- Continuum of Care
- Housing Successor Agency Bond Funds
- Park and Recreation Bond Funds



CARES ACT (COVID-19) STIMULUS FUNDING

On March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act or the "CARES Act". The Act identified additional funding for the Emergency Solutions Grant (ESG) Program and the Community Development Block Grant (CDBG) program to support preparation for and response to the community impacts of the COVID-19 pandemic. HUD's distribution plan for the additional funding included multiple phases: an initial phase that would allow for quick access to funding necessary to address the immediate crisis resulting from the rising pandemic, as well as later phases that would support post-pandemic community recovery.

HOME-AMERICAN RESCUE PLAN (HOME) ARP

On March 11, 2021, Congress approved a \$1.5 trillion American Rescue Plan (ARP). This plan contains \$5 billion for affordable rental housing and homeless assistance through the Home American Rescue Plan (HOME-ARP). Approximately \$197 million in HOME-ARP funds was allocated to thirty cities in Los Angeles County. These formula block grant funds, provide cities with flexible funding to reach populations experiencing homelessness, or those currently at risk of homelessness and address local affordable housing, non-congregate shelter, and supportive service needs within respective communities.

These funds are not the traditional HOME Program funds, but are also administered through the HUD and intended to address homelessness. Eligible uses of HOME-ARP funds include the following activities:

1. Administration and Planning;
2. Development and Support of Affordable Rental Housing;
3. Tenant-Based Rental Assistance;
4. Supportive Services for Qualifying Populations; and
5. Acquisition and Development of Non-Congregate Shelter (NCS)

LEAD HAZARD CONTROL AND HEALTHY HOMES

The Lead Hazard Control and Healthy Homes program is designed to eliminate lead based paint hazards in privately owned housing that were constructed prior to 1978, giving preference to units with children aged 6 years and below. In conjunction with lead, it further aims to minimize other risks to health and safety to housing occupants such as falls, carbon monoxide poisoning, pests, and entry by intruders. Additionally, these funds will be used to implement the City's Lead Education Awareness Control and Healthy Homes Program (LEAC+HH).

General Funds

The General Operating fund of the City used to account for all the general revenue of the City not specifically levied or collected for other City funds. Major revenue sources included property taxes, utility users and sales taxes, and motor vehicle in-lieu fees.

Gas Tax Funds

The State Gas Tax is revenue received by the City from the State of California. These funds include Gas Tax revenues under sections 2106 and 2107 of the Street and Highway Code, which can be used for either street maintenance or construction.

**Matching Fund Requirements**HOME Match

Federal regulations require a 25% match for the HOME Program. The City does not provide match to HOME funds due to match contribution from the State.

ESG Match

Federal regulations require a 100% match for ESG funds. The City will ensure that there is a 100% match to the ESG entitlement grant. Agencies awarded ESG funding provide the expected source of match, amount and term of availability in their proposals. The City monitors the match during annual site program and fiscal monitoring. Agencies provide match that is cash or soft-match and that is not underfunded under Subtitle B.

**Publicly-Owned Land or Property in City Used to Address Needs**

Not applicable.

**SP-40 INSTITUTIONAL DELIVERY STRUCTURE - 91.215(k)**

The City has an inclusive institutional structure approach that uses a variety of organizations and departments within the City to carry out its housing, homeless, and community development plan. The City continues to streamline and to make improvements to the delivery system to best serve the community through activities and services. As the needs of low-to-moderate income residents change, the demand for types of services and programs will also change. This may result in future revisions to the Consolidated Plan through amendments and substantial amendments, as necessary.

The City continues to coordinate with non-profit providers, community and faith-based organizations, public institutions, and City Departments in the development of the Consolidated Plan.

<b>Responsible Entity</b>	<b>Responsible Entity Type</b>	<b>Role</b>	<b>Geographic Area Served</b>
City of Pomona	Local Government	Grants Administration	City of Pomona

**Table 67 - Institutional Delivery Structure**

	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Homeless Prevention</b>	Catholic Charities House of Ruth	General Domestic Violence	- -Temporary Rental Assistance program 120-days, 6 months, and up-to 12 months
	Department of Public Social Services	General	-
	City of Pomona HPRP Program	General	-
	Mercy House	General	-
	Foothill Aids Project	General	-Temporary Rental Assistance Program 120-days, 6 months and up-to 12 months. They have about 20 units that can accommodate a family of 5.

	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Outreach &amp; Assessment</b>	Pomona Homeless Assistance	General	-
	Pomona Homeless Outreach Team	General	-
	Tri City Mental Health	Mental Health	-
	Pacific Clinics	Mental Health	-
	Pomona Coalition Clinics	Physical & Mental Health	
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Emergency Shelter</b>	House of Ruth	Domestic Violence	30 beds (2 single and rest for families)
			5 beds
	Our House Shelter	Families	18 beds
	LAHSA/Volunteers of America	Single Adults	100 beds
	LAHSA/ESVCH	Families	200 beds
	American Recovery	Sub. Abuse/Adults w/Children	3 beds
		Adults Only	20 beds
	Inland Valley Hope Partners	Families w/Children	15 beds
		Single Woman	1 bed
	Total Restoration Ministries	Adults w/Children	25 beds
		Adults	25 beds
		Chronically Homeless	25 beds
	San Gabriel Valley Center	Families w/Children	14 beds
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Meal Vouchers</b>	American Red Cross	Disaster	-
	Catholic Charities	General	-
	Department of Public Social Services	Service Applicants	-
	Pomona Neighborhood Center	General	-
	Services Center for Independent Living		-
	Foothill Aids		-
	Pacific Lifeline	Women & Children	-
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Transitional Housing</b>	American Recovery Treatment Center	Substance Abuse	
		Families w/Children	10 beds
		Single Women	15 beds
	Crossroads – Woman	Reentry Program	7 beds
	Fresh Start (Tri-City Mental Health)	Mental Health	40 beds
	House of Ruth – Women – Women w/Children	Domestic Violence	20 beds
	Victory Outreach – (Religious Req.)	Men	68 beds
		Women	12 beds
	Prototypes – Women – Women w/Children	Substance Abuse – Transitional	65 beds
	Prototypes – Women – Women w/Children	Substance Abuse – Reentry Program	48 beds
	Tri-City Mental Health	Adults w/Children	1 bed
		Adults Only	9 beds
		Chronically Homeless	3 beds

	Pomona Transitional Living Center – Men	Disabilities	5 beds
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Permanent Supportive Housing</b>	Prototypes	Substance Abuse – Women w/Children	50 beds
	Foothill Aids Project	HIV/AIDS – Shelter Plus	56 beds
	Tri City Mental Health	First Step Housing	14 beds
	First Step Housing	First Step Housing	20 beds
	First Step Housing	First Step Housing	15 Beds
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Permanent Housing</b>	City of Pomona – Housing Authority	Housing Choice	894 Vouchers
	City of Pomona – Family Self Sufficiency	Section 8	115 Program Spaces
	<b>Organization</b>	<b>Population</b>	<b>Services</b>
<b>Supportive Services</b>	Catholic Charities	General	Housing, finance, & counseling
	Department of Public Social Services	General	General Case Management/
	House of Ruth	Domestic Violence	Education
	LA Urban League	General	Employment Case Management/
	Inland Valley Hope Partners	Families	Child Care
	Pomona Neighborhood Center	General	General
	Family Resource Center	Youth	School Related Case Management/
	Prototypes	Substance Abuse	Counseling Disability
	Inland Valley Hope Partners	Disabilities	Assistance Mental Health
	Tri Cities Mental Health	Mental Health	Services
	Pacific Clinics	Mental Health	Mental Health Services

Source: City of Pomona Housing Element; The State of Homelessness in Pomona Report 2013

**Table 68 - Continuum of Care Community Resources**

**How Service Delivery System, including services listed in Homeless Prevention Services Summary Table meet the needs of homeless persons**

On a local level, the City of Pomona meets monthly with the Pomona Continuum of Care Coalition (COC) to assess service and housing needs. The COC responds to immediate needs and crises within the homeless population. This intensive interaction has resulted in a highly responsive support and assistance network. Within the context of the large Los Angeles County Continuum of Care, the Pomona Continuum of Care Coalition has been built upon the HUD continuum model: homeless prevention, outreach and assessment, emergency shelters and services, transitional housing and transition planning for homeless persons moving from shelters and transitional housing to permanent housing.

The City of Pomona, the CONSORTIUM, and the COC address the full range of Continuum of Care activities including outreach, supportive services, emergency, transitional and permanent housing and homeless prevention. Because of the vast size of the Los Angeles County COC, which encompasses eighty-eight cities, and the location of Pomona in the outlying east end of the COC, Pomona has also created its own local continuum consisting of forty agencies that fulfill all the activities of a comprehensive continuum at a local level in order to be efficient and responsive to the needs of the homeless and at-risk within the community.

**Strengths and Gaps in Service Delivery System for Special Needs Population and Persons experiencing homelessness.**

The following are potential gaps in the institutional structure that will be approached over the next five (5) year period:

- Because of the high cost of production and construction, look for additional ways to develop units;
- Identify need for housing resources available to individuals and households whose needs may not be met within the current program framework; Look at the needs of the senior population and plan for future services;
- Look at the needs of youth and family populations and plan for future programs and services that coincide with the City of Pomona Youth and Family Master Plan.

**Strategy for Overcoming Gaps**

### Integrated Approach/Vision and Regional Connections

The City has integrated several required programs and plans with its Consolidated Plan to ensure that all aspects of City government and related agencies (e.g., non-profit providers) work together on a uniform vision for the benefit of the residents of the City of Pomona. Programs and activities funded reflect goals and objectives that are contained in these plans. Some of these plans and programs are as follows: the Housing Element, the Youth and Family Master Plan, Capital Improvements Plans and others. These plans have been created with input from the public, other City departments and divisions, the County of Los Angeles, LAHSA and other agencies and non-profit providers.

In addition, resources and programs are coordinated through the Continuum of Care and through regional work with non-profit organizations that provide activities to assist the homeless, those at risk of homelessness and others within the community, as detailed in the Consolidated Plan section on homelessness and the Continuum.

### Organizational Structure

The City Council is responsible for funding award, policy creation, and oversight of the programs. City staff is responsible for draft funding allocations and geographic distribution of the City's CDBG and other housing funds, management of the CDBG budget, administration of CDBG Programs, administration of HOME-funded activities and administration of ESG-funded activities, administration of RDA Set-Aside funds and development, implementation and/or monitoring of other housing programs, including residential rehabilitation and home buyer opportunities. The majority of staff responsible for implementation of CDBG, HOME and ESG Programs are in the Housing Division of the Planning and Housing Department and include: CDBG Administration, HOME Administration and Homeless Programs.

These units have a single Housing Manager to help coordinate efforts between the units and with other divisions and departments within the City.

Continuum of Care

The City of Pomona participates in the Continuum of Care and relies on non-profit providers to provide services. In 2002, the City also participated in a joint project with neighboring communities in order to conduct a count of homeless in the region and collaborates on a number of regional approaches. These interactions are coordinated by the City's Homeless Coordinator vis-à-vis the City.



**SP-45 GOALS SUMMARY – 91.215 (A)(4)****Goal Summary Information**

Goal summary information, including needs to be addressed and priority need level and descriptions are identified in Appendix C: Summary of Specific Annual Goals and Objectives, for each proposed activity.

**Estimate the number of extremely low-income, low-income and moderate-income families to whom the City will provide affordable housing as defined by HOME.**

Information on affordable goals and the number of low-income households to be served, are identified the Appendices in the: Summary of Specific Annual Goals and Objectives, for each proposed activity. The City will update this table each year in the Annual Action Plan to reflect annual goals and in the CAPER to reflect program accomplishments.

**SP-50 PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215 (c)**

The City of Pomona does not have Public Housing.

**SP-55 BARRIERS TO AFFORDABLE HOUSING**

Currently, the demand for affordable housing in Pomona exceeds the supply, especially for those in the extremely-low income, very-low and moderate-income categories.

Barriers to affordable housing include:

1. The reluctance of builders to invest in affordable housing projects, especially apartments.
2. The lack of sufficient financial resources for development of affordable units.
3. The overall relatively slow growth of income versus the rapid increase in population growth and relative increase in housing prices.

**Strategy to Remove or Ameliorate the Barriers to Affordable Housing Affordable Housing Strategies**

- Increase the supply of affordable housing through new construction

- Increase the supply of affordable housing through rental assistance
- Increase affordable housing opportunities through homebuyer assistance
- Increase awareness and educate public on fair housing and barriers to fair housing

As a recipient of CDBG funds, the City of Pomona is required to develop a fair housing program whose specific actions and procedures which will have an impact on preventing, reducing or eliminating housing discrimination and other barriers to equal housing choice based on race, color, religion, sex, national origin, ancestry, familial status or physical or mental handicap.

### **Assessment of Fair Housing**

To ensure consistency with the policies and programs recommended by the Consolidated Plan and to ensure continued compliance with the Fair Housing Certification found at 24 CFR 91.225 (a)(1), the City contracted with a consultant to prepare the City's Assessment to Fair Housing (AFH). The AFH was approved by HCD in September 2022. A highlight of AFH goals are below:

1. To expand affordable housing supply citywide to create balanced, diversified and livable neighborhoods.
2. To preserve and improve existing affordable housing and neighborhood conditions.
3. To improve fair housing conditions by expanding education and outreach activities and by implementing strategies to investigate complaints and enforcement procedures.
4. To improve financial literacy and access of financing for homeownership and improvement.
5. To improve mobility and opportunities for Housing Choice Voucher participants, Project-Based Voucher participants, and publicly supported housing residents.
6. To provide for additional accessible multifamily and single-family units for individuals with disabilities.

### **Fair Housing Strategies**

The City will undertake the following strategies in keeping with goals identified in the AFH:

- Partner with Community Development Housing Organization to develop affordable housing
- Provide loans to low-income families for access to homeownership and housing rehabilitation opportunities.
- Provide fair housing education, outreach and services to community residents and stakeholders.
- Partner with lenders/financial institutions that have a history of providing funding opportunities to low-income persons and minority concentration areas.

#### **SP-60 HOMELESSNESS STRATEGY – 91.215 (D) OUTREACH TO HOMELESS PERSONS**

Outreach and Assessment is provided through the Pomona Homeless Assistance Program and the Pomona Homeless Outreach Team. These programs are funded with Emergency Solutions Grant and COC Program funds and are administered by the City. Several of the local non-profits also have outreach teams specific to the field of endeavor (mental health, substance abuse, HIV/AIDS, etc.).

#### **Addressing the Emergency and Transitional Housing Needs of Homeless Persons**

The City funds a Winter Shelter Program and provides additional funding to service providers to assist with emergency shelter. All programs funded by the City are required to assist clients in developing individual service plans and transition plans before exiting the program.

The City conducted a community process for addressing the needs of persons experiencing homelessness in the City of Pomona. After conducting a summit and on-going meetings of the ad hoc Homeless Advisory Committee, the City concluded that a year-round shelter that serves the broadest homeless population was a high priority need. Hope for Home (H4H) opened in December 2018 and is operated by Volunteers of America Los Angeles (VOALA). The opening of the shelter has assisted with the success of moving individuals from a crisis or transitional housing and into a permanent placement.

**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.**

December 4, 2015, HUD adopted the final rule defining homelessness. A “chronically homeless” individual is a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institution. The individual also must have been living as described continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

Chronically homeless families are families with adult heads of household who meet the definition of a chronically homeless individual. If there is no adult in the family, the family would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

Addressing comprehensive layered solutions to chronic homelessness, the City has developed and maintains a complete continuum of care, from outreach and assessment to permanent affordable housing. The Pomona Homeless Outreach Program consists of a mobile team including outreach staff from the City of Pomona Homeless Programs Team and outreach professionals from the following agencies: Volunteers of America (Pomona), Tri-City Mental Health Services, East Valley Community Health Center, Los Angeles Homeless Services Authority Pomona Outreach Team, and the Pomona Police Department Quality of Life Teams. The Teams meet chronically homeless persons where they live. They go to these individuals on a regular basis getting to know them, their needs and desires and in the process building trust and rapport. The team has vast connections to service providers within the region and will transport homeless persons to the needed services, benefits and housing. The team assists individuals in filling out paperwork and following up with applications for services.

The Pomona Homeless Outreach Program hosts the LA CoC CES in the eastern region of Service Planning Area (SPA) 3. Outreach workers conduct VI-SPDAT surveys that rank the vulnerability of homeless individuals. Homeless families are referred to the Homeless Family Solutions System and unaccompanied youth are referred to the Youth CES. Those ranked with the highest levels of vulnerability and chronic homelessness are prioritized for housing resources through the CES.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs.**

In order to prevent families and individuals from falling into homelessness, the City of Pomona utilizes Emergency Shelter Solutions Grant (ESG) and Continuum of Care (COC) funds to facilitate homeless prevention and homelessness programs.

Also, the City will continue the implementation a HOME-funded Tenant- Based Rental Assistance Program where the primary goal of the program is to rapidly re-house homeless persons, specifically, transitioning persons from the streets and emergency shelters to permanent supportive housing. Families at risk of becoming homeless may be assisted under TBRA or will be referred to one of the city's partnering service providers who utilize federal and non-federal funds for rental assistance.

Previously, the City utilized Emergency Solutions Grant (ESG) funds to provide rental and security deposit assistance. Assistance was provided to families that had incomes at or below 30% of AMI and who were homeless, faced with imminent eviction or termination of utilities. During this fiscal year, this funding source will be used for emergency shelter services.

**SP-65 LEAD-BASED PAINT HAZARDS – 91.215 (i)****Actions to address LBP hazards and increase access to housing without LBP Hazards**

According to the Los Angeles County Department of Public Health, Childhood Lead Poisoning Prevention Program during 1991 to 2000, approximately 97 children under the age of 6 were reported as having elevated blood levels (EBLs).

It has been found that housing built prior to 1978 may contain hazardous levels of lead based paint, especially for children under six years old. Approximately 30,000 housing units in Pomona were built prior to 1978. Therefore, it is presumed that a large percentage of homes contain lead-based paint. To address this concern, the City will implement lead-based paint regulations in Housing Rehabilitation Programs, the Homebuyer Program, and the Tenant-Based Rental Assistance Program.

During the Consolidated Plan Action Plan period, the City will use \$X awarded under a Round III of a Federal Lead Hazard Control Grant from the Lead-Based Paint Hazard Control Program to undertake the following actions to address lead-based paint hazards: to evaluate and reduce lead-based paint hazards:

**Lead-Hazard Strategies Lead Hazard Control Goals**

- Use the most current brochures regarding the dangers of lead-based paint and make them available to the public at several locations including City Hall;
- Continue testing for the presence of lead-based paint on homes that were built prior to 1978 and which are subject to the City's Housing Programs;
- Continue to conduct lead-based paint risk assessments and abatement when lead based paint tests indicate a hazardous concentration of lead (1mg/cm<sup>2</sup>) for homes that are involved in the City's Housing Programs;
- Continue to inform prospective home rehabilitation candidates during their initial interview about the potential hazards of lead-based paint and any necessary abatement measures that would need to be taken into in order to eliminate the hazard. If the applicant's home was built prior to 1978, staff will inspect the unit to see if potential hazards may exist as a result of the deterioration of paint. If young children (age 6 and younger) are present in the home, and if a potential hazard from possible lead-based paint is identified, staff will inform parents about screening options for the children to determine if elevated blood levels (EBL's) are

present and to follow abatement requirements prescribed due to screening results.

- Ensure that contractor's agreements identify proper ways to abate existing lead-based paint and to require that contractors only use paints that do not contain lead.

**How are the actions listed above related to the extent of lead poisoning and hazards?**

Hazards from Lead-Based Paint are a huge issue in the City of Pomona. As indicated in the Housing Needs Assessment, Pomona has an older housing stock of which a huge percentage is pre-1978. The City will continue to apply for lead hazards control funding to mitigate lead poisoning and hazards.

**How are the actions listed above integrated into housing policies and procedures?**

As the majority of funding used to address housing needs is Federal funding, lead hazards must be assessed and addressed if necessary. Thus, the actions above are integrated into housing policies and procedures for the following Federally funded programs:

1. CDBG
2. HOME
3. Lead Hazard Control Program
4. Housing Rehabilitation Programs
5. First-Time Homebuyer Program

**SP-70 ANTI-POVERTY STRATEGY – 91.215 (J)**

As reported in the 2021 5-Year ACS profile for the City of Pomona, there are 4,067 families and 24,197 individuals living below poverty level. Of the individuals, 16,739 are adults and 8,402 are less than 18 years of age. In addition, 2,258 seniors are estimated to be below the poverty line. The following are often cited as major factors that work to create poverty:

- Lack of education
- Lack of marketable job skills
- General unemployment

- Low wages
- Lack of affordable child care
- Substance abuse
- Lack of reliable transportation

### **Anti-Poverty Goals**

The City has established goals and policies designed to improve the local economy and reduce the level of poverty within the community. The City intends to continue to pursue the following programs and activities to improve local economic conditions and assist residents:

- Integrate existing public services and housing activities for extremely- low and low-income households to create streamlined processes for extremely low and low- income households
- Continue Housing Choice Voucher (Formerly Known as Section 8) and Family Self-Sufficiency Programs for low-income persons to improve their economic status and lessen the need for rental subsidies
- Continue the Section 3 Program that applies to construction projects funded with CDBG funds. The Section 3 Program is intended to provide employment opportunities for low-income people and qualified Section 3 businesses. Continue to work (through information kiosk system and development of data management) to improve access for residents to information regarding opportunities, as well as to improve service coordination for providers



**SP-80 MONITORING – 91.230**

Programs administered and monitored by the City include the following:

- CDBG
- HOME
- ESG

Monitoring Standards and Procedures

The City will use various types of monitoring standards to ensure compliance with Federal regulations governing the use of CDBG funds. Monitoring procedures include: monthly desk audits, review of monthly/quarterly performance reports, review of monthly/quarterly financial billing, and on-site inspections.

Performance of planned projects and activities of these funds are monitored depending on type of program and reporting requirements. Monitoring is viewed as a way to identify deficiencies and promote corrections in order to improve performance. The actual activity of monitoring helps promote quality performance, as well as identify any need for further technical assistance. The following is a description of the types of monitoring performed by staff:

- Performance monitoring
- Financial monitoring
- Davis-Bacon Compliance
- Section 3 Compliance
- Environmental Review Compliance

Monitoring includes: on-site visits, interviews, telephone contacts, and reports. The Subrecipient Agreement is used to measure funded agency compliance.

The City operates in accordance with the monitoring plan developed for CDBG and HOME Programs, including an annual single audit in conformance with OMB Circular 133-A. The Project Monitors also monitor all activity of the program on a monthly basis, while financial management is monitored jointly by the Project Monitor, Supervisor, and the City's fiscal department.

**A. Performance Monitoring Reporting/Tracking Systems**

Performance is tracked and reported as stated above. The labor compliance officers and/or representative review reports. Any discrepancies are addressed with the appropriate entities. Records on performance are kept in the project file. Accuracy of data is confirmed by site visits and monitoring.

**B. Financial Monitoring**

All project costs are paid on a reimbursement basis, rather than paid in advance. A request for reimbursement must have appropriate documentation attached to verify all expenditures. A current report of program activities must also be attached to the draw down request.

The combination of data from the request and the program activities report provides the data necessary to input data into the IDIS system. Collecting this data during the program year is very helpful in compiling reports. By requiring documentation in association with reimbursement, the City's Planning and Housing Department - Housing Division and Finance Department are able to closely monitor program requirements and ensure program goals are being met.

**C. Davis-Bacon Compliance Monitoring**

Davis-Bacon regulations require contractors and subcontractors to pay a certain wage to employees in various labor classifications. These regulations are a requirement of CDBG and HOME Program Subgrantee Agreements. All applicable CDBG and HOME Program projects are monitored regarding their conformance with Davis-Bacon requirements.

The lead person in Community Services or Public Works checks the state board to ensure contractors selected are licensed. The debarred list from the HUD Home Page is also used. Once the contractor is selected, the contractor signs a contract. The City representative conducts a preconstruction conference, reviews contractor and subcontractor payrolls, and makes site visits and interviews contractor/subcontractor employees. Interview forms are compared with appropriate payrolls to ensure hours and pay is correct. All paperwork requirements are kept by the City. Site visits give staff the visual perspective of project progress and confirm reported performance and supplement written reports. Site visits are made

to see how services are delivered to clients, provide technical assistance, and inspect progress of construction projects.

#### **D. Environmental Review Compliance**

Each project that is budgeted is first reviewed for compliance with the National Environmental Protection Agency regulations (NEPA). California Environmental Quality Act (CEQA) regulations may also apply. Projects that are community service in nature are exempt from NEPA. Projects that require further investigation are researched using input from Environmental Regulatory Agencies. For projects that fall in this category, a description of the project is sent to the State Office of Historic Preservation and to other applicable regulatory agencies for consultation. Once required consultations have been completed and any mitigation measures identified, the City prepares the appropriate paperwork, including the Statutory Worksheet and publishes a combined NOI/RROF and/or a Finding regarding impacts (if the project is an Environmental Assessment [EA]).

Once environmental clearance has been obtained, the project can move forward to City Council and/or bid, etc., as appropriate. The supervisor monitors all Environmental Reviews.

#### **E. Other Monitoring Standards**

##### Compliance with Housing Codes/Property Standards:

In order to ensure compliance with local housing codes, the City takes the following actions:

1. Incorporates local housing codes in written rehabilitation standards.
2. Inspects work write-ups to ensure specifications meet code.
3. Performs on-site property inspections to ensure property standards and local housing codes are actually met.
4. Maintains an inspection checklist in project files.

##### Timeliness of Expenditures

The City will implement the following actions as a part of its policy and procedures to ensure timely expenditure of CDBG funds:

1. Monthly review of project expenditure rates.

2. Include provisions in annual contracts and MOUs to subrecipients reiterating Federal requirements for use of CDBG funds, including timely expenditure of funds.
3. Group infrastructure projects together for design and bidding to help expedite processing and ensure timely completion of projects and expenditure of CDBG funds. The projects will be grouped together for bidding and design based on similar work, but tracked individually during the construction phase for status, compliance with labor standards and expenditures.
4. Evaluate infrastructure projects on a quarterly basis for status/progress and completion; CDBG funds will be transferred from stalled or slow-moving projects, subject to Council approval, to projects that are progressing toward construction.

## VI. ANNUAL ACTION PLAN

### Introduction

The City of Pomona's One Year Action Plan for Fiscal Year (FY) 2023-2024 includes the activities the City will undertake to address its priority needs and local objectives as outlined in its approved five year Consolidated Plan. These activities will be addressed using funds received during the FY 2023-2024 program year under the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) Programs. This Action Plan is a yearly funding plan.

Activities detailed in the Plan must meet one of the objectives of the funding types. In general, these objectives are:

- Activities which benefit low and moderate income persons;
- Activities which aid in the prevention or elimination of slums or blight;
- Activities that are designed to meet community development needs having a particular urgency; and
- Activities that provide services to the homeless and which prevent homelessness (ESG).

### Standard 424 Forms – Application Process

REFER TO APPENDIX A: SF 424 Applications for the CDBG, HOME, and ESG Programs

The City's UEI Number is: **QLK7V1HAF1J2**

### AP-15 EXPECTED RESOURCES (91.220 (c)(1,2))

The FY 2023-2024 formula entitlement allocations are estimated as follows: Community Development Block Grant (CDBG) at \$1,771,564, HOME Investment Partnerships (HOME) at \$905,134 and Emergency Solutions Grant (ESG) Program at \$159,204.

<b>2023-24 ENTITLEMENT ALLOCATIONS &amp; REALLOCATED FUNDS</b>	<b>AMOUNT</b>
Community Development Block Grant (CDBG)	\$1,771,564
HOME Investment Partnerships	\$905,134
Emergency Solutions Grant (ESG) programs	\$159,204
<b>ENTITLEMENT ALLOCATIONS TOTAL</b>	<b>\$2,835,902</b>
FY 23-24 CDBG Anticipated Program Income	\$0
FY 23-24 HOME Anticipated Program Income	\$0
FY 23-24 HOME Carryover/Reprogrammed Funds	\$X
FY 23-24 ESG Carryover/Reprogrammed Funds	\$X
<b>Total</b>	<b>\$0</b>

Table 6- Expected Resources – Priority Table

**Use of Funds and Anticipated Outcomes are identified in Appendix C: Summary of Annual Goals and Objectives.**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The following represents descriptions of the Federal resources available during FY 23-24.

Community Development Block Grant (CDBG)

CDBG funds are awarded to cities on a formula basis to develop viable urban communities by providing decent housing, a suitable living environment, and expanded economic opportunities to low-to-moderate income persons.

HOME Investment Partnership Act (HOME)

HOME funds are awarded to cities on a formula basis and can be used for various housing activities that assist low-to-moderate income households. These activities include new construction, acquisition, rehabilitation, homebuyer assistance, tenant-based rental assistance and program planning/administration.

Emergency Solutions Grants (ESG)

These funds are awarded to cities on a formula basis to assist individuals and families to quickly regain stability in permanent housing after experiencing homelessness and

to prevent homelessness. For Fiscal Year 2023-2024, the City estimates receiving \$159,204 in ESG funds for those currently homeless.

Continuum of Care (Formerly Supportive Housing Program (SHP)

These program funds assist individuals and families experiencing homelessness and to provide the services needed to help such individuals & families move into transitional and permanent supportive housing, with the goal of long-term stability and self-sufficiency.

CARES ACT (COVID-19) STIMULUS FUNDING

On March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act or the "CARES Act". The Act identified additional funding for the Emergency Solutions Grant (ESG) Program and the Community Development Block Grant (CDBG) program to support preparation for and response to the community impacts of the COVID-19 pandemic. HUD's distribution plan for the additional funding included multiple phases: an initial phase that would allow for quick access to funding necessary to address the immediate crisis resulting from the rising pandemic, as well as later phases that would support post-pandemic community recovery.

HOME-AMERICAN RESCUE PLAN (HOME) ARP

On March 11, 2021, Congress approved a \$1.5 trillion American Rescue Plan (ARP). This plan contains \$5 billion for affordable rental housing and homeless assistance through the Home American Rescue Plan (HOME-ARP). Approximately \$197 million in HOME-ARP funds was allocated to thirty cities in Los Angeles County. These formula block grant funds, provide cities with flexible funding to reach populations experiencing homelessness, or those currently at risk of homelessness and address local affordable housing, non-congregate shelter, and supportive service needs within respective communities.

These funds are not the traditional HOME Program funds, but are also administered through the HUD and intended to address homelessness. Eligible uses of HOME-ARP funds include the following activities:

1. Administration and Planning;
2. Development and Support of Affordable Rental Housing;
3. Tenant-Based Rental Assistance;
4. Supportive Services for Qualifying Populations; and
5. Acquisition and Development of Non-Congregate Shelter (NCS)

**Match Funds**Home Match:

Federal regulations require a 25% match for the HOME Program. The City does not provide match to HOME funds due to match contribution from the State.

ESG Match

Federal regulations require a 100% match for ESG funds. The City will ensure that there is a 100% match to the ESG entitlement grant.

**Publicly Owned Land or Property in City Used to Address Needs**

Not Applicable

**Discussion****Other Federal Resources:**Housing Choice Voucher Program (Formerly known as Section 8 Rental Assistance)

The Pomona Housing Authority, through its oversight of the Housing Choice Voucher (HCV) rental assistance program, is entitled to administer a maximum of 1,124 housing choice vouchers, including vouchers for homeless veterans, administer Port-In vouchers, and a Shelter Plus Care grant. These vouchers provide housing assistance to approximately 2,800 residents of Pomona. Very low-income families choose and lease safe, decent, and affordable privately-owned rental housing, including single-family homes, townhouses, and apartments.

Housing Choice Voucher – Family Self Sufficiency (FSS) Program:

FSS is a program that enables HUD assisted families to increase their earned income and reduce their dependency on welfare assistance and rental subsidies. This is accomplished by setting goals and creating a plan for the family, in addition to providing individual case management and mentoring.



**Non-Federal Resources/Leveraging**

In addition to the Federal resources indicated, the City uses a variety of mechanisms to leverage additional resources. In street reconstruction, other funds besides CDBG are used to fulfill the requirements of the City's pavement management program, such as Gas Tax. In public services, funds are either received as part of the program operation or CDBG funds are used with other forms of funding. In recreation facilities and other construction, the City leverages funds from a variety of sources, such as Parks and Recreation Bond funds. The following represents descriptions of non-Federal resources that support housing and community development needs.

**General Funds**

The General Operating fund of the City used to account for all the general revenue of the City not specifically levied or collected for other City funds. Major revenue sources included property taxes, utility users and sales taxes, and motor vehicle in-lieu fees.

**Gas Tax Funds**

The State Gas Tax is revenue received by the City from the State of California. These funds can be used for either street maintenance or construction.

**PLHA**

For FY 2023-2024, the City of Pomona will spend remaining funds in the Permanent Local Housing Allocation (PLHA) Program Funding from the State Department of Housing and Community Development. The goal of this program is to make funding available to eligible local governments for housing related projects and programs that assist in addressing the unmet housing needs of the community. The City plans to use these funds for homebuyer assistance creation/ conversion of accessory dwelling units and junior accessory dwelling units to rent to low-income residents and creation of affordable rental housing.

**LEAD HAZARD CONTROL AND HEALTHY HOMES**

The Lead Hazard Control and Healthy Homes program is designed to eliminate lead based paint hazards in privately owned housing that were constructed prior to 1978, giving preference to units with children aged 6 years and below. In conjunction with lead, it further aims to minimize other risks to health and safety to housing occupants such as falls, carbon monoxide poisoning, pests, and entry by intruders. Additionally, these funds will be used to implement the City's Lead Education Awareness Control and Healthy Homes Program (LEAC+HH).

**AP-20 ANNUAL GOALS AND OBJECTIVES**

Annual Goals and Objectives are identified in Appendix C: Summary of Annual Goals and Objectives, for each proposed activity.

**Projects****AP-35 PROJECTS/ACTIVITIES (91.220 (d))****Introduction**

The following represent a summary of the projects /activities to be undertaken during FY 2021-2022 utilizing Federal CDBG, HOME, and ESG funds:

**Projects**

#	Project Name
1	ADMIN - CDBG Program Administration
2	ADMIN – HUD Section 108 Loan
3	Assistance League of Pomona Valley (Dental Center)
4	Assistance League of Pomona Valley (Operation School Bell)
5	Ayudar Foundation (Pathways to Success)
6	Bithiah's Family Services (Mentorship Program)
7	Bright Prospect (Bright Prospect College Access and Success Program)
8	Catholic Charities of Los Angeles Inc. (Homeless Prevention Program)
9	Claremont After-School Program (Pomona After-School Scholars Program (PASS))
10	Foothill Family Shelter (Stepping Stones)
11	God's Pantry (Senior Meal Delivery Program)
12	House of Ruth, Inc. (Housing Retention for Survivors of Domestic Violence)
13	Housing Rights Center (Fair Housing Services)
14	Inland Fair Housing and Mediation Board (Fair Housing Services)
15	Pomona Unified School District (JROTC @ Ganesha, Garey & Pomona High Schools)
16	PCS Family Services (Youth Diversion and Development)
17	PEARLS of Service, Inc. (On the Spot Essay Project)
18	UrbanMission Community Partners (South Pomona Food Hub)
19	CS-Enrichment Activities for the Elderly
20	CS-Pomona Music Program
21	NSD-CDBG Homeless Services
22	PD-Community Orientated Policing Program (CPOP)
23	NSD-Housing Improvement Program (HIP)
24	NSD-Housing Services
25	DS-Code Compliance Program
26	PW-ADA Path of Travel
27	PW – Street Improvements (FY 23-24 to FY 24-25)

28	PW-Streetlights – Citywide (FY 23-24 to FY 24-25)
29	ADMIN - ESG Program Administration
30	ESG Projects 2023
31	ADMIN - HOME Program Administration
32	HOME CHDO
33	HOME First-Time Homebuyer
34	HOME – Single Family housing Rehabilitation

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Approximately seventy percent (70%) of CDBG will be targeted to projects that are within target areas/CDBG-eligible areas, including: (INSERT PROJECTS). The remaining thirty percent (30%) of funds will benefit low-income residents citywide. One Hundred percent (100%) of CDBG funds will be dedicated to projects that benefit low-income residents citywide.

The City of Pomona continues to expended CDBG funds on a variety of activities that meet underserved needs. These programs provided new or expanded accessibility, affordability and sustainability to decent housing, improved public facilities, and a suitable living environment for low-income persons. Such programs included: homeownership assistance, housing rehabilitation programs, rental assistance, health and public services, graffiti removal, code enforcement, and fair housing services to meet underserved needs.

## AP-38 PROJECT SUMMARY

## Project Summary Information

1	<b>PROJECT NAME</b>	CDBG PROGRAM ADMINISTRATION
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Planning and Program Administration
	<b>Needs Assessment</b>	Administration
	<b>Funding</b>	CDBG \$354,313
	<b>Description</b>	General management and program oversight
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Programs will be implemented citywide and the City's population of 155,370 will benefit as a whole.
	<b>Location Description</b>	Citywide- City of Pomona, CA
	<b>Planned Activities</b>	CDBG Programs management and oversight
2	<b>PROJECT NAME</b>	CDBG HUD Section 108 Loan
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Expand Economic Development Opportunity/Section 108 Payments
	<b>Needs Assessment</b>	Housing
	<b>Funding</b>	CDBG \$13,000
	<b>Description</b>	Loan payment and interest
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Assist 1 business
	<b>Location Description</b>	505 S. Garey Avenue, Pomona, CA 91766
	<b>Planned Activities</b>	Eligible Project
3	<b>PROJECT NAME</b>	ASSISTANCE LEAGUE OF POMONA VALLEY - DENTAL PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$4,800
	<b>Description</b>	Funds to be used for dental treatments for low-income youth in the City of Pomona.

		<b>Target Date</b>	
		<b>Estimate the number and type of families that will benefit from the proposed activities</b>	6/30/2024
		<b>Location Description</b>	655 N. Palomares Street, Pomona CA 91766
		<b>Planned Activities</b>	Dental Assistance
4		<b>PROJECT NAME</b>	ASSISTANCE LEAGUE OF POMONA VALLEY - OPERATION BELL
		<b>Target Area</b>	CITY OF POMONA - CITYWIDE
		<b>Goals Supported</b>	Provide Quality Public Services
		<b>Needs Assessment</b>	Public Services
		<b>Funding</b>	CDBG: \$4,956
		<b>Description</b>	Funds to provide youth with jeans, pants or other gently used clothing that are needed to enhance self-esteem and promote learning while in school.
		<b>Target Date</b>	6/30/2024
		<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1000 low income youth.
		<b>Location Description</b>	655 N Palomares St. Pomona, CA 91766
		<b>Planned Activities</b>	Assistance with clothing to enhance self-esteem and promote learning in school.
5		<b>PROJECT NAME</b>	AYUDAR FOUNDATION – PATHWAYS TO SUCCESS
		<b>Target Area</b>	CITY OF POMONA - CITYWIDE
		<b>Goals Supported</b>	Provide Quality Public Services
		<b>Needs Assessment</b>	Public Services
		<b>Funding</b>	CDBG: \$4,956
		<b>Description</b>	Public Services
		<b>Target Date</b>	6/30/2024
		<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1,000 low-income youth.
		<b>Location Description</b>	725 Leather Oak Lane, Pomona, CA 91766
		<b>Planned Activities</b>	To provide social and emotional skill building activities for youth and their families.

6	<b>PROJECT NAME</b>	BITHIAH'S FAMILY SERVICES – MENTORSHIP PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$1,500
	<b>Description</b>	Public Services
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 500 low-income youth.
	<b>Location Description</b>	1111 N. Mountain Avenue, Claremont, CA 91711
	<b>Planned Activities</b>	Afterschool education and recreation activities
7	<b>PROJECT NAME</b>	BRIGHT PROSPECT- COLLEGE ACCESS AND SUCCESS PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$1,750
	<b>Description</b>	Provide a mentoring program to 500 transitional-aged students
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1,000 low-income youth would be served
	<b>Location Description</b>	1460 E. Holt Avenue, Suite 74, Pomona, CA 91767
	<b>Planned Activities</b>	Mentorship Program
8	<b>PROJECT NAME</b>	CATHOLIC CHARITIES OF LOS ANGELES, INC.-HOMELESS PREVENTION
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Support Homelessness Activities
	<b>Needs Assessment</b>	Homelessness
	<b>Funding</b>	CDBG: \$500
	<b>Description</b>	Catholic Charities Homeless Prevention Program will provide with direct rental assistance and housing stability case management.
	<b>Target Date</b>	6/30/24

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1 to 2 households
	<b>Location Description</b>	1531 James M. Wood Blvd. Los Angeles, CA 90015
	<b>Planned Activities</b>	Homeless Prevention Program
9	<b>PROJECT NAME</b>	CLAREMONT AFTER SCHOOL PROGRAM – PASS
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$1,250
	<b>Description</b>	Provide after school homework assistance, enrichment, recreation, nutrition and transportation for the Claremont Unified School District students that live in Pomona.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 70 low-income youth.
	<b>Location Description</b>	1111 N. Mountain Avenue, Claremont, CA 91711
	<b>Planned Activities</b>	Afterschool Education and Recreation activities
10	<b>PROJECT NAME</b>	FOOTHILL FAMILY SHELTER
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Support Homeless Activities
	<b>Needs Assessment</b>	Homelessness
	<b>Funding</b>	CDBG \$1,500
	<b>Description</b>	Provide persons emergency shelter with essential services
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 70 low-income persons. Approximately 24 families.
	<b>Location Description</b>	1501 W. Ninth Street, Suite D, Upland, CA 91786
	<b>Planned Activities</b>	Provide a fully furnished apartment for approximately homeless adults and children for 120 days, weekly counseling, case management meetings and employment services.
11	<b>PROJECT NAME</b>	GOD'S PANTRY – SENIOR MEAL DELIVERY PROGRAM



	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG \$7,000
	<b>Description</b>	Provide meals to 90 seniors
	<b>Target Date</b>	6/30/24
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 90 seniors will be served with meals.
	<b>Location Description</b>	250 E. Center Street, Pomona, CA 91767
	<b>Planned Activities</b>	Provide meal delivery program
12	<b>PROJECT NAME</b>	INLAND FAIR HOUSING MEDIATION BOARD - FAIR HOUSING SERVS.
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Promote Fair Housing Opportunity
	<b>Needs Assessment</b>	Fair Housing
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	Provide fair housing services which include counseling, mediation, and general housing services to persons.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 100 low-income persons.
	<b>Location Description</b>	1500 South Haven Avenue, Ontario, CA
	<b>Planned Activities</b>	Fair Housing counseling, tenant-landlord mediation and other fair housing services.
13	<b>PROJECT NAME</b>	HOUSE OF RUTH, INC.: RETENTION FOR SURVIVORS OF DV
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$ 3,500
	<b>Description</b>	Provide counseling and case management to battered women and their children.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 50 low-income persons.
	<b>Location Description</b>	599 North Main Street, Pomona, CA 91768
	<b>Planned Activities</b>	Counseling and Case Management
14	<b>PROJECT NAME</b>	HOUSING RIGHTS CENTER- FAIR HOUSING SERVS.
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Promote Fair Housing Opportunity
	<b>Needs Assessment</b>	Fair Housing
	<b>Funding</b>	CDBG: \$26,000
	<b>Description</b>	Provide fair housing services which include counseling, mediation, and general housing services to persons.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 240 low-income persons.
	<b>Location Description</b>	1500 South Haven Avenue, Suite 100, Ontario, CA 91761
	<b>Planned Activities</b>	Fair Housing counseling, tenant-landlord mediation and other fair housing services.
15	<b>PROJECT NAME</b>	PCS FAMILY SERVICES – YOUTH DIVERSION AND DEVELOPMENT
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$3,000
	<b>Description</b>	Provide mentorship program
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately XXX low-income youth.
	<b>Location Description</b>	383 N. Main Street, Pomona, CA 91768
	<b>Planned Activities</b>	Leadership and Empowerment Program Activities
16	<b>PROJECT NAME</b>	PEARLS OF SERVICESERVICES, INC. – ON THE SPOT ESSAY PROJECT

	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$1,752
	<b>Description</b>	Provide mentorship program
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 135 low-income youth.
	<b>Location Description</b>	50 Los Coyotes Dr., Pomona, CA 91766
	<b>Planned Activities</b>	Educational supportive services
<b>17</b>	<b>PROJECT NAME</b>	POMONA UNIFIED SCHOOL DISTRICT - JROTC LEADERSHIP PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$2,000
	<b>Description</b>	Provide leadership skill development, social and academic discipline to low-income youth.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 300 low-income youth.
	<b>Location Description</b>	800 S. Garey Avenue, Pomona, CA 91768
	<b>Planned Activities</b>	Leadership and Empowerment Program Activities
<b>18</b>	<b>PROJECT NAME</b>	URBANMISSION COMMUNITY PARTNERS-SOUTH POMONA FOOD HUB
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$1,000
	<b>Description</b>	Unhoused Pomona residents will be provided with food and resource access, community education and green space. Establish an urban farm.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 33 low-income persons.
	<b>Location Description</b>	810 S White Ave, Pomona, CA 91766, United States
	<b>Planned Activities</b>	Access to food and resources for unhoused residents
<b>19</b>	<b>PROJECT NAME</b>	CS – POMONA MUSIC PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$14,000
	<b>Description</b>	Provide a music program for 15 low-income youth.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 15 low-income youth.
	<b>Location Description</b>	600 Philadelphia Street, Pomona, CA 91766
	<b>Planned Activities</b>	Music lessons and performances
<b>20</b>	<b>PROJECT NAME</b>	CS - ENRICHMENT ACTIVITIES FOR THE ELDERLY
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$14,741
	<b>Description</b>	Provide enrichment and cultural activities to 60 seniors
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 60 low-income persons.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Provide enrichment and cultural activities to seniors
<b>21</b>	<b>PROJECT NAME</b>	NSD - CDBG HOMELESS SERVICES
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE

	<b>Goals Supported</b>	Support Homeless Activities
	<b>Needs Assessment</b>	Homelessness
	<b>Funding</b>	CDBG: \$40,230
	<b>Description</b>	Homeless services at the City's year-round emergency shelter
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 309 low-income persons.
	<b>Location Description</b>	1400 W. Mission Blvd., Pomona, CA 97168
	<b>Planned Activities</b>	Homeless Emergency Shelter Operation Activities
22	<b>PROJECT NAME</b>	PD - COMMUNITY PROBLEM ORIENTED POLICINNG (CPOP)
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Provide Quality Public Services
	<b>Needs Assessment</b>	Public Services
	<b>Funding</b>	CDBG: \$62,942
	<b>Description</b>	Provide enhanced community-based policing program citywide to low income persons.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Provide enhanced community-based policing program citywide to low-income persons.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Anti-crime awareness activities
23	<b>PROJECT NAME</b>	NSD - HOUSING IMPROVEMENT PROGRAM (HIP)
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Create and Preserve Affordable Housing
	<b>Needs Assessment</b>	Housing
	<b>Funding</b>	CDBG: \$84,761
	<b>Description</b>	Create, preserve and maintain existing affordable housing units for low-income households.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 22 low-income households.

	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Homeowner Housing improvements/rehabilitation
24	<b>PROJECT NAME</b>	NSD - HOUSING SERVICES PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Create and Preserve Affordable Housing
	<b>Needs Assessment</b>	Housing Services
	<b>Funding</b>	CDBG: \$100,00
	<b>Description</b>	Funds used for housing services and counseling to households done in connection with the HOME Program.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 20_low-income persons.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Housing counseling and other services done in connection with HOME Program activities
25	<b>PROJECT NAME</b>	DSD - CODE ENFORCEMENT/COMPLIANCE
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Neighborhood Preservation/Eliminate Blight
	<b>Needs Assessment</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$ 315,000
	<b>Description</b>	Provide coordinated and targeted code inspections for violations and health/safety hazards.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 400 housing units will be inspected citywide in eligible areas.
	<b>Location Description</b>	505 South Garey Avenue, Pomona, CA 91766
	<b>Planned Activities</b>	Inspections for code violations and health/safety hazards
26	<b>PROJECT NAME</b>	PW - ADA CURB RAMPS & PATH OF TRAVEL
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Improve Public Infrastructure and Facilities
	<b>Needs Assessment</b>	Infrastructure and Public Facilities Improvements
	<b>Funding</b>	CDBG: \$227,351

	<b>Description</b>	To make ADA access improvements throughout the city
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately <u>XXX</u> low-income persons.
	<b>Location Description</b>	Citywide – Eligible Areas
	<b>Planned Activities</b>	Infrastructure improvements
<b>27</b>	<b>PROJECT NAME</b>	PW Streetlights
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Improve Public Infrastructure and Facilities
	<b>Needs Assessment</b>	Infrastructure and Public Facilities Improvements
	<b>Funding</b>	CDBG: \$117,495
	<b>Description</b>	To make ADA access improvements throughout the city
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately <u>XXX</u> low-income persons.
	<b>Location Description</b>	Citywide – Eligible Areas
	<b>Planned Activities</b>	Infrastructure improvements
<b>28</b>	<b>PROJECT NAME</b>	PW Street Improvements
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Improve Public Infrastructure and Facilities
	<b>Needs Assessment</b>	Infrastructure and Public Facilities Improvements
	<b>Funding</b>	CDBG: \$104,687
	<b>Description</b>	To make ADA access improvements throughout the city
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately <u>XXX</u> low-income persons.
	<b>Location Description</b>	Citywide – Eligible Areas
	<b>Planned Activities</b>	Infrastructure improvements
<b>29</b>	<b>PROJECT NAME</b>	PW Civic Center Plaza Rehabilitation
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE

	<b>Goals Supported</b>	Improve Public Infrastructure and Facilities
	<b>Needs Assessment</b>	Infrastructure and Public Facilities Improvements
	<b>Funding</b>	CDBG: \$94,497
	<b>Description</b>	
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately <u>XXX</u> low-income persons.
	<b>Location Description</b>	Citywide – Eligible Areas
	<b>Planned Activities</b>	Infrastructure improvements
30	<b>PROJECT NAME</b>	HESG - PROJECTS
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Support Homeless Activities
	<b>Needs Assessment</b>	Homelessness
	<b>Funding</b>	ESG: \$147,264
	<b>Description</b>	To support homeless activities through emergency shelter, admin and homeless management information system (HMIS)
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To support homeless activities through emergency shelter, admin and homeless management information system (HMIS) for approximately 100 persons.
	<b>Location Description</b>	1400 E. Mission Blvd., Pomona, CA 91768
	<b>Planned Activities</b>	To support homeless activities through emergency shelter, admin and homeless management information system (HMIS)
31	<b>PROJECT NAME</b>	HESG – PROGRAM ADMINISTRATION
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Support Homeless Activities
	<b>Needs Assessment</b>	Homelessness
	<b>Funding</b>	ESG: \$11,940
	<b>Description</b>	Program administration
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To support homeless activities through emergency shelter, admin and homeless management information system (HMIS) for approximately 100 persons.



	<b>Location Description</b>	505 S. Garey Ave. Pomona, CA 91766
	<b>Planned Activities</b>	Provide general program administration, monitoring, technical assistance, subrecipient training, meetings, preparation and submission of reports.
32	<b>PROJECT NAME</b>	HOME PROGRAM ADMINISTRATION
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Planning and Program Administration
	<b>Needs Assessment</b>	Administration
	<b>Funding</b>	HOME: \$90,513
	<b>Description</b>	Provide general program administration, monitoring, technical assistance, subrecipient training, meetings, preparation and submission of reports.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Provide general program administration, monitoring, technical assistance, subrecipient training, meetings, preparation and submission of reports.
	<b>Location Description</b>	505 South Garey Avenue, Pomona, CA 91766
	<b>Planned Activities</b>	Provide general program administration, monitoring, technical assistance, subrecipient training, meetings, preparation and submission of reports.
33	<b>PROJECT NAME</b>	HOME: COMMUNITY HOUSING DEVELOPMENT CORP (CHDO)
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Expand Economic Opportunities/Section 108 Payments
	<b>Needs Assessment</b>	Housing
	<b>Funding</b>	HOME: \$135,770
	<b>Description</b>	HOME Program Set-Aside of 15% for designated CHDO's.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Assist 1 CHDO Development for low-income household.
	<b>Location Description</b>	505 South Garey Avenue, Pomona, CA 91766
	<b>Planned Activities</b>	CHDO Development Eligible Project
34	<b>PROJECT NAME</b>	HOME: SINGLE-FAMILY HOUSING REHABILITATION
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Create and Preserve Affordable Housing

	<b>Needs Assessment</b>	Housing
	<b>Funding</b>	HOME: \$178,851
	<b>Description</b>	Funds to preserve and maintain existing affordable housing stock for low-income persons through housing rehabilitation.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Funds to preserve and maintain existing affordable housing stock for 3 low-income persons through housing rehabilitation.
	<b>Location Description</b>	505 South Garey Avenue, Pomona, CA 91766
	<b>Planned Activities</b>	Funds to preserve and maintain existing affordable housing stock for low-income persons through housing rehabilitation.
35	<b>PROJECT NAME</b>	HOME: FIRST-TIME HOMEBUYER PROGRAM
	<b>Target Area</b>	CITY OF POMONA - CITYWIDE
	<b>Goals Supported</b>	Expand Affordable Housing Supply
	<b>Needs Assessment</b>	Housing
	<b>Funding</b>	HOME: \$500,00
	<b>Description</b>	To provide homebuyer assistance (down payment and/or closing costs assistance) to low-income households
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	To provide homebuyer assistance (down payment and/or closing costs assistance) to 2 low-income households.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Outreach citywide and determine applicant's program qualifications and suitability

**AP-50 GEOGRAPHIC DISTRIBUTION (91.220 (F))**

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed As referenced in the City's Assessment of Fair Housing (AFH), Pomona as a whole is an ethnically diverse community, with patterns of ethnic concentration present within particular areas. Concentrations of Hispanic residents are evident throughout Pomona's neighborhoods, specifically central Pomona and neighborhoods along the City's eastern border (which also coincides with the Los Angeles County border), including City Center, Wilton Heights, Lincoln Park, Lincoln Park North, Mission-Reservoir, Pomona Adelante, Philips Blvd, South Pomona, and East Side Pomona. The majority of neighborhoods with a concentration of Hispanic residents also exhibit concentrations of Black residents. The concentration of Hispanic residents in the City is notably higher than that in surrounding jurisdictions. This pattern of concentration of Hispanic and minority residents also correlates with the City's more affordable for-sale housing values. In August 2017, the median sales price for homes in Pomona was \$399,000, an increase of close to seven percent from the same month in 2016. However, the City has one of the lowest median home prices among neighboring jurisdictions.

Pomona has historically been a home to Asian and Hispanic minority populations. The San Gabriel Valley (SGV) has an early agricultural history (late 19th century) in its role as part of the Citrus Belt and the California citrus economy, during which Mexican Americans and Asian Americans (Chinese, Japanese, Filipino, South Asian) made up the labor force. Through these early settlement periods, the SGV was divided by race and class and minorities continued to live in ethnic enclaves.

After World War II, a shift from agriculture to manufacturing and technology occurred and with it came an early wave of Asian Americans and Mexican Americans that then pursued homeownership opportunities in SGV areas that were less restricted by race.

Some disparities remain from these eras of racial and class spatial divisions, as currently notable in the San Gabriel Valley, higher proportions of minorities reside in areas with lower median incomes and lower median home prices. In 2011-2015, Pomona's household median income (\$39,378) was significantly lower than those of surrounding jurisdictions.

**Geographic Distribution**

Target Area	Percentage of Funds
CITY OF POMONA - CITYWIDE	100

Geographic Distribution

**Rationale for the priorities for allocating investments geographically**

CDBG funds are expended in each district in accordance with identified priorities/needs. HOME and ESG funds are expended without regard for geographical boundaries. Approximately thirty-seven percent (70%) of CDBG will be targeted to projects that are within target areas/CDBG-eligible areas, including: Community Oriented Policing, Code Enforcement, and Infrastructure/Public Facilities Improvements. The remaining sixty-three percent (30%) of funds will benefit low-income residents citywide. One Hundred percent (100%) of CDBG funds will be dedicated to projects that benefit low-income residents citywide. The City of Pomona continues to expend CDBG funds on a variety of activities that meet underserved needs. These programs provided new or expanded accessibility, affordability and sustainability to decent housing, improved public facilities, and a suitable living environment for low-income persons. Such programs included: homeownership assistance, housing rehabilitation programs, rental assistance, health and public services, graffiti removal, code enforcement, and fair housing services to meet underserved needs.

**Discussion**

None

**AP-55 AFFORDABLE HOUSING (91.220 (G))****Affordable Housing**

A detailed outline of Annual Goals and Objectives, including Housing Goals are identified the Appendices as: Appendix C: Summary of Objectives and Activities Planned for FY 2023-2024

<b>One-Year Goals for the Number of Households to Be Supported</b>	
Homeless	449
Non-Homeless	1050
Special Needs	
<b>Total</b>	<b>1499</b>

<b>One-Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	1499
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
<b>Total</b>	<b>1499</b>

**Discussion**

The Pomona's Housing Authority's (PHA) Annual Contributions Contract provides funding to assist approximately 920 families through its Housing Choice Voucher (HCV), Rental Assistance Program including 60, Homeless Veterans through its Housing and Urban Development Veterans Affairs Supportive Housing (HUD-VASH) Program. The PHA will use additional Mainstream Vouchers to assist 63 non- elderly (under the age of 62) disabled and homeless households. The PHA also administers 3 housing choice vouchers through the Foster Youth Initiative Program to assist homeless foster youth. The PHA will continue to assist additional families through the Emergency Housing Voucher (EHV) Program. The PHA received an allocation of 78 Vouchers through the EHV Program to assist homeless families. The PHA has Project-Based 57 of its Homeless Veterans Vouchers to secure housing for homeless veterans. In FY 23-24 the PHA will project-base 24 of its Housing Choice Vouchers to secure housing for low- income families on the HGV Wait List. The Pomona's Housing Authority's (PHA) Annual Contributions Contract provides funding to assist approximately 920 families through its Housing Choice Voucher Program including 60 Homeless Veterans. The PHA will continue to assist the same number of households in FY 22-23. The PHA recently applied and was awarded xxx (0) housing choice vouchers through the Foster Youth Initiative Program to assist homeless foster youth.

The Homeless Services Division will assist 200 households through the Continuum of Care (COC) Rapid-Re-Housing Program and 98 through the COC Permanent Supportive Housing Program.

HOME funds will be allocated for Housing Rehabilitation efforts that include assisting xxx (0) households through the HOME-funded Single-Family Housing Rehabilitation Program, and xxx (00) with Homebuyer Assistance. **XXX** (00) low-income household will be assisted through the CHDO program to acquire, resale and rehabilitate vacant homes.

Approximately XXX (00) households will be assisted through the CDBG-funded Housing Improvement Program, **XXX** (00) through the Lead Hazard Reduction Program and **XXX** (00) through the Healthy Homes Production program.

**AP-60 PUBLIC HOUSING (91.220 (H))**

The City of Pomona does not have any Public Housing. However, the City does have several assisted housing projects that meet affordability gaps, including the following:

- Housing Choice Voucher Program (Formerly Known as Section 8)
- Federally-Assisted Housing Units
- Affordable Rental Housing
- Project Based Vouchers for Veterans

**Actions planned during the next year to address the needs to public housing**

Not applicable - The City of Pomona does not manage public housing development.

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

Not applicable - The City does not have public housing.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable - The City does not have public housing.

**Discussion**

No further discussion.

**AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES (91.220 (i))**

The needs of homeless and chronic homeless persons range from outreach, case management and referral services to transportation and rental assistance among the many essential services needed to assist with permanent shelter.

A detailed outline of Annual Goals and Objectives, including actions for ending homelessness are identified the Appendices as: Appendix C: Summary of Annual Goals and Objectives, for each proposed activity.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Outreach and Assessment is provided through the Pomona Homeless Assistance Program and the Pomona Homeless Outreach Team. These programs are funded with Emergency Solutions Grant and COC Program funds and are administered by the City. Several of the local non-profits also have outreach teams specific to the field of endeavor (mental health, substance abuse, HIV/AIDS, etc.).

**Addressing the Emergency and Transitional Housing Needs of Homeless Persons**

Emergency and Crisis shelter is funded with ESG and COC funds at the City's Hope For Home Year-Round Shelter. All programs administered by the City are required to assist clients in developing individual service plan and transition plan before exiting the program.

The City has designated ESG funds annually to support emergency shelter programming. Numerous other emergency shelter, transitional living centers, residential detoxification programs, and sober living homes are located in the City of Pomona.

Homelessness prevention, a component under emergency shelter, may include housing relocation and stabilization services as well as short- and medium-term rental assistance to prevent an individual or family from becoming homeless. This program will help individuals and families at-risk of homelessness to maintain their existing housing, transition to new permanent housing or affordable housing units.



**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**

Chronically homeless families are families with adult heads of household who meet the definition of a chronically homeless individual. If there is no adult in the family, the family would still be considered chronically homeless if a minor head of household meets all the criteria of a chronically homeless individual. A chronically homeless family includes those whose composition has fluctuated while the head of household has been homeless.

Addressing comprehensive layered solutions to chronic homelessness, the City has developed and maintains a complete continuum of care, from outreach and assessment to permanent affordable housing. The Pomona Homeless Outreach Program consists of a mobile team including outreach staff from the City of Pomona Homeless Programs Team and outreach professionals from the following agencies: Volunteers of America (Pomona), Tri-City Mental Health Services, East Valley Community Health Center, Los Angeles Homeless Services Authority Pomona Outreach Team, and the Pomona Police Department Quality of Life Teams. The Teams meet chronically homeless persons where they live. They go to these individuals on a regular basis, getting to know them, their needs and desires and in the process building trust and rapport. The team has vast connections to service providers within the region and will transport homeless persons to the needed services, benefits and housing. The team assists individuals in filling out paperwork and following up with applications for services.

The Pomona Homeless Outreach Program hosts the LA CoC CES in the eastern region of Service Planning Area (SPA) 3. Outreach workers conduct VI-SPDAT surveys that rank the vulnerability of homeless individuals. Homeless families are referred to the Homeless Family Solutions System and unaccompanied youth are referred to the Youth CES. Those ranked with the highest levels of vulnerability and chronic homelessness are prioritized for housing resources through the CES.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

Outreach workers conduct VI-SPDAT surveys that rank the vulnerability of homeless individuals. The City of Pomona's Homeless Strategy identifies local and regional planning strategies for coordination among agencies to assist persons that have become homeless or are at risk of being homeless. This coordination includes referrals to an extensive network of private agencies that are a part of the City's Continuum of Care Coalition and referrals to the City's new Hope for Home, Homeless Service Center that opened in December.

**AP-75 BARRIERS TO AFFORDABLE HOUSING (91.220 (j))**

Currently, the demand for affordable housing in Pomona exceeds the supply, especially for those in the extremely-low income, very-low and moderate-income categories.

Barriers to affordable housing include:

1. The reluctance of builders to invest in affordable housing projects, especially apartments.
2. The lack of sufficient financial resources for development of affordable units.
3. The overall relatively slow growth of income versus the rapid increase in population growth and relative increase in housing prices.

**Strategy to Remove or Ameliorate the Barriers to Affordable Housing Affordable Housing Strategies**

- Increase the supply of affordable housing through new construction
- Increase the supply of affordable housing through rental assistance
- Increase affordable housing opportunities through homebuyer assistance
- Increase awareness and educate public on fair housing and barriers to fair housing

As a recipient of CDBG funds, the City of Pomona is required to develop a fair housing program whose specific actions and procedures which will have an impact on preventing, reducing or eliminating housing discrimination and other barriers to equal housing choice based on race, color, religion, sex, national origin, ancestry, familial status or physical or mental handicap.

To ensure consistency with the policies and programs recommended by the Consolidated Plan and to ensure continued compliance with the Fair Housing Certification found at 24 CFR 91.225 (a)(1), the completed an Assessment of Fair Housing (AFH) Report, which replaces the original Analysis of Impediments (AI) to Fair Housing Choice. The AFH was adopted in August 2017, and assisted the City in analyzing market conditions and potential housing barriers to better determine fair housing goals for the Consolidated Plan period.

To encourage the development and conservation of affordable housing, the City has adopted several ordinances:

- **Density Incentives** - City of Pomona utilizes the State's density law to provide up to 35 percent of density bonus to facilitate the development of affordable and senior housing
- **Waiver of Fees** - In addition to the density bonus, the City will facilitate the processing of affordable housing projects by waiving fees, when applicable.
- **Relaxed Standards** - Certain development standards may be relaxed if increased density cannot be physically accommodated on the site. The applicant must show that the density bonus cannot be achieved with each waiver before the waiver is allowed:
  - 1) Parking Requirements
  - 2) Private Open Space
  - 3) Common Open Space
  - 4) Specific Plan Amendments: Downtown Pomona and Pomona Corridors

**Discussion:**

None

**AP-85 OTHER ACTIONS (91.220 (κ))**

The following proposed actions will be undertaken to address the areas indicated below:

Foster and Maintain Affordable Housing

- Acquisition/Rehab for resale or rental housing (to provide affordable units)
- Rental Assistance Programs (to bridge the affordability gap)
- First-Time Homebuyer Program (affordability through down payment assistance)
- Housing Rehabilitation Programs (to preserve existing affordable housing stock)

Evaluation and Reduction of Lead-Based Hazards

- Conduct Inspections and Risk Assessments in conjunction with all housing programs affected by Federal Lead-Based Paint regulations at 24 CFR 35, 24 CFR 570.608 and 24 CFR 982.401.

Reducing the Number of Persons Below the Poverty Line

- Fund public service programs that assist extremely low and low - income persons, including but not limited to employment/training programs, food programs, free or low price health services programs, etc.
- Continue to fund the Housing Choice Voucher (Formerly Known as Section 8) and Family Self-Sufficiency programs for low-income persons to improve their economic status and lessen need for subsidy
- Continue the Section 3 program that applies to construction projects funded with CDBG funds. The Section 3 program is intended to provide employment opportunities for low-income people and qualified Section 3 businesses

Meeting Underserved Needs

The City of Pomona continues to expend CDBG funds on a variety of activities that meet underserved needs. These programs provided new or expanded accessibility, affordability and sustainability to decent housing, improved public facilities, and a suitable living environment for low-income persons. Such programs included:

homeownership assistance, housing rehabilitation programs, rental assistance, health and public services, graffiti removal, code enforcement, and fair housing services.

#### Institutional Structure/Coordination

The City continues to coordinate with non-profit providers, community and faith-based organizations, public institutions, and City Departments in the development of the Consolidated Plan Action Plan.

- Continue to coordinate with non-profit providers, community and faith-based organizations, public institutions, community residents, and City Departments to ensure quality services to low-income persons.

#### Minority/Women-Owned Business Enterprises (M/WBE) Efforts

Minority and Women-Owned Business provisions are included in the City's purchasing/procurement policies. In order to promote the use of minority and women-owned businesses, the City takes the following actions:

1. Maintain and update periodically qualified minority and women-owned businesses on a Bidder List.
2. Disseminate information regarding City bidding procedures and practices to the minority business community.
3. Require that the City's Minority Business Questionnaire be included with all City bids and Requests for Proposals.
4. Provide access to the Ethnic/Women Business and Professional directory to area businesses and contractors upon request.

#### Timeliness of Expenditures:

The City will implement the following actions as a part of its policy and procedures to ensure timely expenditure of CDBG funds:

1. Monthly review of project expenditure rates.
2. Include provisions in annual contracts and MOUs to subrecipients reiterating Federal requirements for use of CDBG funds, including timely expenditure of

funds. Group infrastructure projects together for design and bidding to help expedite processing and ensure timely completion of projects and expenditure of CDBG funds. The projects will be grouped together for bidding and design based on similar work, but tracked individually during the construction phase for status, compliance with labor standards and expenditures.

3. Evaluate infrastructure projects on a quarterly basis for status/progress and completion; CDBG funds will be transferred from stalled or slow-moving projects, subject to Council approval, to projects that are progressing toward construction.

**AP-90 PROGRAM SPECIFIC REQUIREMENTS (91.220 (L) (1,2,4))****CDBG PROGRAM**

The total amount of CDBG funds available for use in FY 2023-2024 is as follows:

<b>23-24 CDBG ALLOCATION AND PROGRAM INCOME</b>	<b>AMOUNT</b>
Community Development Block Grant (CDBG)	\$1,771,564
CDBG Anticipated Program Income	\$00
<b>TOTAL</b>	<b>\$1,771,564</b>

The City does not anticipate carrying over any CDBG funds for use in 2023-2024. Any program income received during the year will be reallocated to eligible projects.

**Allocation of Funds**

Approximately sixty percent (60%) of CDBG will be targeted to projects that are within target areas/CDBG-eligible areas, including: Community Oriented Policing, Code Enforcement, and Infrastructure/Public Facilities Improvements. Remaining funds will benefit low-income residents citywide. One Hundred percent (100%) of CDBG funds will be dedicated to projects that benefit low-income residents citywide.

**Activities to be Undertaken**

(CDBG Activities - To be determined after final HUD allocation)

**Surplus from Urban Renewal Settlements**

The City will not have surplus from urban renewal settlements for the CDBG Program.



**Grant Funds Returned to the Line of Credit**

The City will not have to return any grant funds to the line of credit for the CDBG Program.

**Income from Float-funded Activities**

The City will not have income from float-funded activities for the CDBG Program.

**Funding Urgent-need Activities**

At this time, the City does not anticipate funding any urgent-need activities through the CDBG Program 2023-2024. However, if urgent needs do arise, funds will be reallocated to address those needs and will be reported in the Program Year 2023 CAPER.

**HOME PROGRAM**

The City plans to undertake the following activities using HOME funds:

HOME CATEGORY	ENTITLEMENT AMOUNT	CAP	22-23 CARRYOVER FUNDS
Eligible Activities	\$678,851	(No cap)	
CHDO	\$135,770	(15% cap)	
Administration and Planning	\$90,513	(10% cap)	

**First-Time Homebuyer Program**

The City of Pomona provides a comprehensive First-Time Homebuyer Mortgage Assistance Program (MAP) to eligible low-to-moderate income households for down payment and closing cost assistance toward the purchase of a single-family or detached condominium home. While funds have not been allocated above for this program, the City anticipates using program income funds for the MAP Program.

**Housing Rehabilitation Program**

The City plans to implement a housing rehabilitation program that covers rehabilitation of owner-occupied housing units and rental units in order to preserve the existing affordable housing stock.

**Other Forms of Investment****1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

The City of Pomona does not use a typical loan or grant instruments or non-conforming loan guarantees. There are no forms of investments to be described for HOME funds.

**2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:****HOME Recapture Provisions in First Time Home Buyer Program**

The City of Pomona uses the Recapture Provisions at 24 CFR 92.254 (a)(5)(ii)(A)(5) for its First Time Homebuyer Program. This entails recapturing the amount of HOME assistance that enabled the homebuyer to buy the dwelling unit, as well as any equity realized ("Equity Sharing") at the time of sale, after deducting the costs of sale and any eligible home improvement costs, in proportion to the amount of the City loan provided. The equity share owed shall be prorated over a 45-year affordability period based on each full year of occupancy and compliance with the terms of the loan agreement.

The HOME First Time Homebuyer Program recapture guidelines further entail the following: no monthly payments, with the loan due and payable when the property is sold, transferred, refinanced with cash out, a change in title occurs, default on loan, failure to use the property as principal residence or at the end of HOME affordability period. Deed restrictions and Covenants ensure the affordability of the units.

In the event of foreclosure, transfer in lieu of foreclosure, or when the net proceeds of sale are insufficient to repay the City loan due, the homebuyer is

obligated to repay the net proceeds received by the homebuyer, if any, from the sale of the HOME-assisted property. The net proceeds of sale is the final amount that is given to the homebuyer as a result of a sale after any first mortgage and closing costs are subtracted from the sale price.

#### **HOME Resale Provisions in First Time Home Buyer Program**

The City of Pomona uses the resale provisions at 24 CFR 92.254 (a)(5)(i) specifically for its CHDO project involving the acquisition and rehabilitation of foreclosed and/or vacant properties, to be resold to first time homebuyers. To ensure affordability, the resale provisions require that each HOME-assisted unit sold to an eligible homebuyer is made available for subsequent purchase only to another low-income family having incomes at no more than 80% of the Los Angeles county median income and who will use the HOME-assisted unit as their principal residence. In addition, the price at resale must provide the homeowner a fair return on investment and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers. These provisions are enforced through Homebuyer Covenants, which are recorded against the property.

Fair Return on Investment is defined as the return of the homeowner's original investment plus any eligible capital and curb appeal improvements, less the amount of deferred maintenance that does not meet HUD's Uniform Physical Condition Standards. The difference shall be multiplied by the percentage change in the consumer price index (CPI) between the initial purchase date and the subsequent sale date. The City of Pomona will be using the CPI for the Los Angeles-Riverside-Orange County area as published by the U.S. Department of Labor, Bureau of Labor Statistics.

Reasonable Range of Low-Income Homebuyers refers to subsequent homebuyers having incomes at no more than 80% of the Los Angeles County median income and who pays no more than 30% of the household's gross income for housing cost.

(See Appendix J: Recapture/Resale Guidelines)

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

For HOME-funded programs, the applicable affordability periods per HOME investment is provided as follows:

Homeownership Assistance HOME amount per unit	Minimum Period of Affordability in Years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

Based on the loan amount of \$100,000, the HOME affordability period for the City's First Time Homebuyer Program is 15 years. In addition, due to California Redevelopment Agency/Housing Successor Agency's requirement, the City of Pomona requires another 30-year affordability period. In the regard, program beneficiaries of the First Time Homebuyer Program must occupy the assisted property for a total of 45 years.

The period of affordability for the CHDO project involving the acquisition and rehabilitation of foreclosed or vacant properties for resale to first time homebuyers is fifteen (15) years. In this regard, the provisions involving a fair return on investment to the original owner, and accessibility of the assisted-unit to a reasonable range of low-income homebuyer only apply during this 15-year period.

**4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

The City does not intend to use HOME funds to refinance existing debt secured by multi-family housing that is being rehabilitated with HOME funds. The City's Housing Rehabilitation Program applies only to single- family residences.

**ESG PROGRAM**

The City plans to undertake the following activities using ESG funds:

ESG CATEGORY	AMOUNT	CAP	22-23 Carryover Funds
Homeless Prevention		(No cap)	
Street Outreach		(60%cap)	
Emergency Shelter	\$95,552	(60% cap)	
Rapid Re-Housing		(No cap)	
HMIS	\$51,712	(No cap)	
Administration	\$11,940	(7.5% cap)	

**TOTAL AVAILABLE FUNDING: \$159,204**

**Emergency Solutions Grant**

In FY 23-24 Pomona expects to receive \$159,204 from the FY 23-24 entitlement funds for eligible ESG activities. Annually, the City budgets its ESG funds to most effectively meet the needs of the homeless. The programs funded either maintain services or expand to fill a gap in the City's CoC delivery system. ESG funds are allocated primarily for costs associated with the operation of emergency shelters and essential services. The CoC provides a comprehensive response to the different needs of homeless individuals and families so that they can make the critical transition from the streets to independent living.

The City of Pomona has developed the following standards for providing assistance to the homeless through its Continuum of Care (COC) and Emergency Solutions Grants (ESG) funds as required by 24 CFR Part 576. And 24 CFR Part 578. These standards represent goals for providing services for the community.

**Evaluating eligibility for families and individuals**

**Intake and Assessment.** Case managers will review client situation, understand eligibility and begin the process of determining homelessness status and necessary services. Any client assessed for potential assistance must meet HUD criteria homeless or at risk or homelessness. Any new client is encouraged to

participate in a complete assessment to understand client needs and barriers. The following outlines the individual characteristics of clients qualifying for homelessness prevention or rapid re-housing.

**Coordinating Services** All subrecipients (shelter, homelessness prevention and rapid re-housing providers) within the City of Pomona Continuum of Care service area are expected to work collaboratively to address the needs of the homeless within the area. To achieve these goals, City of Pomona requires that all subrecipients service providers will:

- a. Participate in the Pomona Continuum of Care Coalition.
- b. As the Los Angeles Homeless Services Authority rolls out the centralized and coordinated Assessment (CES) and referral system, all subrecipients and the City of Pomona will participate in the Continuum system.
- c. Establish a staff member as a point of contact for other case managers and members of the service provider continuum of care. The contact should be a position that sees little turnover and is familiar with organizational resources and up to date on current organizational capacity to accept and serve clients, such as a supervisor or manager. This contact should be able to provide information for other housing case managers on what current programs and resources are available to clients entering into the provider system through their organization. This contact will reduce or eliminate the need for clients to seek out additional assistance based on referrals from any recipient agency.
- d. Attend training for case managers within the homeless provider system.
- e. Each subrecipient is expected to send at least one staff member to Pomona CoC meetings and share all lessons learned with all housing case management staff. City of Pomona, in collaboration with the Pomona Continuum of Care Coalition (PCOCC) and the Los Angeles Homeless Services Authority (LAHSA), will coordinate training for relevant personnel so that clients within the region are receiving the same quality of service across providers. The members of the Continuum will also participate in regular meetings to share best practices and engage in collective problem solving as the community works toward an integrated system for clients.

**If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system**

The Los Angeles County Coordinated Entry System (CES) is a critical component of Los Angeles' countywide systemic response to ending homelessness. The City of Pomona participates in this collaborative network that ensures the highest need, most vulnerable households in the community.

are prioritized for services and that the housing and supportive services in the system are used as efficiently and effectively as possible. The CES Policies and Procedures establishes a set of policies and guiding principles and practices for the Coordinated Entry System (CES) service providers and system partners centered around respect, accountability, consistency, and integration. The CES also coordinates street outreach to people experiencing homelessness and uses an assessment survey to triage and prioritize by vulnerability and needs. Housing Navigators help participants collect required documents, identify housing and accompany participants to housing appointments.

Homeless families access the HFSS through LA County 2-1-1, the County information and referral line. After calling 2-1-1, families are referred to their closest Family Solutions Center (FSC). Families can also be referred directly to the FSC through a partnered homeless shelter or other homeless service provider. Regionally based Family Solutions Centers (FSC) are the system's primary point of entry. The FSC conducts an assessment to determine the most appropriate housing intervention for a family. Families are connected to services and housing options which help them stay in their local community near friends, family, and other support networks.

Prioritizing and Determining Assistance for either Homeless Prevention (HP) or Rapid Re-Housing (RRH)

*Eligibility*

There is one major difference between RRH assistance under the ESG Program and the COC program with regard to eligibility. To receive ESG RRH assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (Category 1). To receive COC RRH assistance, individuals and families

may be defined as homeless under any of the four categories included in the Homeless Definition Final Rule (Categories 1, 2, 3 or 4).

**Identify the process for making sub-awards and how the ESG allocation is made available to private nonprofit organizations**

The City of Pomona invites local non-profit agencies to submit proposals for funding under the following grants: the Emergency Shelter Grant (ESG), the HOME Investment Partnership Act (HOME), and the Community Development Block Grant (CDBG), a social services component of the Consolidated Plan program. If the agency or organization is applying for two types of service or funding, then two separate proposals are to be enclosed. Additional copies of the proposal could be obtained from CDBG or by simply making a copy of the attached proposal.

To be considered for funding, an organization must have:

1. 501(c) (3) IRS tax status
2. Be in good standing with the State of California
3. Serve low-income residents of Pomona or serve an eligible neighborhood as indicated in the enclosed RFP, and
4. Have a demonstrated ability to deliver the services proposed.

Proposals will be assessed based on content and adherence to HUD national objectives. Proposals will be submitted to the Finance Department Purchasing Division to be date and time stamped. After the deadline has passed, Purchasing will forward the Housing Division Grant Administration staff. Staff reviews proposals to determine eligibility and forwards information to Council for all eligible activities. City Council will review proposals and make funding awards.

A. Background

The Request for Proposal (RFP) announces the availability of funding for the Program Year for the Community Development Block Grant (CDBG) and Emergency Shelter Grant Program (ESG). Programs for the HOME Investment Partnership Act (HOME) are implemented by City staff. All programs are



funded and regulated at the federal level by the U.S. Department of Housing and Urban Development (HUD) and administered locally by the City of Pomona, under the auspices of the Community Development Department. The CDBG Program is authorized under Title I of the Housing and Community Development Act of 1974. The regulations implementing the CDBG Program are located in the 24 CFR, Part 570. The regulations implementing the ESG Program are located in the 24 CFR, Part 576 and authorized under the Stewart B. McKinney Homeless Assistance Act of 1988. The regulations implementing the HOME Program are located in the 24 CFR, Part 92.

The City's objectives of these programs in accordance with national objectives are to: Ensure decent housing, Secure a suitable living environment, Provide economic growth and opportunity, Aid in the elimination of slum and blight, and Respond to an urgent need.

**B. Funding Available**

The City of Pomona is an ESG Entitlement Program City (cities with population over 50,000). As an ESG Entitlement city, the City of Pomona receives an annual allocation of ESG funds. If funds are to be awarded to subrecipient agencies, the City will release a Request for Proposals (RFP). Community meeting and informational flyers are distributed annually to notify the public of the funding amount available.

**If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG**

The City of Pomona and/or its subrecipients will provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

If the City is unable to meet this board membership requirement, we will instead implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

#### *Homeless Participation Plan*

In order to involve homeless individuals and families, the City and/or its subrecipients will do the following when considering and making policies and decisions in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG:

1. Inclusion and Consultation through the Pomona Continuum of Care Coalition Meetings
2. Inclusion and Consultation through the Homeless Advisory Committee Meetings
3. Employment or Volunteer Services of Homeless Persons on ESG funded projects, including those involving the construction, renovation or operating of facilities

#### **Performance standards for evaluating ESG**

1. A description of services provided during the reporting period
2. # of persons served
3. Ethnicity and Race of persons served
4. Income level of persons served
5. Female-Headed Household Status
6. Areas of benefit

Staff will use the information submitted to track expenditure percentages and the number of persons benefiting from the activity in order to ensure that activity/program goals are being met and that funds are being spent in a timely manner.

The performance standards provide a measure for the City to evaluate each service provider's effectiveness, such as how well the service provider succeeded at:

1. Targeting those who need the assistance most;
2. Reducing the number of people living on the streets or emergency shelters;
3. Shortening the time people spend homeless; and
4. Reducing each program participant's housing barriers or housing stability risks.

Also, in order to successfully record performance outcomes, the CoC system requires that once a household is enrolled in a program, non-domestic violence agencies must complete an initial HUD Intake Assessment within the HMIS system. Performance outcomes are reported to the City using the HMIS generated ESG reports.

Domestic Violence Organizations will provide the same data utilizing their similar data systems.

(See Appendix K: ESG Written Standards)

# APPENDICES

## APPENDIX A – APPLICATIONS (SF 424) & ASSURANCES (SF 424D)

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

**4. Applicant Identifier:**

CA62850

**5a. Federal Entity Identifier:**

B-23-MC-06-0527

**5b. Federal Award Identifier:**

B-23-MC-06-0527

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Pomona

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

95-6000764

**\* c. UEI:**

QLK7V1HAF1J2

**d. Address:**

\* Street1: 505 South Garey Avenue

Street2:

\* City: Pomona

County/Parish:

\* State: CA: California

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 91766

**e. Organizational Unit:**

**Department Name:**

Neighborhood Services

**Division Name:**

Housing Services

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

Prefix:

Ms.

\* First Name:

Beverly

Middle Name:

\* Last Name:

Johnson

Suffix:

Title: Assistant Director

Organizational Affiliation:

\* Telephone Number: (909) 620-2433

Fax Number: (909) 620-4567

\* Email: beverly.johnson@pomonaca.gov

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Deveopment

### 11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

CDBG administration; CDBG public service programs/activities; CDBG non-public service projects

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,771,564.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,771,564.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:	<input type="text" value="Mr."/>	* First Name:	<input type="text" value="James"/>
Middle Name:	<input type="text"/>		
* Last Name:	<input type="text" value="Makshanoff"/>		
Suffix:	<input type="text"/>		

\* Title: \* Telephone Number: Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:



### Application for Federal Assistance SF-424

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		<b>* If Revision, select appropriate letter(s):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div> <b>* Other (Specify):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																	
<b>* 3. Date Received:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		<b>4. Applicant Identifier:</b> <div style="border: 1px solid black; padding: 2px;">CA62850</div>																			
<b>5a. Federal Entity Identifier:</b> <div style="border: 1px solid black; padding: 2px;">E-23-MC-06-0527</div>			<b>5b. Federal Award Identifier:</b> <div style="border: 1px solid black; padding: 2px;">E-23-MC-06-0527</div>																		
<b>State Use Only:</b>																					
<b>6. Date Received by State:</b> <div style="border: 1px solid black; width: 80px; height: 15px;"></div>		<b>7. State Application Identifier:</b> <div style="border: 1px solid black; width: 200px; height: 15px;"></div>																			
<b>8. APPLICANT INFORMATION:</b>																					
<b>* a. Legal Name:</b> <div style="border: 1px solid black; padding: 2px;">City of Pomona</div>																					
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <div style="border: 1px solid black; padding: 2px;">95-6000764</div>			<b>* c. UEI:</b> <div style="border: 1px solid black; padding: 2px;">QLK7V1HAF1J2</div>																		
<b>d. Address:</b>																					
<table style="width: 100%;"><tr><td style="width: 15%;">* Street1:</td><td style="border: 1px solid black; padding: 2px;">505 South Garey Avenue</td></tr><tr><td>Street2:</td><td style="border: 1px solid black; height: 15px;"></td></tr><tr><td>* City:</td><td style="border: 1px solid black; padding: 2px;">Pomona</td></tr><tr><td>County/Parish:</td><td style="border: 1px solid black; height: 15px;"></td></tr><tr><td>* State:</td><td style="border: 1px solid black; padding: 2px;">CA: California</td></tr><tr><td>Province:</td><td style="border: 1px solid black; height: 15px;"></td></tr><tr><td>* Country:</td><td style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</td></tr><tr><td>* Zip / Postal Code:</td><td style="border: 1px solid black; padding: 2px;">91766</td></tr></table>						* Street1:	505 South Garey Avenue	Street2:		* City:	Pomona	County/Parish:		* State:	CA: California	Province:		* Country:	USA: UNITED STATES	* Zip / Postal Code:	91766
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* Zip / Postal Code:	91766																				
<b>e. Organizational Unit:</b>																					
<b>Department Name:</b> <div style="border: 1px solid black; padding: 2px;">Neighborhood Services</div>			<b>Division Name:</b> <div style="border: 1px solid black; padding: 2px;">Housing Services</div>																		
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>																					
<b>Prefix:</b> <div style="border: 1px solid black; padding: 2px;">Ms.</div>		<b>* First Name:</b> <div style="border: 1px solid black; padding: 2px;">Beverly</div>																			
<b>Middle Name:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																					
<b>* Last Name:</b> <div style="border: 1px solid black; padding: 2px;">Johnson</div>																					
<b>Suffix:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																					
<b>Title:</b> <div style="border: 1px solid black; padding: 2px;">Assistant Director</div>																					
<b>Organizational Affiliation:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>																					
<b>* Telephone Number:</b> <div style="border: 1px solid black; padding: 2px;">(909) 620-2433</div>			<b>Fax Number:</b> <div style="border: 1px solid black; padding: 2px;">(909) 620-4567</div>																		
<b>* Email:</b> <div style="border: 1px solid black; padding: 2px;">beverly.johnson@pomonaca.gov</div>																					

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Deveopment

### 11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Homeless management information system, emergency shelter, outreach and program administration

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="159,204.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="159,204.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

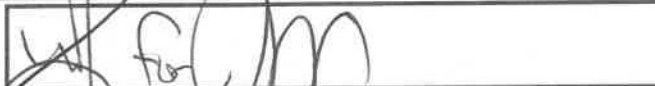
**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I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

☒ \*\* I AGREE

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

**Authorized Representative:**Prefix: \* First Name: Middle Name: \* Last Name: Suffix: \* Title: \* Telephone Number: Fax Number: \* Email: 

\* Signature of Authorized Representative:

\* Date Signed:

### Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

CA62850

5a. Federal Entity Identifier:

M-23-MC-06-0527

5b. Federal Award Identifier:

M-23-MC-06-0527

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

City of Pomona

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

95-6000764

\* c. UEI:

QLK7V1HAF1J2

**d. Address:**

\* Street1:

505 South Garey Avenue

Street2:

\* City:

Pomona

County/Parish:

\* State:

CA: California

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

91766

**e. Organizational Unit:**

Department Name:

Neighborhood Services

Division Name:

Housing Services

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

Prefix:

Ms.

\* First Name:

Beverly

Middle Name:

\* Last Name:

Johnson

Suffix:

Title:

Assistant Director

Organizational Affiliation:

\* Telephone Number:

(909) 620-2433

Fax Number:

(909) 620-4567

\* Email:

beverly.johnson@pomonaca.gov

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

\*

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Deveopment

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Program (HOME)

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

HOME administration; CHDO projects, single-family housing rehabilitation and first-time home-buyer assistance program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

38th

\* b. Program/Project

38th

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

07/01/2023

\* b. End Date:

06/30/2024

**18. Estimated Funding (\$):**

\* a. Federal

905,134.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

905,134.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

James

Middle Name:

\* Last Name:

Makshanoff

Suffix:

\* Title:

City Manager

\* Telephone Number: (909) 620-2314

Fax Number:

(909) 620-3707

\* Email: james.makshanoff@pomona.gov

\* Signature of Authorized Representative:



\* Date Signed:

08/09/2023

Community Development Block Grant  
ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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

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


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

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	James Makshanoff, City of Pomona
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Pomona	8/9/23



## Emergency Solutions Grant

### ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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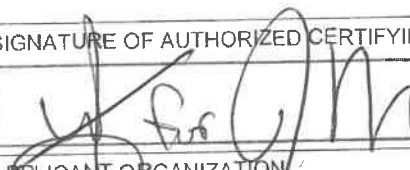
As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE James Makshanoff, City of Pomona
APPLICANT ORGANIZATION City of Pomona	DATE SUBMITTED 8/9/23

## HOME Investment Partnership Program (HOME)

### ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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

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

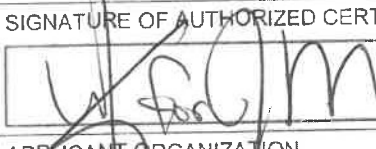
As the duly authorized representative of the applicant, I certify that the applicant:

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	James Makshanoff, City of Pomona
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Pomona	8/9/23

## APPENDIX B – CERTIFICATIONS

## CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

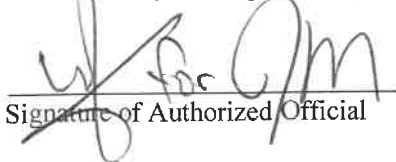
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

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

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

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

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

  
Signature of Authorized Official

8/9/23

Date

James Makshanoff, City Manager  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

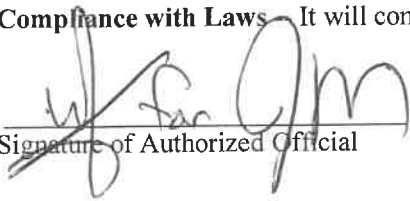
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** It will comply with applicable laws.

  
Signature of Authorized Official

8/9/23

Date

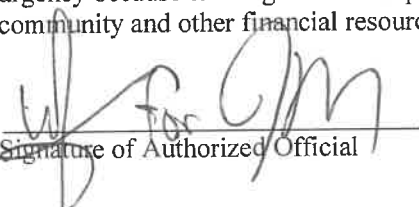
James Makshanoff, City Manager  
Title



## OPTIONAL Community Development Block Grant Certification

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

8/9/23

\_\_\_\_\_  
Date

James Makshoff, City Manager

\_\_\_\_\_  
Title

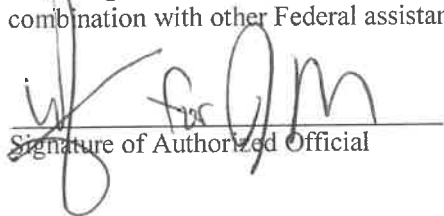
## Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

8/9/23

Date

James Makshanoff, City Manager

Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

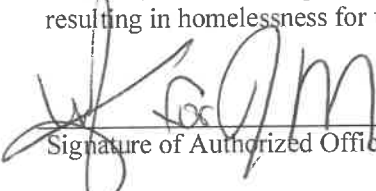
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature of Authorized Official

8/9/23

\_\_\_\_\_  
Date

James Makshanoff, City Manager

\_\_\_\_\_  
Title

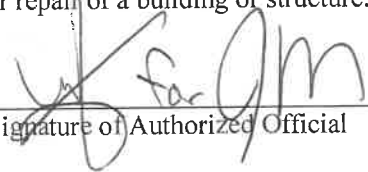
## **Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
\_\_\_\_\_  
Signature of Authorized Official

8/9/23

\_\_\_\_\_  
Date

James Makshanoff, City Manager  
\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## APPENDIX C – SUMMARY OF ANNUAL GOALS AND OBJECTIVES

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

Specific Annual Goals & Objectives		Eligible Activity	Priority Need Level (High, Medium, Low)	Source of Funds	2023-2024 Funding Amount	Performance Indicators	Year	Expected Number
GOAL 1: PROMOTE FAIR HOUSING OPPORTUNITY								
DH-1: Availability/Accessibility of Decent Housing								
DH-1.1	Availability/Accessibility to Decent Housing by providing housing counseling activities that assist low to moderate income persons resolve tenant/landlord disputes.	Fair Housing (Public Service)	High	CDBG	36,000	# of households assisted	2023	400
							2024	400
							2025	400
							2026	400
							2027	400
GOAL 2: EXPAND AFFORDABLE HOUSING SUPPLY								
DH-1.2	Availability/Accessibility to Decent Housing by working with CHDOs to produce housing units for low-to-moderate income persons.	CHDO Set-Aside	High	HOME	\$135,770	# of households assisted	2023	1
							2024	1
							2025	1
							2026	1
							2027	1
DH-1.3	Availability/Accessibility to affordable decent housing through homebuyer assistance	Mortgage Assistance Program	High	PHLA (State)	\$371,673	# of households assisted	2023	3
							2024	3
							2025	3
							2026	3
							2027	3
DH-1.4	Provide Affordability for Decent Housing by offering down payment and closing cost assistance to low-to-moderate income persons.	First-Time Homebuyer Down payment Assistance	High	HOME	\$500,000	# of households assisted; Number of first-time homebuyers; Number of households receiving counseling	2023	5
							2024	5
							2025	5
							2026	5
							2027	5
GOAL 3: CREATE AND PRESERVE AFFORDABLE HOUSING								
DH-1.5	Availability/Accessibility to Decent Housing by preserving existing housing stock through homeowner housing rehabilitation.	Homeowner Rehabilitation Loan Program	High	HOME	\$178,851	# of units rehabilitated	2023	2
							2024	3
							2025	3
							2026	3
							2027	3



**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

DH-1.6	Availability/Accessibility to Decent Housing by preserving at-risk housing through homeowner rehabilitation.	Homeowner Rehabilitation Loan Program	High	CalHOME (State)	\$202,000	# of units rehabilitated	2023	4
							2024	4
							2025	4
							2026	4
							2027	4
DH-1.7	Availability/Accessibility to affordable Decent Housing through homebuyer assistance.	Mortgage Assistance Program	High	CalHOME (State)	\$225,000	# of households assisted	2023	2
							2024	0
							2025	0
							2026	0
							2027	0
DH-1.8	Provide Affordability for Decent Housing by offering down payment and closing cost assistance to low-to-moderate income persons.	First-Time Homebuyer Down payment Assistance	High	HOME	\$500,000	# of households assisted; Number of first-time homebuyers; Number of households receiving counseling	2023	2
							2024	3
							2025	2
							2026	2
							2027	8
DH-1.9	Availability/Accessibility to Decent Housing by preserving existing housing stock through Lead and other Health Hazard mitigation and education.	Lead Hazard Control and Healthy Homes Grant Program	Medium	Lead Hazard Control Grant (HUD)	\$360,000	# of units rehabilitated	2023	24
							2024	15
							2025	16
							2026	16
							2027	16
DH-1.10	Availability/Accessibility to Decent Housing by preserving existing housing stock through an emergency repair program.	Housing Improvement Program (i.e. Emergency Repair, Façade Improvements)	High	CDBG	\$84,761	# of units rehabilitated	2023	5
							2024	5
							2025	5
							2026	5
							2027	5
DH-1.11	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income persons.	Rental Assistance	High	PHA-Section 8 (Includes VASH & VASH Project Based)	\$14,599,908	# of households assisted	2023	985
							2024	985
							2025	985
							2026	985
							2027	985
DH-1.12	Provide Affordability to Decent Housing by providing rental assistance and supportive services low-to-moderate income persons.	Rental Assistance	High	PHA-Section 8- Mainstream	\$405,357	# of households assisted	2023	0
							2024	63
							2025	63
							2026	63
							2027	78

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

DH-1.13	Provide Affordability to Decent Housing by providing rental assistance and supportive services low-to-moderate income persons.	Rental Assistance	High	PHA-Section 8-Emergency Housing Vouchers	\$1,149,408	# of households assisted	2023	0
							2024	0
							2025	0
							2026	0
							2027	0
DH-1.14	Availability/Accessibility to decent affordable housing through ADA/JADU	Rental Assistance	High	PHLA (State)	\$2,061,596	# of households assisted	2023	4
							2024	4
							2025	4
							2026	0
							2027	0
DH-1.15	Provide Affordability to Decent Housing by providing rental assistance and supportive services low-to-moderate income persons.	Rental Assistance	High	PHA-Section 8-Emergency Housing Vouchers	\$1,149,408	# of households assisted	2023	85
							2024	78
							2025	78
							2026	78
							2027	78
DH-1.16	Availability/Accessibility to decent affordable rental housing through new construction (PRISMA)	Rental Assistance	High	PHLA (State)	\$631,000	# of households assisted	2023	1
							2024	2
							2025	0
							2026	0
							2027	6
DH-1.17	Availability/Accessibility to decent affordable housing through ADU/JADU	Rental Assistance	High	CalHOME (State)	\$720,000	# of households assisted	2023	2
							2024	4
							2025	0
							2026	0
							2027	6
DH-1.18	Availability/Accessibility to decent and healthy housing by comprehensively addressing housing hazards	Healthy Homes Production Program	Medium	Healthy Homes Production Grant (HUD)	\$462,000	# of units rehabilitated	2023	60
							2024	20
							2025	20
							2026	20
							2027	20
DH-1.19	Provide Affordability to for a Suitable Living Environment by providing housing services, including housing counseling and case management in conjunction with HOME funded Programs.	Housing Services	High	CDBG	\$100,000	# of households counseled	2023	10
							2024	10
							2025	10
							2026	10
							2027	10

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

GOAL 4: SUPPORT HOMELESS ACTIVITIES								
DH-2: Affordability of Decent Housing								
DH-2.1	Provide Affordability for Decent Housing through homeless prevention assistance (rental/utility assistance and security deposits) to low-to-moderate income persons.	Homeless Prevention	High	ESG	\$0	# of persons served; Number of households	2023	0
							2024	0
							2025	0
							2026	0
							2027	0
DH-2.2	Provide Affordability for Decent Housing through homeless prevention assistance (rental/utility assistance and security deposits) to low-to-moderate income persons.	Rapid Re-Housing	High	ESG - City of Pomona	\$0	# of persons served; Number of households	2023	0
							2024	0
							2025	0
							2026	0
							2027	0
DH-2.3	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income persons.	Rapid Re-Housing (Porchlight)	High	CoC - LAHSA-RRH	\$1,002,329	# of households assisted	2023	50
							2024	65
							2025	65
							2026	65
							2027	65
DH-2.4	Provide Affordability to for a Suitable Living Environment by providing housing services, including housing counseling and case management in conjunction with HOME funded Programs.	Emergency Shelter	High	Measure H	\$1,460,000	# of persons served	2023	364
							2024	175
							2025	175
							2026	175
							2027	175
DH-2.5	Provide Affordability to for a Suitable Living Environment by providing housing services, including housing counseling and case management in conjunction with HOME funded Programs.	Emergency Shelter	High	Measure H/ CoC HHAP	\$912,500	# of persons served	2023	117
							2024	175
							2025	175
							2026	175
							2027	175
DH-2.6	Provide Affordability to for a Suitable Living Environment by providing housing services, including housing counseling and case management in conjunction with HOME funded Programs.	Emergency Shelter	High	ESG-CV	\$843,780	# of persons served	2023	175
							2024	175
							2025	175
							2026	175
							2027	175

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

DH-2.7	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income persons.	Homeless Prevention Rental Assistance	Medium	HOME TBRA	\$0	# of households assisted	2023	12
							2024	12
							2025	12
							2026	12
							2027	5
DH-2.8	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income persons.	Rental Assistance	High	CoC -HUD-PHA-City of Pomona - PSH (Permanent Supportive Housing)	\$2,129,641	# of households assisted	2023	80
							2024	80
							2025	80
							2026	80
							2027	80
DH-2.9	Homeless Management Information System data for low to moderate income persons homeless persons assisted	HMIS	High	ESG	\$51,712	# of households assisted	2023	175
							2024	175
							2025	175
							2026	175
							2027	175
DH-2.10	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income and homeless persons.	Rental Assistance	High	Emergency Housing Vouchers	\$1,149,408	# of households assisted	2023	85
							2024	78
							2025	78
							2026	78
							2027	78
DH-2.11	Provide Affordability to Decent Housing by providing rental assistance and supportive services to low-to-moderate income and homeless foster youth persons.	Rental Assistance	High	Foster Youth to Independence Tenant Protection Vouchers	Funds are included with HSV	# of households assisted	2023	3
							2024	3
							2025	3
							2026	3
							2027	3
GOAL 5: PLANNING AND PROGRAM ADMINISTRATION								
PA-5.1	Support Affordable and Decent Housing through Planning and Program Administration of Federal, State and Local Programs	Program Administration	High	CDBG HOME & HESG	CDBG \$ 354,313 ESG \$11,940 HOME \$90,513	N/A	N/A	N/A

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

GOAL 6: NEIGHBORHOOD PRESERVATION AND ELIMINATE BLIGHTED CONDITIONS								
DH-3: Sustainability of Decent Housing								
DH-3.1	Provide Sustainability of Decent Housing through Code Enforcement targeted at eliminating slum and blight in specific neighborhoods/areas.	Code Enforcement	High	CDBG	\$315,000	# of units inspected	2023	400
							2024	400
							2025	400
							2026	400
							2027	400
DH-3.2	Provide Sustainability of Decent Housing by preserving and restoring properties of special historic value for low to moderate income households	Historic Preservation	Medium	CDBG	\$0	# of housing units assisted	2023	0
							2024	0
							2025	0
							2026	0
							2027	0
GOAL 7: PROVIDE QUALITY PUBLIC SERVICES								
SL-1: Availability/Accessibility of Suitable Living Environment								
SL-1.1	Availability/Accessibility to a Suitable Living Environment through public services that benefit low-to-moderate income persons Citywide.	Public Services	High	CDBG	\$242,735	# of persons served	2023	1000
							2024	1422
							2025	1000
							2026	1000
							2027	1200
SL-1.2	Availability/Accessibility to a suitable living environment by providing emergency shelter operations to homeless low low-to-moderate income persons.	Emergency Shelter	High	ESG	\$95,552	# of persons served	2023	175
							2024	175
							2025	175
							2026	175
							2027	175
SL-1.3	Availability/Accessibility to a Suitable Living Environment by providing essential services to homeless low-to-moderate income persons.	Street Outreach	High	ESG	\$0	Number of persons served	2023	0
							2024	0
							2025	0
							2026	0
							2027	0

**APPENDIX C: Summary of Annual Goals and Objectives**  
(w/ Priority Need Levels)

**GOAL 8: IMPROVE PUBLIC INFRASTRUCTURE AND FACILITIES**

SL-1.4	Availability/Accessibility to a Suitable Living Environment by improving public infrastructure to benefit low-to-moderate income persons.	Infrastructure Improvements	High	CDBG	\$638,755	# of projects/# of persons in the area	2023	4
							2024	3
							2025	3
							2026	3
							2027	3
SL-1.5	Availability/Accessibility to a Suitable Living Environment by improving Parks and Facilities.	Facility/Park Improvements	High	CDBG	\$0	# Of projects/# of persons in the area	2023	0
							2024	0
							2025	0
							2026	0
							2027	0

**GOAL 9: EXPAND ECONOMIC OPPORTUNITIES**

**EO-2: Affordability of Economic Opportunities**

EO-2.1	Affordability of Economic Opportunities by repayment of a Section 108 Loan used to assist businesses.	Business Assistance	High	CDBG	\$0	# of business	2023	0
							2024	0
							2025	0
							2026	0
							2027	0

## APPENDIX D – CITIZEN PARTICIPATION PLAN



# CITY OF POMONA

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## CITIZEN PARTICIPATION PLAN For Consolidated Plan Documents

**ADOPTED**  
**1995**

**PREVIOUSLY AMENDED REVISED**  
**September 8, 2003**

**AMENDED**  
**October 17, 2016**

**AMENDED**  
**May 4, 2020**

### **Neighborhood Services Department**

Benita DeFrank, Neighborhood Services Director  
Beverly Johnson, Housing Services Manager



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## **CITIZEN PARTICIPATION PLAN**

### **I. Policy Statement**

It is the policy of the City of Pomona to provide for full involvement by the community and its residents in the planning, development, implementation and evaluation of programs funded under the Housing and Community Development Act of 1974, as amended, including the Community Development Grant (CDBG) Program, HOME Investment Partnership Act (HOME) and Emergency Solutions Grant (ESG) Program.

This Citizen Participation Plan sets forth the procedures and guidelines to be implemented by the City to provide for the continuing participation by the citizens of Pomona. The City acknowledges the need for, and the role, of citizen involvement, but also recognizes that the final determination and responsibility for policy development rests with the Mayor and the City Council.

This plan may be amended from time to time and shall remain in effect until superseded by a new plan or until the City no longer participates in programs that require such a plan.

### **II. Objective**

The Citizen Participation Plan, hereinafter referred to as the “Plan”, is designed to facilitate two-way communication between the City and its residents on matters pertaining to the use of Federal Grant funding from the U.S. Department of Housing and Urban Development (HUD). The Plan provides for visibility of housing and community development programs, enlists citizen participation in the development of the Consolidated Plan and the review of the Consolidated Plan, the Annual Plan, the Consolidated Annual Performance and Evaluation Report (CAPER) and the Assessment of Fair Housing (AFH). The Plan also encourages active citizen involvement in development of goals and objectives of federally-funded programs.

### **III. Definitions**

For purposes of the CDBG, HOME and ESG program, along with any additional federally-awarded entitlement grants, the following definitions will apply:

***Consolidated Plan Documents (CPD)*** – These documents include:

1. Five-Year Consolidated Plan
2. Citizen Participation Plan
3. One-Year Action Plan
4. Consolidated Annual Performance and Evaluation Report (CAPER)
5. Assessment of Fair Housing (AFH)

***Low and Moderate Income Households*** – Low and Moderate households are those households with income that do not exceed 80 percent of the Median Family Income (MFI) as defined below by HUD:

1. Extremely Low-Income: 0-30%, LA County MFI adjusted for household size
2. Very Low-Income: 31-50%, LA County MFI adjusted for household size
3. Moderate-Income: 51-80%, LA County MFI adjusted for household size

Income Limits are calculated using the same methodology that HUD uses for calculating the income limits for the Section 8 program, in accordance with Section 3(b)(2) of the U.S. Housing Act of 1937, as amended. These limits are based on HUD estimates of median family income, with adjustments based on family size.

#### **IV. Scope of Participation**

##### ***A. City's Role***

In order for citizens to become informed and involved in the program, the City will provide comprehensive access to program information. The following information will be made available during the planning process for program development and implementation of federal funds:

1. Amount of funds available;
2. Types of activities that are eligible for funding and activities previously funded;
3. Ineligible activities;
4. Dates of meetings and public hearings;
5. Information on the Request for Proposal (RFP) process for funding applications;
6. Process to be followed by the City in approving funding applications;
7. Preliminary project recommendations for City Council review and approval.

##### ***B. Citizen's Role***

All citizens of Pomona are encouraged to participate in the public meetings and hearings and to contact the City's Neighborhood Services Department – Housing Services Division with regard to any questions they may have concerning the process and programs under the Citizen Participation Plan, Consolidated Plan, Annual Action Plan, CAPER or Assessment of Fair Housing.

All public hearings take place in the Council Chambers located at City Hall, 505 S. Garey Avenue, Pomona, CA 91769, unless another location and/or time is publicized in advance.

A variety of mechanisms may be utilized to solicit input on priority needs, goals and objectives for the development of the Consolidated Plan. These include a community needs survey, public meetings/stakeholder focus groups, study sessions, agency consultations, telephone interviews and/or personal interviews. A least one public hearing will be held during the development of the Consolidated Plan.

Questions and comments may be addressed to:

Neighborhood Services Department – Housing Services Division  
505 S. Garey Avenue, Pomona, CA 91769,

Attn: Beverly Johnson, Housing Services Manager (909) 620-2433

### ***C. Planning Process for Documents***

Citizen involvement, as stated earlier, will be sought in the development, implementation and evaluation stages of Consolidated Plan documents. This will be accomplished in the following manner for each document outlined below:

#### ***1. Citizen Participation Plan***

##### ***A. Plan Development***

*Public Review and Comment* – The Draft Citizen Participation Plan will be made available for public review for 30 days. Written comments will be accepted during the 30-day public comment period. A summary of the comments and views, along with the City's responses will be attached to the Plan.

*Public Hearings* - A public hearing is not required, only reasonable opportunity to comment of the original citizen participation plan and on substantial amendments to the citizen participation plan, which must be made public. The City will publish a public notice informing citizens of a public review and 30-day comment period. The City may or may not hold a public hearing.

##### ***B. Plan Amendment***

*Public Review and Comment* – Substantial amendments to the Citizen Participation Plan will be made available for public review for a 30-day period. The City will consider any comments or view of residents in writing, or orally at public hearings, and a summary of all with the City's responses will be attached to the final amendment.

*Public Hearings* – A public hearing is not required, only reasonable opportunity to comment of the original citizen participation plan and on substantial amendments to the citizen participation plan, which must be made public.

## 2. Five-Year Consolidated Plan

### **A. Plan Development**

*Consultation* – Citizens will be invited to provide input into development of the 5-Year Strategic Plan, including identification of priority needs and setting goals and objectives, through any of the following mechanisms: community meetings/stakeholder focus groups, community needs survey, study sessions, public comment period and public hearing process. The City will consult with the following agencies:

1. Local and regional institutions
2. Continuums of Care
3. Public Housing Agencies
4. Other organizations (businesses, developers, non-profits, community-based organizations)

Outreach efforts to promote the on-line survey include: mailing postcards to over 43,500 city households, informing residents of community meetings/forums and requesting their input via the Community Needs Survey. Additional notification regarding the availability of the survey or meetings may include posting on the citywide Nixle-system, Facebook, Twitter and in newspapers.

*Public Review and Comment* – The Draft Consolidated Plan will be made available for public review for 30 days. Written comments will be accepted during the 30-day comment period. A summary of written comments and view, and the City's responses must be attached to the Consolidated Plan.

*Public Hearings* – Per Federal regulations at 24 CFR Part 91, at least two public hearings per year is required to obtain residents' views and to respond to proposals and questions.

The City will hold one public hearing to discuss all eligible project proposal and funding recommendations, and one public hearing to accept comments on the Draft Action Plan prior to final adoption which will be available for a 30-day comment period during the development stage.

### **B. Plan Amendment**

*Substantial Change* – The City will formally amend its approved Five-Year Consolidated Plan whenever a change constitutes a substantial amendment. For the purpose of the Five-Year Consolidated Plan, a "substantial change" is herein defined an activity not previously described in the Consolidated Plan or Action Plan and a substantial change to the purpose, scope, location or beneficiary of an activity. Additionally, any cumulative change equal to or in excess of 50 percent of the City's entitlement funds for that program year.

Changes in the allocation priorities not amounting to 50% of the entitlement will not be considered a substantial change to the Five-Year Consolidated Plan. As such, no public review and comment is required and documentation of the amendment will be made to the current Consolidated Plan, and notification of the amendment will be provided to HUD. All substantial amendments to the Consolidated Plan will be reviewed by, and must receive approval from the City Council.

*Public Review and Comment* – In the event that an amendment to the Consolidated Plan qualifies as a substantial change, citizens will be given an opportunity to participate in the planning process. This opportunity will be afforded to the citizens in the following manner:

1. Publication of Information for 30-day Comment Period; and
2. Adoption of change through public hearing process.

*Public Hearings* – Adoption and substantial amendment of the Consolidated Plan shall require a public hearing.

### 3. One-Year Annual Action Plan

#### **A. Plan Development**

*Consultation* – The City will consult with the following during the development of the Annual Action Plan:

1. Residents
2. Public and Private Organizations
3. Health Service Agencies
4. Fair Housing Agencies
5. Homeless Services Agencies
6. Continuums of Care
7. Other local governments
8. Public Housing Agencies

These persons/agencies will be contacted and included in the development process in the following manner:

1. Each year, the City will publish Notice of Funding Availability (NOFA) to each cooperating department and to non-profit community-based organizations advising them the planning cycle has begun for Consolidated Plan Grants (CDBG, HOME and HESG) and the proposals are being accepted.
2. The City will conduct outreach to special interest groups such as the elderly, at risk youth and the disabled, when necessary.

3. The City will review all proposals received and make recommendations to Council for funding awards.

*Public Review and Comment* – The Draft Action Plan shall be made available for public review for a 30-day comment period. Written and oral comments shall be accepted during this period and a summary of all will be attached to the Action Plan prior to final adoption.

*Public Hearings* - At a minimum, the City will conduct two separate public hearings at two different stages of the program year in order to address housing and community development needs. At least one of these hearings will be conducted before the proposed Annual Action Plan is adopted.

The City will hold one public hearing to discuss all eligible project proposal and funding recommendations, and one public hearing to accept comments on the Draft Action Plan prior to final adoption which will be available for a 30-day comment period during the development stage.

### ***B. Plan Amendment***

*Substantial Change* – The City will formally amend its Action Plan whenever a change constitutes a substantial amendment. For the purpose of the Action Plan, a “substantial change” is herein defined an activity not previously described in the Action Plan and a substantial change to the purpose, scope, location or beneficiary of an activity. Additionally, any cumulative change equal to or in excess of 50 percent of the City’s entitlement funds for that program year.

Changes in the allocation priorities not amounting to 50% of the entitlement will not be considered a substantial change to the Action Plan. As such, no public review and comment is required and documentation of the amendment will be made to the current Action Plan. All substantial amendments to the Action Plan will be reviewed by, and must receive approval from the City Council.

*Public Review and Comment* – In the event that an amendment to the Action Plan qualifies as a substantial change, citizens will be given an opportunity to participate in the planning process. This opportunity will be afforded to the citizens in the following manner:

1. Publication of Information for 30-day Comment Period; and
2. Adoption of change through public hearing process.

*Public Hearings* – Adoption and substantial amendment of the Action Plan shall require a public hearing.

3. Consolidated Annual Performance Review (CAPER) Development

**A. Plan Development**

*Public Review and Comment* – The CAPER will be made available for a 15-day public review and comment period prior to adoption. The City will accept comments and views received during the 15-day comment period, and City responses will be attached to the final CAPER.

*Public Hearings* – A public hearing will be held to receive comments on the Draft CAPER prior to final adoption and submission to HUD.

4. Assessment of Fair Housing (AFH) Development

**A. Plan Development**

The City will encourage participation by low income residents, including public housing residents, the Resident Advisory Boards, the Continuum of Care, local and regional institutions, and other organizations in developing and implementing the AFH.

*Consultation* – During the development of the AFH, the City will consult the following services/agencies to solicit their input on fair housing issues in the City:

1. Fair Housing Organizations
2. Other local governments
3. Advocacy groups for special needs households
4. Affordable housing providers
5. Bank and other financial institutions
6. Educational institutions

*Public Review and Comment* – A summary of the Draft AFH will be made available for public review for 30 days. Written comments will be accepted during the 30-day comment period. A summary of written comments and views, and the City's responses must be attached to the Consolidated Plan.

*Public Hearings* – The City will conduct at least one public hearing during the development stage of the Draft AFH to receive input on fair housing issues.

**B. Plan Amendment**

*Public Review and Comment* – The City will make HUD-provided AFH data and any other supplemental information the City plans to incorporate into its AFH to residents, public agencies, and other interested parties. A 30-day comment review period will be noticed and the amended AFH made available



at specific locations. A summary of the comments, views and City responses shall be attached to the final AFH.

*Public Hearings* – The City will conduct a public hearing to accept public input on fair housing issues during the development stage of the Draft AFH. The City will also conduct a public hearing to accept comments on the Draft AFH prior to adoption.

## **V. Public Notification**

### ***A. Public Hearings and Meetings***

Public hearings shall serve as a source of citizen input on proposed programs, activities, policies and procedures. At a minimum, the City will conduct two separate public hearings at two different stages of the program year in order to address housing and community development needs. At least one of these hearings will be conducted before the proposed Consolidated Plan and Annual Action Plan is adopted. All public hearings will be held in the Council Chambers, which are accessible to the handicapped/disabled.

To ensure that all City residents have ample opportunity to take notice of all scheduled public hearings, all notices regarding such hearings, including the date, time and location, shall be published in a local newspaper of general circulation at least ten (10) days prior to date of public hearing.

The Council may hold additional hearings as necessary for the Plan, evaluation and/or substantial amendments to the adopted Plan. All hearings will be noticed in the same manner as hearings for the Plan process.

Minutes of all hearings shall be kept by the City in accordance with its standard practice. Copies of minutes shall be available on request, in accordance with City's adopted practice.

### **Public Hearing Notices**

As stated above, in order to give adequate notice of public hearings, the City shall publish a legal notice in a newspaper of general circulation. In addition, all notices shall also be posted and/or available at City Hall. All legal notices shall be published ten (10) days prior to the hearing and shall contain the following:

1. Date of the Hearing
2. Time of the Hearing
3. Place of the Hearing
4. Topics to be considered

## **VI. Access to Meetings**

All public hearings will be conducted at the following location:

Pomona City Hall, Council Chambers  
505 S. Garey Avenue  
Pomona, CA 91766

City Council Chambers are accessible to the disabled. Citizens with a disability who need special accommodations in order to access program information must contact the Neighborhood Services Department, Housing Division at least 3 working days in advance with its **reasonable accommodation** request.

## **VII. Availability of Documents for Public Review**

Copies of the documents will be available to the public for review and comment at the following locations:

1. City Hall Offices, 505 South Garey Avenue, Pomona, CA, 91766, Housing Division, 1<sup>st</sup> Floor and City Clerk's Office, 2<sup>nd</sup> floor, Monday through Thursday 7:30AM - 6:00PM;
2. City of Pomona Library, 625 South Garey Avenue, Pomona, CA 91766, Monday through Thursday 1:00 PM to 7:00 PM and Saturdays 12:00 PM to 5:00 PM; Closed on Fridays and Sundays; and
3. City of Pomona Website, [www.ci.pomona.ca.us](http://www.ci.pomona.ca.us)

The City will provide a reasonable number of free copies of the documents to citizens that request copies. Notices of availability of draft documents for public review will be published as indicated in the appropriate section for that document.

## **VIII. Access to Records**

The City will ensure timely and reasonable access to information and records related to the development of the Consolidated Plan documents, and the use of monies for programs/activities funded with CDBG, HOME and HESG funds. Information to be made to the public will include budget and program performance information and comments received during the development of documents. Requests for access to information must be made to the City of Pomona City Clerk's Office in writing. Staff will respond to such requests within 15 working days or as soon as possible thereafter.

## **IX. Technical Assistance**

To help facilitate citizen input, the City will provide technical assistance, through its staff, to the community-wide and neighborhood associations and to groups of low-to-moderate income residents who request assistance.

### ***Limited English Proficiency (LEP) Assistance***

The City currently makes the following resources available at no cost to LEP individuals and families in order to provide meaningful access to the City's federally-funded programs and services:

#### **Oral Interpretation:**

Assistance may take the form of bilingual staff interpreters, volunteers, and telephone/electronic language assistance services:

- The City maintains a current list of bilingual staff that can provide interpretation and/or translation services in a variety of languages upon request.
- Use of the "I Speak" card to determine appropriate language needed
- Telephonic Interpretation through Language Line Service Inc.
- An interpreter will be made available at all meetings soliciting community participation or comment on federally funded programs.

#### **Written Translation:**

- Key program documents (brochures, application forms, public announcement) shall be translated by bilingual staff and/or outside translators as needed.
- The City of Pomona website is available in both English and Spanish and content may be translated into other languages at internet user's option using free online tools such as "Google Translate" (available at: <http://translate.google.com/#>) or similar translation services.
- Public announcements and program/service promotions are advertised in local papers including the Inland Valley Daily Bulletin, La Nueva Voz and the Inland Valley News.

#### ***Other Assistance***

Public hearings will be held in the City Council Chambers, which are accessible to the handicapped and disabled. Citizens with A disability who need special accommodations in order to access program information must contact the Neighborhood Services Department, Housing Division at least 3 working days in advance with its **reasonable accommodation** request.

Reasonable accommodation includes the following: providing materials in a different and/or larger typeface/font; providing materials in an alternative medium, and making special arrangements for meeting attendance.

**X. Anti-Displacement/Relocation**

In the event that residential displacement or relocation must take place in order to carry out a program or activity, the City will ensure that all affected persons are assisted according to an Anti-Displacement and Relocation Plan in connection with that project as applicable per Federal Regulations.

In the event that any acquisition and relocation must take place in order to carry out a program or activity, the City will also comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, and implementing regulations at 49 CFR Part 24.

**XI. Comments, Complaints and Appeals**

***A. Written Comments***

The City encourages the submission of views and written comments by citizens regarding the Citizen Participation Plan, Consolidated Plan, One-Year Action Plan and CAPER. The comments may be submitted to the Planning and Housing Department – Housing Division or at any public hearing conducted by the City Council.

The City will incorporate all written comments and responses into the Consolidated Plan. The City will respond to all written comments within fifteen (15) working days and state the reasons for the action taken on the proposal or view. All comments or views that were not accepted will be attached to the final plan, amendment or performance evaluation, along with the reasons why they were not accepted.

***B. Complaints/Grievances***

Citizens should be aware that any questions or grievances, regarding entitlement programs and projects can be submitted to the City's Planning and Housing Department – Housing Division located at 505 S. Garey Avenue, Pomona, CA 91769. During the actual development of the Consolidated Plan submission, written concerns or complaints regarding the Plan shall initiate a written response indicating assessment of the complaint and/or proposals and actions taken to address the complaints and/or proposals before final submission of the Plan to HUD as outlined in "Written Comments"-Section X. The City shall ensure that

reasonable attempts are made to respond to questions or complaints in a timely manner, usually within fifteen (15) working days after receipt of the inquiry.

In the event that the complaint is not responded to within the time frame, or is not addressed, or remains unresolved, citizens should be aware that questions or grievances regarding entitlement programs can be submitted to the Community Development Director for review. Such concerns or complaints can be submitted to the Community Development Director, 505 S. Garey Avenue, Pomona, CA 91769

If complaints are not addressed at the City level, citizens may forward such concerns or complaints to HUD. Although HUD will consider objections submitted at any time, such objections should be submitted within thirty (30) days of the submission of either the Consolidated Plan or Performance Report to HUD. Any written inquiries submitted to HUD should be addressed as follows: U.S. Department of Housing and Urban Development, Los Angeles Area Office, CPD Division, 300 N. Los Angeles Street, Suite #4054.

Objections submitted to HUD must meet one or more of the following criteria:

1. The description of needs and objectives are plainly inconsistent with available facts and data;
2. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant jurisdiction;
3. The submission does not comply with specific requirements or law;
4. The submission proposes the undertaking of ineligible activities.

**It is incumbent upon an objector to state clearly the grounds for an objection to the submission, or any other grievance or problem.**

### ***C. Appeals***

Appeals concerning Consolidated Plan documents, or recommendation of the staff should be addressed in writing to the following persons in order presented:

1. Neighborhood Services Director
2. City Manager
3. City Council
4. Los Angeles Area Office of HUD (if concerns not answered)

Address appeals to the appropriate person/department at:

Pomona City Hall  
505 S. Garey Avenue  
Pomona, CA 91766

## City of Pomona

### Citizen Participation Plan – Substantial Amendment

The following amendment language will be added to the City's Citizen Participation Plan to coincide with HUD waivers for emergency funding intended to assist in making a timely response to the impacts of the COVID-19 pandemic. The full text of the existing Citizen Participation Plan may be found at: <http://www.ci.pomona.ca.us/index.php/neighborhood-services-home/housing/community-development-block-grant-unit-cdbg>

#### I. Policy Statement

On March 27, 2020, Congress passed the Coronavirus Aid, Relief, and Economic Security Act or the "CARES Act". The Act identified additional funding for the Emergency Solutions Grant (ESG) Program and the Community Development Block Grant (CDBG) program to support preparation for and response to the community impacts of the COVID-19 pandemic. The 2019-2020 Annual Action Plan (AP) will be amended to incorporate additional funding in the initial phase (FY 2019-2020), and to describe the allocation for CARES Act funding in the CDBG and ESG Programs, and the reallocation of HOME Program Funds.

#### Summary of Citizen Participation Process and Consultation Process

The Substantial Amendment to the 2019-2020 Annual Action Plan (AP Amendment) addressing additional funding from the CARES Act will be available for a public comment period of 5 days per waiver of federal regulations. The draft Amendments to the 19-20 Annual Action Plan is available for comment from all interested members of the public from **Tuesday, April 28, 2020 to Monday, May 4, 2020**. The draft Plans and the public notice document are available for review on the City website at:

<http://www.ci.pomona.ca.us/index.php/neighborhood-services-home/housing/community-development-block-grant-unit-cdbg>

#### VIRTUAL PUBLIC HEARINGS

In response to the global COVID-19 pandemic and in accordance with California Governor's Executive Order N-25-20 regarding the Brown Act and guidance from the California Department of Public Health on gathering, please note that comments for PUBLIC PARTICIPATION or for a specific item on the agenda will be accepted by **email only**. Comments will be read into the record by the City Clerk. The deadline to submit your comments is by 6:00 p.m. on the day of the scheduled Council meeting. Please email your comments to [cityclerk@ci.pomona.ca.us](mailto:cityclerk@ci.pomona.ca.us) and title your email "Public Comment" along with the date of the Council meeting and indicate if you are commenting on a specific agenda item. All comments must be limited to 200 words.

## APPENDIX E – PUBLIC NOTICES

Inland Valley Daily Bulletin - LA  
3200 Guasti Rd. Suite 100  
Ontario, California 91761  
(909) 987-6397

0011597059

CDBG-CITY OF POMONA  
ATTN TO: ISABEL ABUNDI,  
HOUSING ANALYST, COMMUNITY  
OF DEVELOP. BLOCK GR 505 S.  
GAREY AVE  
POMONA, California 91769

**PROOF OF PUBLICATION  
(2015.5 C.C.P.)**

**STATE OF CALIFORNIA  
County of Los Angeles**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not party to or interested in the above-entitled matter. I am the principal clerk of the printer of Inland Valley Daily Bulletin - LA, a newspaper of general circulation, printed and published in the City of Ontario\*, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of County of Los Angeles, State of California, under the date of June 15, 1945, Decree No. Pomo C-606. The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

**04/14/2023**

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

Dated at Ontario, California

On this 14th day of April, 2023.



Signature

\*Inland Valley Daily Bulletin - LA circulation includes the following cities: [UNKNOWN LIST]

**CITY OF POMONA  
COMBINED NOTICE**

**10-DAY NOTICE OF A PUBLIC HEARING  
AND  
30-DAY COMMENT PERIOD**

**FOR THE DRAFT 2023-2028 CONSOLIDATED PLAN &  
2023-2024 ANNUAL ACTION PLAN**

**NOTICE IS HEREBY GIVEN** that the City of Pomona has prepared the Draft 2023-2028 Consolidated Plan and 2023-2024 Annual Action Plan as required by the U.S. Department of Housing and Urban Development (HUD). Copies of the Draft Plans will be available to the public for review and comment (see below for specific dates and locations). In addition, the City of Pomona Neighborhood Services Department will hold two public hearings on the following dates for the purpose of receiving public comments on the Draft Plans:

**PUBLIC HEARINGS**

**DATE:** Monday, May 1, 2023  
**TIME:** 7:00 PM  
**LOCATION:** Pomona City Hall Council Chambers

**505 South Garey Avenue  
Pomona, CA 91769**

**DATE:** Monday, June 5, 2023  
**TIME:** 7:00 PM  
**LOCATION:** Pomona City Hall Council Chambers

**505 South Garey Avenue  
Pomona, CA 91769**

**2023-2028 CONSOLIDATED PLAN SUMMARY**

Every three to five years, the U.S. Department of Housing and Urban Development (HUD) requires that Public Jurisdictions, receiving certain Federal funds, prepare a consolidated plan pursuant to 24 C.F.R. 91 which is to promote the framework for a planning process to identify housing, homeless, community and economic development needs.

The Consolidated Plan is a comprehensive analysis of housing and community development needs, including strategies to address those needs, and an action plan to implement programs that meet those needs. This single document consolidates the planning application, and reporting requirements of several programs overseen by HUD. For the City of Pomona, these programs include: the Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME) Program and the Emergency Solutions Grant (ESG) Program.

The primary objective of the CDBG Program is the development of viable communities, decent housing and expanding economic opportunities for persons of low-to-moderate income. The primary objective of the HOME Program is the creation and/or preservation of decent, safe and affordable housing. The primary objective of the ESG Program is shelter and services for the homeless.

**2023-2024 PROPOSED ONE-YEAR ACTION PLAN**

The proposed 2023-2024 Action Plan is based on the citizen input, consultation with community based agencies and City Council recommendations. To ensure citizen and stakeholder participation in the development of the Action Plan, outreach efforts included mailing informational postcards to over 43,500 households, informing them of community meeting dates and requesting their input via a Community Needs Survey. Community meetings were held virtually via ZOOM and in-person. Surveys were made available online at the City's website and at the City Hall Housing counter and many other high-foot traffic areas in the city. The Community Needs Survey was available on-line in English and Spanish beginning October 26, 2022. The final date for submission of the 2023-2024 survey was January 31, 2023. A total 429 surveys were received.

The Action Plan outlines the Federal resources available during fiscal year 2023-2024 and identifies priority needs, activities the City will undertake to meet those needs, and how activities to be undertaken meet Consolidated Plan goals, objectives and strategies.

**Resources Available for FY 2023-2024**

<b>Grant Fund Type</b>	<b>Amount</b>
CDBG	\$1,771,564
HOME	\$905,134
ESG	\$159,204



REVIEW PERIOD AND LOCATION OF COPIES OF THE DRAFT  
2023-2024 ANNUAL ACTION PLAN

Copies of the Draft Plans will be available to the public for review and comment beginning **May 1, 2023** through **June 5, 2023** on the City's website at <https://www.pomonaca.gov/government/departments/neighborhood-services/housing-services/community-development-block-grant-unit-cdbg> or at the following location:

§ City of Pomona City Hall Offices, 505 South Garey Avenue, during the following hours: Monday through Thursday 7:30 AM – 6:00 PM, at the following location:

▷ Neighborhood Services Department, Housing Division – 1<sup>st</sup> floor

**Written Comments**

Comments may be made before the public hearings, during the public hearings, within 30-days of the initial public notice, or until **June 5, 2023**. Written comments should be addressed to Beverly Johnson, Assistant Director, Neighborhood Services Department, P.O. Box 660, Pomona, CA 91769. Phone comments can be made at (909) 620-2433 or (909) 620-3772. TTY: (213) 894-8133 or Dial 7-1-1 (not available in all areas)

Council Chambers are accessible to the disabled. Those needing translation services or other accommodations may call Isabel Abundis at (909) 620-3772 at least 48 hours prior to the meeting.

**Published this 14<sup>th</sup> day of April, 2023 in the Inland Valley Daily Bulletin**  
**Inland Valley Daily Bulletin**  
**Published: 4/14/23**

## APPENDIX F – COMMUNITY NEEDS SURVEY RESULTS

City of Pomona  
Community Needs Survey

High Priority Responses	CW	D-1	D-2	D-3	D-4	D-5	D-6	TOTAL		
Priority Needs: Total Responses per District	184	49	38	54	43	26	35	429		
HOUSING										
First Time Homebuyer (down payment assistance)	114	27	23	37	26	14	20	261	61%	3rd
Fair Housing (tenant/landlord disputes, mediation)	110	32	26	33	30	15	16	262		
Tenant/Landlord Relations	103	29	24	28	29	13	14	240		
Affordable Housing (acq., rehab., new construction)	124	33	30	38	31	19	19	294	69%	1st
Special Needs Housing (senior, persons w/disabilities)	120	24	25	29	28	17	18	261	61%	2nd
COMMUNITY DEVELOPMENT										
Economic Development (job creation, new business)	139	36	28	42	35	22	25	327	76%	3rd
Code Enforcement (complaints, insp., corrections notices)	114	35	26	33	27	23	27	285		
Public Infrastructure (alleys, streets, streetlights)	150	43	30	43	38	26	30	360	84%	1st
Parks and Community Centers	147	40	32	43	38	23	25	348	81%	2nd
HOMELESS SERVICES										
Homeless Prevention	147	44	35	43	39	25	30	363	85%	1st
Street Outreach	137	39	31	38	34	21	28	328	76%	3rd
Emergency Shelter	147	40	31	40	33	20	28	339	79%	2nd
Rental Assistance	132	38	31	41	29	19	17	307		
Case Management/Counseling	130	35	31	39	35	23	24	317		
PUBLIC SERVICES										
Social Services (food bank, domestic violence, counseling)	156	36	33	45	30	22	23	345		
Youth Services (recreation, educational programs)	165	41	34	46	38	26	29	379	88%	1st
Senior Services (wellness, physical, nutritional programs)	152	40	29	43	34	25	27	350	82%	2nd
Health Services (dental, eye, counseling programs)	153	42	32	47	32	19	22	347		
Anti-Crime Program (community oriented policing)	137	46	34	44	34	25	29	349	81%	3rd
YOUTH PROGRAMMING IN POMONA										
I have children in the following age group(s):										
Early Childhood/ Ages 0-5	51	11	10	13	12	8	8	113	26%	2nd
Elementary/ Ages 5-12	99	21	14	16	18	12	9	189	44%	1st
Middle School/ Ages 12-15	35	4	6	10	8	8	3	74		
High School/ Ages 14- 19	39	8	10	13	9	4	7	90	21%	3rd
Transitional Age Youth (TAY)/ Ages 16-25	23	9	8	15	5	6	10	76		
Youth Programming is needed the most during:										
Summer	98	24	20	22	25	19	19	227	53%	1st
Before School	21	7	6	7	6	6	5	58		
After School	96	29	17	16	25	14	19	216	50%	3rd
Year -Round	109	22	19	20	24	8	15	217	51%	2nd
During the week	54	13	11	10	12	7	11	118		
Weekends	60	12	10	12	14	6	8	122		
I am interested in the following resources for my child(ren):										
Indoor Recreation	97	20	14	16	23	15	14	199	46%	3rd
Social Engagement	63	14	17	11	18	11	15	149		
Arts & Cultural Activities	95	29	20	19	28	13	17	221	52%	2nd
Tutoring/Homework Help	87	23	15	14	18	13	14	184		
Mentoring	62	19	14	10	16	12	14	147		
Health and Wellness	66	19	14	9	18	11	10	147		
Community Service/Service Learning	60	13	14	16	19	8	11	141		
Youth Leadership/ Civic Engagement	56	14	15	12	18	11	9	135		
Youth Focused Community Events	47	18	14	12	20	8	11	130		
Sports and Outdoor Recreation	107	25	21	21	25	19	16	234	55%	1st
Mental Health/Counseling	61	17	19	12	17	9	9	144		
Teen Programs	60	14	12	14	17	7	11	135		
Life Skills Classes	74	17	16	16	20	14	16	173		
Youth Employment/ Training	62	13	17	12	13	5	13	135		
STEAM (Science, Technology, Art & Math) Activities	79	22	16	18	19	21	15	190		
Programming for Youth with Disabilities	42	15	12	6	9	13	10	107		
Family Focused Programs	65	18	15	11	21	13	11	154		
Early Childhood (Age 0-5) Programs	55	13	9	14	10	10	8	119		

City of Pomona  
Community Needs Survey

FAMILY AND HOUSEHOLD RESOURCES								
	CW	D-1	D-2	D-3	D-4	D-5	D-6	TOTAL
MY HOUSEHOLD IS IN NEED OF THE FOLLOWING SERVICES/RESOURCES:								
Affordable Childcare	92	20	13	17	10	13	11	176
Rental Assistance	83	22	12	14	11	6	10	158
Mortgage Assistance	68	18	12	12	9	10	13	142
Utility Assistance	90	21	15	19	14	12	15	186
Homeless Prevention Assistance	65	17	15	15	10	10	16	148
Homelessness Intervention	57	17	14	14	14	7	12	135
Eviction Defense	41	13	5	8	4	2	9	82
Employment Assistance	71	22	12	6	9	6	12	138
Food/ Nutritional Assistance	79	22	18	14	8	10	14	165
Mental Health/ Counseling	70	16	16	13	14	11	15	155
Substance/ Addiction Services	54	12	8	13	10	6	10	113
Healthcare Access	63	16	14	12	15	8	14	142
Vaccination Access Information	38	11	6	13	6	5	11	90
Legal Services	59	14	7	14	7	8	12	121
Transportation Assistance	66	14	14	11	10	9	13	137
Reliable Internet Access	66	21	12	14	9	12	12	146
Financial/ Budget Counseling	62	13	11	13	9	11	14	133
Senior/ Elderly Resources	58	22	18	17	9	11	13	148
Family Recreation Activity	78	13	20	18	17	14	14	174
Parenting Classes	57	15	13	15	12	5	10	127

41% 2nd

43% 1st

41% 3rd

# APPENDIX G – HOME RECAPTURE/RESALE GUIDELINES

# **CITY OF POMONA RESALE AND RECAPTURE POLICY AND PROCEDURES FOR THE HOME PROGRAM HOMEBUYER ACTIVITIES**



## **PURPOSE/OVERVIEW**

Participating Jurisdictions (PJs) undertaking HOME-assisted homebuyer activities, including any projects funded with HOME Program Income, must establish written resale and/or recapture provisions that comply with HOME statutory and regulatory requirements. In the past, these provisions are set forth in the PJs Consolidated Plan. In addition, the terms of the resale and/or recapture provisions, the specific circumstances under which these provisions will be used (if more than one set of provisions is described), and how the PJ will enforce the provisions for HOME-funded ownership projects were to be reviewed and approved by HUD as part of the Annual Plan Process.

The 2013 HOME Final Rule now requires HUD to issue separate, written approval of the PJs resale and/or recapture provisions (*rather than the implicit approval during the Consolidated Plan/ Annual Plan Process*). The PJs must provide sufficient detail of its resale and/or recapture provisions to enable HUD to assess their appropriateness.

The purpose of this document is to describe the City of Pomona's Resale and Recapture policy and procedures for review and approval by HUD, and to provide guidance to City staff, contracted Developers/certified CHDOs, and potential homebuyers.

## **RECAPTURE PROVISIONS**

The City of Pomona uses the Recapture Provisions for its First Time Homebuyer Program. A first time homebuyer is defined as an individual or individuals, or an individual and his or her spouse, who have not owned a home during the three-year period before the purchase of a home, except that the following may not be excluded from consideration as a first-time homebuyer:

- A displaced homemaker who, while a homemaker, owned a home with his or her spouse or resided in a home owned by the spouse. A displaced homemaker is an adult who has not, within the preceding two years, worked on a full-time basis as a member of the labor force for a consecutive twelve-month period and who has been unemployed or under-employed, experienced difficulty in obtaining or upgrading employment and worked primarily without remuneration to care for his or her home and family;
- A single parent who, while married, owned a home with his or her spouse or resided in a home owned by the spouse. A single parent is an individual who is unmarried or legally separated from a spouse and has one or more minor children for whom the individual has custody or joint custody or is pregnant; and

- An individual or individuals who owns or owned, as a principal residence during the three-year period before the purchase of a home with City assistance, a dwelling unit whose structure is:
  - (i) not permanently affixed to a permanent foundation in accordance with local or state regulations; or
  - (ii) not in compliance with state, local, or model building codes and cannot be brought into compliance with such codes for less than the cost of constructing a permanent structure.

HOME funds are used for down payment and closing cost assistance for first time homebuyers whose incomes do not exceed 80% of the Los Angeles Area Median Income, adjusted by household size (otherwise referred to as “Low-Income”). City staff processes applicants on a “first-come, first-served” basis.

For HOME-funded programs, the applicable affordability periods per HOME investment is provided as follows:

Homeownership Assistance HOME amount per unit	Minimum Period of Affordability in years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

Based on the City’s program loan amount of \$100,000, the HOME period of affordability for the Program is 15 years. For purposes of establishing compliance with Program requirements, the HOME program’s affordability period is satisfied if the property remains to be the Participant’s principal residence for a period of fifteen (15) years from project close out.

**Recapture Triggers.** The recapture approach requires that the City of Pomona be repaid by the homeowner when the following occurs: property is sold, transferred, refinanced with cash out, a change in title occurs, default on loan, foreclosure, transfers in lieu of foreclosure, failure to use property as principal residence, or at the end of a fifteen (15) year affordability period.

**Recapture Amount.** Subject to recapture is the amount of assistance that enabled the homebuyer to buy the dwelling unit (“Loan Principal”), as well as any equity realized at the time of sale (“Equity Share”), after deducting the costs of sale and any eligible capital and curb appeal improvement costs, in proportion to the amount of the City loan provided. The Equity Share owed is prorated over the 15-year affordability period based on each full year of occupancy and compliance with the terms of the Loan Agreement.

**Eligible Capital and Curb Appeal Improvements.** Capital improvements are home improvements which increase the value of the property and are usually new and additional items that did not exist on the property. These therefore exclude items related to correcting building permit violations, items needed for regular maintenance, or improvements necessary due to deferred maintenance.

Capital improvements include, but are not limited to:

- Room additions
- Installation of central air conditioning system
- Patio additions
- Garage additions
- Item upgrades under the “existing non-conforming” uses under the City of Pomona Zoning code

Curb appeal improvements are improvements made that can be easily seen from the public street.

These include, but are not limited to:

- Roof replacements
- Fence/block wall replacements
- Professional landscaping/irrigation systems valued at \$1,500 or more
- Exterior painting
- Front door or front window replacements

Prior to constructing of any improvements, the City of Pomona must be notified and has to approve the proposed improvements to ensure that the improvements meet the intended definition. The City has sole discretion to determine if the improvements are eligible to receive credits. In addition, for improvements to be credited at the time of sale, the homebuyer must provide to the City the following documents: (a) before and after photos; (b) receipts from contractors indicating the work that were done, the name and address of the owner; (c) that the work done is by a licensed contractor; and (d) that appropriate permits were filed and approved by the City’s Building Department, when applicable.

**Recapture Amount Example.** Below is an example based on a hypothetical scenario, with the homeowner selling the property after 8 years of occupancy:

- (1) Original Purchase Price: \$300,000
- (2) Loan Amount: \$100,000 (33.33% of Original Purchase Price)
- (3) Improvement Credits: \$30,000
- (4) Appraised Value at the time the loan is due: \$450,000
- (5) Appreciated Value: (4) – (1) = \$150,000
- (6) Equity Share with Improvement Credits:
  - Step 1. (5) – (3) = \$120,000
  - Step 2. \$120,000 x 33.33% = \$39,996
- (7) Equity Share Reduction per Each year of Occupancy:  $\frac{(6)}{15 \text{ years}} \times 8 \text{ years} = \$21,331.20$
- (8) Total Amount Payable by Homeowner/Recapture Amount:  
(2) + [(6) – (7)] = \$118,664.80



**When Net Proceeds Are Insufficient to Cover City Loan.** In the event of foreclosure, transfer in lieu of foreclosure, or when the net proceeds of a sale are insufficient to repay the City loan due, the homebuyer shall be obligated to repay the City the net proceeds received by the homebuyer, if any, from the sale of the HOME-assisted property. The net proceeds from sale is the final amount that is given to the homebuyer as a result of a sale after any first mortgage and closing costs are subtracted from the sale price. Requests for short sales are evaluated by the City and the City maintains information in the client files, which documents that:

- 1) There will be no net sales proceeds;
- 2) The amount of the net proceeds was insufficient to cover the amounts due; and,
- 3) No proceeds were distributed to the homeowner.

**Enforcement.** HOME Written Agreements, and Covenants, Conditions and Restrictions (CC&RS) are executed prior to or at close of escrow that accurately reflects the recapture provisions, with the CC&Rs being recorded at the LA County Recorder's Office to enforce the use and affordability restrictions. In addition, prior to funding, potential homebuyers are interviewed by City of Pomona First Time Homebuyer Program Staff during which time the homebuyers are informed of the requirements under the CCR&Rs. Homebuyers must acknowledge their understanding of the Program requirements in the Interview Form.

## **RESALE PROVISIONS**

The City of Pomona is using Resale Provisions in the "Acquisition and Rehabilitation of Vacant Properties for Resale to First Time Homebuyers" Project with Shield of Faith Economic Development Corporation (SOFEDC), City's Certified CHDO, acting as DEVELOPER.

The City provides HOME funding to SOFEDC to acquire and rehabilitate vacant housing units for resale to a low-income first time homebuyer. The low-income first time homebuyer must occupy the HOME-assisted property as its principal residence for a period of 15 years (Affordability Period). The after-rehabilitation value or purchase price cannot exceed the HOME Homeownership Value Limits for Existing Housing, which is published by HUD annually and which can be accessed at <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/>.

To ensure affordability, the resale provisions require that each residential unit sold to eligible homebuyers is made available for subsequent purchase only to another "low-income" family having incomes at no more than 80% of the Los Angeles County AMI and who will use the property as their principal residence. In addition, that the price at resale must provide the homeowner a *fair return on investment* and ensure that the housing will *remain affordable to a reasonable range of low-income homebuyers*.

**Fair Return on Investment.** Fair Return on Investment is the return of the homeowner's original investment plus any eligible capital and curb appeal improvements, less the amount of deferred maintenance that does not meet the HUD Uniform Physical Condition Standards (UPCS). The Fair return

will use the percentage increase in the Consumer Price Index (CPI) for the Los Angeles-Riverside-Orange County area as published by the U.S. Department of Labor, Bureau of Labor Statistics. This is calculated by subtracting the CPI on the sale date from the CPI on the date of the initial purchase. That amount is divided by the initial CPI and multiplied by 100 to obtain the percent gain. The Fair Return on Investment will only apply to sales during the 15-year affordability period.

The UPCS is an inspection protocol that establishes minimum property condition standards for rehabilitation and includes a more comprehensive list of inspectable items and areas than Health, Quality and Safety (HQS) standards.

Below is an example based on a hypothetical scenario, with the homeowner selling the property after 8 years of occupancy:

- (1) Initial investment by low-income homeowner: \$5,000
- (2) Improvement Credits: \$30,000
- (3) Initial CPI: 246
- (4) CPI at date of sale: 265
- (5) Increase in CPI:  $\frac{(4)-(3)}{(3)} \times 100\% = 7.7\%$
- (6) Fair Return on Investments:  $[(1) + (2)] \times (5) = \$2,695$
- (7) Total Return to Buyer :  $(1) + (2) + (6) = \$37,695$

**Reasonable Range of Low-Income Homebuyers.** This term refers to subsequent homebuyers having incomes at no more than 80% of the Los Angeles AMI and who pays no more than 30% of the household gross income for housing cost (Principal, Interest, Taxes and Insurance ), as maybe determined by the Lender.

**Example.** The homeowner's original mortgage was \$285,000 at 6% interest for 30 years. The original homeowner is selling after 8 years. The example on Fair Return on Investments above will be used. The balance remaining on the first mortgage loan is \$236,851.

In order to realize a fair return to the original homeowner, the sales price must be roughly \$274,546:

First Mortgage Balance:	\$236,851
Total Return on Investment	<u>\$ 37,695</u>
Sales Price	\$274,546

If the original homeowners sets the sales price at \$274,546 and if current 2018 rates are used (front and back ratios, insurance and tax rates), the monthly Principal, Interest, Taxes and Insurance (PITI) is estimated at \$2,061.

A family with a household size of four having an annual income of \$77,500 could not support this PITI since it will exceed 30% of the family's gross monthly income. Most low income homebuyers would require down payment assistance. If down payment assistance is provided using additional HOME funds, a new affordability period will be imposed based on the level of the new HOME investment. If the family had savings and will be able to purchase the house without additional HOME assistance, the

affordability period would end in 7 years, after which time the subsequent homebuyer could sell the property to any buyer at any price.

**Enforcement.** An Agreement between the City of Pomona and SOFED has been executed that details the Resale Provisions. A Declaration of Developer Covenants is signed upon purchase of a property imposing the Resale Restrictions, which is recorded at the Los Angeles County Recorder's Office. Upon re-sale to a first time homebuyer and at close of escrow, the Homebuyer Covenants between the City, the SOFED and homebuyer is executed containing the resale provisions (*and the Developer Covenants is released by the City*).

**Termination.** The affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure, or assignment of an FHA insured mortgage.

**Process.** If Resale Provisions are to be triggered during the affordability period, the Developer and Homeowner must immediately notify the City of Pomona Housing Division staff. The City staff will: (a) Agree to the new sales price; (b) Confirm the fair return and equity sharing to the seller; (c) Review the income eligibility of the subsequent buyer and that the property will be used as their principal residence; and (d) Determine whether the subsequent homebuyer will require additional infusion and HOME funds and therefore extend the affordability period, or will continue the remainder of the affordability period in effect.



**FINAL VERSION:**  
The CDBG Eligible Census Tracts and Block Group Data is based on a combination of the 2010 Census Block Group boundary data and the American Community Survey (ACS) low mod data released February 2019.

## APPENDIX H – CDBG-ELIGIBLE AREA MAP



**FINAL VERSION:**  
The CDBG Eligible Census Tracts and Block Group Data is based on a combination of the 2010 Census Block Group boundary data and the American Community Survey (ACS) low mod data released February 2019.

## APPENDIX I – LISTING OF PROPOSED PROJECTS FOR 2023-2024



### FY 23-24 Proposed Projects

#	Project Name
1	ADMIN - CDBG Program Administration
2	ADMIN – HUD Section 108 Loan
3	Assistance League of Pomona Valley (Dental Center)
4	Assistance League of Pomona Valley (Operation School Bell)
5	Ayudar Foundation (Pathways to Success)
6	Bithiah’s Family Services (Mentorship Program)
7	Bright Prospect (Bright Prospect College Access and Success Program)
8	Catholic Charities of Los Angeles Inc. (Homeless Prevention Program)
9	Claremont After-School Program (Pomona After-School Scholars Program (PASS)
10	Foothill Family Shelter (Stepping Stones)
11	God’s Pantry (Senior Meal Delivery Program)
12	House of Ruth, Inc. (Housing Retention for Survivors of Domestic Violence)
13	Housing Rights Center (Fair Housing Services)
14	Inland Fair Housing and Mediation Board (Fair Housing Services)
15	Pomona Unified School District (JROTC @ Ganesha, Garey & Pomona High Schools)
16	PCS Family Services (Youth Diversion and Development)
17	PEARLS of Service, Inc. (On the Spot Essay Project)
18	UrbanMission Community Partners (South Pomona Food Hub)
19	CS - Enrichment Activities for the Elderly
20	CS - Pomona Music Program
21	NSD - CDBG Homeless Services
22	PD - Community Orientated Policing Program (CPOP)
23	NSD - Housing Improvement Program (HIP)
24	NSD - Housing Services
25	DS - Code Compliance Program
26	PW - ADA Path of Travel
27	PW - Street Improvements (FY 23-24 to FY 24-25)
28	PW-Streetlights - Citywide (FY 23-24 to FY 24-25)
29	ADMIN - ESG Program Administration
30	ESG Projects 2023
31	ADMIN - HOME Program Administration
32	HOME - CHDO
33	HOME - First-Time Homebuyer
34	HOME - Single Family Housing Rehabilitation





## APPENDIX J – SUMMARY OF PUBLIC COMMENTS

## **PUBLIC HEARING COMMENTS**

DATE: JUNE 5, 2023

### **No Comments**

## **PUBLIC HEARING COMMENTS**

DATE: MAY 1, 2023

### **Stephanie Roberts, Operation School Bell Program**

The support that the CDBG funds have continued to give us over the past few years has made a great difference to the young adults in Pomona. It helps us fulfill many more needs. We have been able to provide 2 pairs of jeans to the client. Sometimes the girls that we see like the jeans but they also like leggings to go along with it. And sometimes we found, especially this last year a real need for request for sweat pants as well for the comfort level. Other items include 6 pairs of socks, and underwear that we provide. And this year which was really needed was warm jackets which was really, really appreciated during the long winter. We have never given out as many jackets as we have given out this year. When we don't give out jackets, we provided hoodies or sweatshirts. The kids and young adults also get 5 T-Shirts which they get to pick from. The pandemic helped us the need to provide a variety of items and selections not previously addressed. Some of our clients needed the warm fuzzies. Others needed a variety of graphic and funny T-Shirts. Some wanted to match their older sister. Or have cute saying or items that said best mom or best dad. The pandemic also drove home the need to help the older kids form interest in soft flannel jackets, lavender sweatshirts were big for the girls. And some new jeans with the holes already in them, not purchased by CDBG fund though that is. Also, some slack for guys who needed nice clothes for job interviews came up that we never faced that before. These were items that we did not have on hand before, and now we do. We often receive calls from health assistance asking for emergency help because of dangerous situations, job insecurity, waiting to establish with financial support and many other reasons. We see the older child in the family bringing younger siblings in to get clothing for them and not wanting anything for themselves. But now we have extended items for younger adults and it feels so good to give a young man a nice warm coat and clothes to continue his education. Although our focus is to help children, by helping these children we support, the parents and entire family benefit. We had a father tell us last year, that his family had received wonderful items during an act of giving for his two sons, he said it hurt him to see his boys hanging their heads, and that year the first moment that he followed them to school, walked with them to school, he was a proud father. Thank you.

### **Roger Krechmery, Dental Center Program**

Council members my name is Roger Krechmery, and I'm speaking to you from on behalf the Dental Center Program, Assistance League of Pomona Valley. First I want to thank the Council and the City of Pomona for the support you have given us in the past. You have helped us help thousands of kids. Both in the clothing area and the dental area and we couldn't do it without you. And I want to compliment the staff that manages these programs. They are pretty darn good. Fact they are the best. So, you are familiar with the dental center program, I think, where we provide routine no cost routine dental care to members of the community. We have been doing this for over 30 years for children, and we have recently made a significant change in to extend the services to adults and seniors. We made that change

because of many requests from adult family members of the children we serve. Can you help us? And we use to say no. Well now we say yes. And boy did we get into it. We quick found out that affordable dental care for adults and seniors in the community is a very significant unmet need and it has been for many years. Most of the adults and senior patients that come to our center have not seen a dentist in 15 or 20 years. They have terrible problems. Many suffer from debilitating conditions every day well some programs are available to help this population, they simply don't provide enough coverage to enough people. So many are left with the need that they cannot afford to treat. We have transitioned from a children's only clinics to a family clinic. Our youngest patient this year was 5 years old. Our oldest patient 94 years old, even older than I am. 65 percent of our patients are now seniors. 2 years ago that percentage was virtually 0. So far this year we have seen 200 unique patients. And our way of making a difference. Just ask them, the ones that can now smile. Our typical younger patients require 1 or 2 appointments for their treatments. But the typical adult and senior patient requires about 8 to 10 some even more to treat the conditions that they have. They often require a partial or full dentures, and other appliances that are not needed for children. So what we got into, is the cost of treating the adult and senior patients is quite a bit more than the cost of treating children. All of this is just to say that we are continuing to meet significant community needs and we think this is one of them. And we are trying to engage more of our community and businesses to help find more resources to continue to allow us to expand. And that what we need. Thank you very much.

**Michelle Thompson, Bithiah's Family Services**

I'm Michelle Thompson, and I'm the executive director and founder of Bithiah's. We are a non-profit serving youth and foster care and their families, and we are heavily involved in the City of Pomona. We are actually 2 blocks down here on Garey. And well we are new to Pomona we have only been in this City for 2 years. We are not a new non-profit. We have been serving youth and foster care for almost a decade through residential treatment centers, tangible resources through our resource center. My favorite we have a visitation center. We work directly with the Pomona court house, right here. And DCFS Pomona and we provide visitation space for parents to visit with their children. In a connecting environment with foam pits and rock walls and free snacks, and we also provide free therapy to all of our community, through our MOU with Azusa Pacific and we are able to provide support groups, parent unification classes. We give tangible supplies when kiddos are brought in to foster care, social workers bring them to our resource center and they can get diapers, and outfits for that first night. And as an adoptive, foster mom, most of our staff our foster moms themselves, we know the need of tangible supplies, so Bithiah's applied for this grant this year because we are 100% donor and grant funded. And so our services are 100% free. We offer the courts these reunification classes, and these services and this visitation site and therapy and everything is free. And so we applied for this grant to keep us going a little bit longer. We do often apply for grants because all of needs are met strictly through our resource center. So I just want to come in and share a little about our organization and what we do because we are new to your donate here as an applicant. So thank you so much.

**Rachel Rosenbaum, Bright Prospect Program**

Thank you so much for the opportunity to be here. My name is Rachel Rosenbaum and I'm the development director of Bright Prospects. For those who might not be familiar with our organization, we are a college non-profit serving youth in Pomona, and our mission is to empower low-income, first generation students to gain admission to college, succeed, and ultimately graduate from college. We

have been serving high school and college student from Pomona Unified for more than 20 years. Our student population grows every year with more than 208,000 total students served 2022. This grant application will specifically fund our after school programing for HS students in grades 9<sup>th</sup> through 12<sup>th</sup> in PUSD. Our curriculum is comprehensive and rooted helping our students gain the tools to build positive, and proactive skills to navigate through HS. To learn about the impact of college and discover all of the options that are available to them. Students learn how to work as a team, supporting each other through challenges, ask for help, explore college majors and careers, and build confidence and leadership skills. They receive guidance in their college applications, essays and their FASFA and CA Dream Act applications. Going to college might be a little scary but every student, has the benefit of a bright prospect coach to know that they are not alone and to guide them every step of the way. The impact of this program can be seen from the success of the students. Last year we had 258 HS seniors in our program and all of them matriculated to college last fall. Our college students represent more than 100 universities across the country. Many of our students return to the Pomona community after they graduate and advance their careers across every sector. In fact many of our staff are Bright Prospect alumni and give back to Pomona with the services and support that they once received. I encourage the Council to join us in this work by supporting our grant application, so that we can continue providing our students with a life line to college access and economic mobility. Thank you so much.

**Jeanette Ellis Royston**

Did not wish to speak but submitted a speaker card in support of Public Hearing Item #12

**Alexandra Olivia, Community Life Commissioner**

Requested that City Council take into consideration the results from the Community Needs Survey when deciding which programs to fund with the CDBG Grant.

**Christina Jimenez, Community Life Commissioner**

Requested that City Council take into consideration the results from the Community Needs Survey when deciding which programs to fund with the CDBG Grant.

**SURVEY COMMENTS**

DATE: OCTOBER 25, 2022 - JANUARY 31, 2023

**HOUSING**

- Civil Legal Aid
- Homeless Shelter
- debt to income including bills
- Free youth sports program
- Retiring people need 60+ lot of money assistance and help etc.
- Married Senior
- green space ADA access to local park

- Help with upkeep for seniors for their homes.
- Safer driving speed limits. For example, orange grove Ave.
- Affordable rent
- LGBTQIA+ Friendly
- Provide specific area for homeless people.
- 1st time home buyer
- Why is the section 8 housing is 4-6 yrs. long wait?
- Solar discounts; road repair; thoughtful planning when adding medians so businesses don't suffer; and again road repair
- Street lighting and control for streets like orange grove where people drive fast/speed
- Homes are being renovated into 2 living spaces, most of the time during the late night hours, avoiding required permits. Negatively affecting single family home owners who follow city guidelines.
- Homes are being renovated into 2 living spaces, most of the time during the late night hours, avoiding required permits. Negatively affecting single family home owners who follow city guidelines.
- Take the prostitutes off Indian hill embarrassing when my family comes to visit
- Pomona is the most affordable city in LA County. Some of our landlords are operating slums and need to be put on notice.
- Create parking permit in neighborhood. The city is allowing too many houses to build ADU and its creating a parking nightmare. Therefore requiring family visiting to park a block or more away is NUTS!!!
- Improve businesses in area, too many vacant businesses.
- More ADU assistant for home owners to develop their homes
- Parks and open space
- Stop rent control and making landlords the enemy. We do not want to own rental property in Pomona due to bad policies.
- The homeless and drug problem needs to be addressed, driving down Holt makes it look like really bad neighborhood.
- Provide grants or low-interest funding to sole proprietor owners of 1-6 unit rental properties built prior to 1980 for repair/rehabilitation of those housing units.
- Housing is priority
- More services for kids with special needs in schools. An actual program specialized for those who are with IEPs or 504 plans. It cannot be the same as general education. Has to be a program that helps students learn and advance in their education, not limiting them because of what their diagnosis may be.
- NEED STOP SIGN ON WAYNE AND SCOVILLE!!
- 1530 W. 9th St. Pomona, CA 91706, 11/30/2022 To Whom this may concern, I am writing to discuss a few concerns having to do with city cleanliness, homelessness, and prostitute issues within our city. I moved to the city of Pomona from Glendora,

California with my two children and husband over the summer of 2022. I shortly after, accepted a position as an early childhood education teacher for PUSD. With extreme excitement in our hearts to live in this beautiful city, we were instantly discouraged as we took note of the excessive amount of litter within our city streets. This is seen daily specifically while driving down Mission St or Holt to name a few. Along with the overabundance of street litter, there is an extreme homelessness issue to be addressed. I wholeheartedly understand the magnitude of this issue, however writing in hopes of opening communication for possible solutions as this issue becomes more prominent on a daily basis. For example, while shopping at our local Walgreens on Holt today, a homeless woman entered the store, spontaneously ran up to a customer and began aggressively yelling at the customer within the store. This incident occurred in front of many customers, including children. The sales rep at the store made a comment to a coworker mentioning "She's back," as this issue seems to be a continued one within that location. I have been at local donut shops, gas stations, and many businesses where many homeless individuals have approached my children and I and acted irate. It is at a point where we unfortunately feel unsafe in the city, we were most excited to move to as we made the purchase of our first home. Lastly, the issue with prostitutes, specifically on Holt Ave. and surrounding streets. As mentioned earlier, I accepted a position at PUSD, daily, I observe under dressed women, exposing body parts walk down Holt Ave as I drive to work. Weekly, parents are mentioning having to be aware of their surroundings, and what time they walk near our school site to pick up their children from school due to the prostitutes in the area. This is most unfortunate as no one; specifically young children should be exposed to this. I am hoping to open communication with city leaders and find solutions to these city issues. As you can see, these issues are not only affecting new homeowners in the area, but many constituents and our overall economic growth in this city. By not treating this city with dignity, we are failing greatly. I have taken these critical issues earnestly and hoping you will as well. Look forward to a response, Melissa Zayas [veramelissa28@gmail.com](mailto:veramelissa28@gmail.com)

- Infrastructure, residential roads and street lights, schools, churches and slow down caution yellow signage.
- Environment
- Affordable prices
- Affordable construction of housing. You have an ADU construction loan program for low income only and to house low income only. I'm moderate income, but can't afford to convert my garage that I'd be willing to rent out through section8 voucher. Construction is too expensive.
- Infrastructure! Repair crumbling roads all throughout Pomona and deal with the homelessness issue which seems to be getting worse. It is making the city unsafe.
- Youth sports
- Affordable leasing space for small business

- Clean up of the city and homelessness.
- Homeless housing or relocation.
- Do more to get rid of the HOOKERS that walk down Indian hill and Holt every day. They are also now walking down residential streets where children play in front yards and have to ask mommy and daddy why that hookers look like that. Dressed in Thongs and bikini tops. This city is turning into to a trash can and city workers don't do anything about it.
- Programs for children and families that promote education and healthy living.
- We work with helping the community with food
- Affordable housing single mothers
- More low income housing/ expand section 8. You opened up sect 8 in March 2021, but when I asked when or what is my status, I was informed that a tenant "has to die" in order for us to get a section 8 voucher. Ridiculous!!!
- Trash pick-up and transient violence.
- Veterans
- Please do something about the homeless and the prostitution problem! This is out of control. I am a homeowner and I do not feel safe living in Pomona the homeless and prostitution is very visible the drug use and the gang activity. Holt is a joke as well as the park where they all hang out. you have hard working families who live in Pomona with children I wish we could walk around in peace without having to worry if we will be shot or attacked by the homeless
- Fixing pavements on streets
- First time home owners loans the way this economic it's hard to afford housing
- We need more incentives for middle class families who want to upgrade their historic homes and make their neighborhoods better. We need people like this to make Pomona better too. Expendable income.
- Get rid of the homeless and prostitution
- Home rejuvenation projects: rebates for paint/stucco, roofing, landscaping, etc.
- Housing that helps homeless transition off the streets.
- Recreation
- Mobile home improvement loans and grants
- House Maintenance, Homeowners / landlords need to be made accountable for the appearance of their home. This city will never grow or bring in business as long as it continues to look trashy. Start with cleanliness. Keep the streets, sidewalks and houses looking clean and I guarantee more people will move here and more business open in our city.
- Homeless services. Too many homeless on the streets. The capacity of the shelter does not meet the needs of the homeless population of our city.
- We need more funding for Nonprofits. The community leaders and nonprofit organizations are barely surviving. In order to be involved in humanitarian work,



resources must be available to all parties. All must be notified to have the opportunity to apply. oftentimes smaller organizations get lost in the shuffle

- Repairing our roads, especially the concrete portions of Towne and White. La Verne Ave after Garey is also in dire need of repairs.
- Housing for the elderly urgently
- Monitor abandoned houses as they become houses that other people break into and do illegal things or vandalize

## COMMUNITY DEVELOPMENT

- Everywhere
- Security Officers needed
- Government job outreach for youth.
- Homeless Clean up
- Parks and centers need uplift and maintenance
- Speed bumps on residential areas
- More buses to Chino, Eastvale for work and benches at Bus stops
- parks are needed district #1
- Safe and clean restrooms please!
- restrooms at parks available
- green streets
- Develop more sports program in community parks / centers for young people.
- Parks need to be remodel ted green, Palomares, Lincoln and Ganesha park. Restrooms are horrible. No toilet paper, nor soap. We never use those restroom due to over flooding and dirty toilets not working
- Trimming city trees in the neighborhoods! They are becoming dangerous and messy!
- Dog parks, Recreation centers, Daycare centers, Community centers
- Getting Cal trans to take care of their property along the freeway
- Pick up homeless off public businesses
- Remove street sweeping violations. The sign in front of my home is completely obscured with vegetation on city property. The police that enforce this area arrive prior to 8am and record the license of the cars, then at 8am, she issues the citation. I believe this is illegal.
- What happened to the \$3M for Ganesha Park?
- City code enforcement need to do their job and enforce City code.
- A toddler park
- Stricter laws for RV's not to park on residential streets.
- ADA walking paths
- Parks and open space

- Keep Pomona nice and do not encourage homelessness.
- More activities for active adults
- More activities for active adults
- Reinvest the money into the community fixing up parks and adding lighting to our streets and cleaning up alley ways, Make residential street parking by permit only property crime would decrease is there's active parking patrol ticketing cars that don't belong in the neighborhood.
- The alleys especially need repaving in D6 very neglected, we have enough parks, and we need a new D6 Council person Torres neglects everyone that is not next to Fairplex. The giant apartment complex on Bonita/Garey is too BIG and added tons more traffic to Bonita.
- Parks
- Creating a park for special needs kids would be great!
- NEED STOP SIGN ON WAYNE AND SCOVILLE!
- community and policing more friendly/ safety
- programs
- More community adult activity
- Repair crumbling roads!
- Our alleys in district 4 are in dire need of repaving! Also on the street San Bernardino Ave. and San Antonio cars speeding, reckless driving, and car accidents are overwhelming! I have lost (totaled) 4 cars just parked on the street hit by reckless drivers in the past 6 years! Speeding down San Bernardino Ave. is out of control THIS IS OUTRAGEOUS!!!!
- Please fix our alleys in district 4. Also there have been numerous accidents on San Bernardino Ave., near San Antonio, speeding reckless driving, and car accidents I have personally had 4 of my cars lost (totaled) just from being parked and reckless drivers running into my parked cars!
- Youth sports
- Community Gardens
- Attracting new businesses on foothill.
- Police took 15 minutes to respond to an attempted home invasion to my place of residence. Next time I would be better off defending myself with deadly force
- Community Centers for children and families
- We do food benefits
- Add doggy bags to city parks. Like Kellogg Park. Many people walk their dog but there are no doggy bags
- We need extra securities and cop at Olive Ridge apartment. We have lots of complains here
- Fix our roads and lights!!

- Stop signs with lights that are located in dark areas or dangerous areas traffic wise. Ex: Dudley St. and Arroyo Ave.
- like I said the community is a joke your representatives have been in office so long they are comfortable with the positions they hold and the education here is also a joke
- Improve street pavements. Arrow Highway, Park Ave, Holt Blvd and other major streets but also smaller neighborhoods need street improvements.
- I am tired of picking up trash on my street. Perhaps we need city trash cans?
- None
- Keeping parks clean and up to date
- We need more activities for seniors, children and teens for them to do. Somewhere to hang out.
- No more homeless or prostitution
- Build for places that would generate money by offering the city a place to have entertainment and recreational activities. Bowling alley, go-karting, Movie Theater, arcades, paint-balling, gun ranges. Fix up Palm Lake golf course or turn it into a dog park.
- Need to do something about all the vacant lots in Pomona. Land that could be put to good use just sits and sits while useable buildings get demoed for new construction. It does not make sense environmentally or economically.
- We need much better roads, weekly street sweeping, and a plan to have better public green spaces/medians.
- Dog parks, park maintenance better restrooms in parks, more water fountains, water fountains for dogs
- Flooding
- Parking availability
- None
- Home owners/ landlords need to be made responsible for the cleanliness of their properties! Houses need to be kept well maintained and cleared of any trash. Landlords should provide parking on property to help with street parking. The area where I live has almost no parking because all duplex houses with multiple families park on the street. My mortgage payment is almost 5k a month and I can't even park on my own street! We also don't get our street swept! Every Thursday morning cars flood the street and keep their cars there for over 3 days without moving. I've lived in my home 1.5 years and the street sweeper has NEVER cleaned our street!! Street lights on every street (both sides) to help lower crime rate. Can we fix the curbs as well?? They are falling apart by the day.
- All of our parks need to be remodeled, some of the structures are in bad shape. The parks need to be cleaned. We also need to continue improving our streets and alleys that are in real bad shape
- There should be more diversity in helping more of the African American population in Pomona. We realize the percentage rate is low compared to all the other ethnic groups. But government dollars are needed to offer more education, supporting our African

American cultural arts artists. I don't see any new black businesses. No black artist being recognized. No black council members I don't see community development

- Pomona needs new businesses such as warehouses and factories, but we should responsibly evaluate the impact that these businesses have on Pomona. We have too many vacant retail spaces that can also be used for other things. I also want to see Pomona's parks improved and some public hiking trails in the Ganesha hills and south Pomona areas.
- Community programs and community farms
- Network of protected bicycle lanes to schools, parks, Fairplex, and Pomona city center/downtown
- We need more large food stores in our city, we must have variety. Fix all the streets that have wells, and the alleys that are horrible with dirt. Make owners responsible for throwing away large objects. There are times when armchairs and chairs remain on the street for weeks that gives our city a very bad appearance.

## HOMELESS SERVICES

- Mental Health
- Help them invest in their future.
- Help for women with domestic violence.
- si
- Programs that help family when one or both parents need Housing.
- Mental outreach is important to city of Pomona
- Bring back the junior park ranger program
- Food programs for children after school programs.
- counseling
- mental health services food shelters
- homeless population
- Create a better facility for homeless people and provide work opportunities.
- Lots of homeless people, and human trafficking
- Find a workable solution to homeless encampments.
- Homeless center with showers Homelessness medical outreach
- Help them only if they stay sober
- Remove the homeless from the fronts of business, and properly. As tax payer, I would refuse to pay city tax if you cannot handle this disruption. I am Levi g this state soon, and this is a main reason why
- Gang/reentry programs
- Move homeless camping to emergency shelters

- Any service provider besides Volunteer of America/LAHSa. VOA are no longer the Baldwin Park provider for a reason. Unable to provide a proper program for homelessness. Invest in city workers to provide services in housed.
- Many homeless people appear to have mental illness, and/or substance abuse issues. Send them to get help and off our streets.
- Begin with clearing spaces like the car wash off of Garey, become a hot bed for transients and drugs. Feel unsafe walking around my neighbor hood
- Begin with clearing spaces like the car wash off of Garey, become a hot bed for transients and drugs. Feel unsafe walking around my neighbor hood
- Offer homeless assistance under the condition that they stay clean and try to turn their life around. You can't help those who don't want to be helped.
- Counseling would be great to teach people how to manage their money. I'm torn on giving rental assistance if they have a job, teach them how to balance income vs paying bills and rent. Or make counseling part of the deal to get rental assistance. Everything shouldn't be free. I've struggled and relied on food banks when I couldn't afford food but they required counseling to get the food handout too.
- Supportive Services such as Guaranteed Basic Income pilot program.
- Counseling is top priority
- Adding more street lights perhaps. Also in the other district I used to live in. Firefighters and ambulances, and police were aware that in my home there was someone loving with special needs so they wouldn't go in with loud siren. Here IHSS does not do that.
- NEED STOP SIGN ON WAYNE AND SCOVILLE!! ALSO YOU NEED TO DO SOMETHING ABOUT THE HOMELESS PROBLEM ON INDIANHILL!!
- Please don't invite more homeless here! Stop with all these services. Clean up Holt!
- This is a major issue in this city. Many homeless, mentally ill individuals.
- Law enforcement training on how to deal with homeless and/or a partnered task force that works with law enforcement to deal with homeless issues.
- District 4 has an enormous amount of homeless, but what needs attention are the HOOKERS that are constantly walking down Indian Hill Blvd. It's a shame to see this in our city and difficult to explain to my children when they ask "why is that girl walking in underwear"
- Homeless is a huge issue in district 4!
- Clean up encampments
- Free Housing for Houseless - Housing is a right
- Most homeless choose to be homeless. They rather do what they want and not have their rules to follow. Counseling does nothing but take money and give it to city government employees that are not doing anything to fix issues
- Transitional Housing
- Homelessness should be a top priority

- Please find mental health services to support the homeless. The numbers are increasing and people are living all over the streets
- You are not doing enough to protect Pomona residents from the chaos of the homeless people. They run rampant around the city late at night when we are asleep. They steal vandalize litter and destroy property. And what does the city and PPD say? "It's not a crime to be homeless"!! NO ONE FEELS SAFE IN POMONA
- Violence prevention
- The Hope homeless center employees are not doing their job correctly
- I did this survey a year ago nothing has changed
- All these programs to help keep the homeless off the streets and having access to services to help them. There seems to be an increase of individual homeless living on sidewalks.
- All this needs to be voluntary for the unhoused.
- Pomona shouldn't be the home of the homeless
- No prostitutes
- Mental health resources for individuals to transition. As well as job opportunities.
- Increase staffing of Heart Team
- Portable showers for homeless
- Homeless Outreach Coordinator. Someone who can help provide the resources they need.
- My charity is a 6x Award winning organization. That's been featured on FOX 11 News twice. Made front page headlines 3 times with the Daily Bulletin. Interviewed on major Radio and stations and graced magazines. Ms. Adams is a Philanthropic Powerhouse Our public service has provided assistance to hundreds. We have access to many professionals who work with us on several projects in the community, affordable housing has to be a priority, this creates more homeless in the community if there is no affordable housing and/or high paying jobs created
- I think that all homeless people in Pomona should be offered shelter nearby. I applaud the efforts of Councilman Torres during the Covid pandemic. He showed up and provided assistance to Pomona residents.
- Many of the homeless need help for permanent housing that should be the goal, not so many emergency shelters. You also have to have regulations not to camp anywhere, they are everywhere and more and more. Other cities send them to our city because they don't want them there. But we have to find a solution.

## **PUBLIC SERVICE**

- Senior Education Programs
- increased legal services (public defenders)
- Help the seniors need money. They or we deserve it.

- Help to promote trade schools to further education
- Sidewalks, street sweeping district #1 for better lighting.
- Bring back the junior park ranger program
- senior dance groups - exercise
- neighborhood water
- sharing with community all available programs
- No more police, they don't protect us.
- Need more police
- Prevention of drugs
- Authority's need to go speak in elementary, middle school and high school about building and consequences, no street guards available, lack of supervision of teachers and school meeting our children's needs.
- Pomona needs a better Senior Center.
- More reporting to prevent crimes
- Graffiti removal
- Drugs, prostitution and homeless are the major issues at hand. This circle is prevalent throughout the city yet police drive by and do nothing as there is no financial gain from it.
- Officers need to get out of their cars and do more foot patrols.
- Keep youth occupied in after-school programs that help them develop positively.
- The nicer neighborhoods to the north all have neighborhood watch programs
- Yes, we need more policing but I understand the state laws prevent anything from happening to those who constantly steal our mail & packages from our porches. At some point people will start to take matters into their own hands with these thieves and the punks to keep destroying our neighborhood streets/property with the car racing and reckless driving. How it is the racing punks are not being caught? They race Bonita Ave, Foothill and up/down Towne Ave & Garey Ave – it is one big circle they drive and never hear the cops. Why? Because this city is TOO BIG for what we have to police it. If you cannot manage this size city then divide us up into other surrounding cities.
- Anti-crime is top
- NEED STOP SIGN ON WAYNE AND SCOVILLE!
- Let the police do their jobs.
- crime stoppers
- We need more police presence for sure and community oriented policing.
- Our community needs more police presence.
- Youth sports
- Community Gardens are a public service. Allowing for increased access to healthy food and lowering crime rates
- Legal services

- More neighborhood watch programs. The city no longer trusts or relies on the police department for protection. We have to do it ourselves
- Trash pick up
- The prostitution issue on Holt needs to be addressed and solved
- I have not seen any different support programs in Pomona nothing has changed here
- Children activity programs to show them art / karate / defense classes
- Better cops who actually care
- Pomona parents need a safe places to take 0-5 age children like libraries and parks. Small children are like trees. A good root system needs to be established first so the tree can grow large and strong. Parks need to feel safe. Libraries need to be open in the morning.
- We should not continue putting massive amounts of our budget to the police department
- MORE FARMERS MARKETS
- There is obvious street prostitution going on in this city. Everyone knows you can find crime and prostitutes on HOLT AVE. Why is nothing being done? Have patrol cars on this street every night if needed until they get the point. This city will never grow to its potential if we keep looking the other way. Cleanliness is key!! Code Enforcement needs to step up their game. Where is all the Pomona money going???
- I love how there are more activities available for our children. Thank you for that, but we need to increase the options and schedule for sport classes. I work and not able to take my child to the classes that are offer. I would love to see ballet, gymnastics and cheerleading. Many of Pomona families go to other cities to enroll their children in those classes (with a non-resident fee).
- Crime of course is high. Unfortunately it comes with people who suffer from mental illness, depression, no job, no housing, no education, no goals or direction. A man without a vision is a man that's lost and left to cause chaos for others. Our youth would benefit from our great programs. The children are bored with the programs, so they lose interest fast. The attention span for a child is short, our goal is to keep them motivated and intrigued with each class & capture that spark for them to keep going and press forward. So many of our Pomona children are left out. The programs are offered, but the monies aren't there
- Pomona should have more parks and recreation centers for young people and families.
- Community food access via farms
- I appreciate that there are already more services for children in our city, but we still need more. I would like them to have dancing, gymnastics and other things for children of all ages.



**I am interested in my children accessing resources in the following areas: (Check all that apply)**

- Sexual health/pregnancy/STI prevention resources for teens. B) Integrate youth with disabilities to standard programs.
- The youth is the future
- No kids
- I don't have kids
- si
- Time Management skills, Financial Resources/ Financial Education
- District #6th parks are too far apart, green space is needed.
- Music programs
- swimming / water safety
- LGBTQIA+ support
- Safe driving and traffic rules program for 17 and up.
- Kiddos are the future and need a villa to assist them and needs met.
- What this city needs is a change in officials you are all too comfortable and you are doing a horrible job
- Fun activities for children to learn
- Volunteer work
- All of the above
- all must be in a safe area
- The youth is the future of tomorrow. We have to invest in them. The children need to learn proper etiquette. The way to address someone properly. It sounds basic until you seen them interviewing for a position.
- Music Programs
- How to grow food
- Focus on mental health
- Ballet, gymnastics, cheerleading throughout the city

**FAMILY AND HOUSEHOLD RESOURCES**

- translation services hotline
- Help seniors more they need all more attention. Invest more money into the retired people.
- calles muy sucias en Pomona, y necesitan limpiar los parques.
- Surveillance in homes of the elderly
- North green space Pomona has been forgotten for so long that is reason we need so much attention we have been behind too long.
- senior activities exercise for Palomares senior groups

- no
- LGBTQIA+ Friendly
- With everything going up in prices, we need better jobs, education, certification to make \$\$\$ to main a roof for the family.
- pet assistance- free pet clinics and lower the yearly permit
- Responding on behalf of tenants who reside in my small apartment building. I hope this does not disqualify me as a respondent.
- Need STOP SIGN ON WAYNE AND SCOVILLE!!
- All are very important to the community
- no one has done anything since last year
- All of the above
- It's struggle with gas prices and food so astronomically high. It's a strain on most of the families I talk to, Even with two incomes
- Community green space (farms and gardens)
- Kids needs to be met, education in Pomona is very low.
- Offer programs that teach kids how to be independent
- Youth football
- Youth Ambassadors. Maybe youth city council members
- Summer classes are imperative to keep the brain stimulated, can't lose sight of the goal. Year round to make sure the children stay busy and focused on the mission. No idle time.

## APPENDIX K – ESG WRITTEN STANDARDS

## **Pomona VIBRANT, SAFE, and BEAUTIFUL**

### **EMERGENCY SOLUTION GRANT (ESG) Written Standards**

Street Outreach  
Emergency Shelter  
Rapid Re-Housing  
Homelessness Prevention  
HMIS

## Emergency Solution Grant (ESG)

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## **POMONA ESG/COC**

### **Purpose**

The purpose of Hearth Act Funding, including the Continuum of Care Programs and the Emergency Solutions Grant (ESG) is to supplement State, local, and private efforts to address homelessness through rapid re-housing, street outreach, homeless prevention and emergency shelter. Federal funds such as COC and ESG are used to provide street outreach to the homeless, help operate shelters, provide essential support services to the homeless, and to help prevent at-risk families or individuals from becoming homeless.

### **Pomona's Mission**

To reduce the amount of homeless people living in the city. So, in January 2017 City Council formally adopted a strategic plan to resolve the homeless problem in the community "A Way Home": Community Solutions for Pomona's Homeless The City of Pomona will follow HUD's recommended guideline which is to identify sheltered and unsheltered homeless people, as well as those at risk of homeless, and provide the services necessary to help those persons to quickly regain stability and permanent housing after experiencing a housing crisis and or homelessness. A 24 hour Centralize shelter, using the housing first approach of Rapid Re Housing and providing Homeless prevention. In addition, the city also plans to build more affordable and stable housing to meet the housing needs in the community.

### **Grantee**

City of Pomona

Department of Neighborhood Services-Housing Division/Grants

505 S. Garey Avenue

Pomona, CA 91766

Phone: (909) 620-2368

Fax: (909) 620-4567

Website: [www.ci.pomona.ca.us/](http://www.ci.pomona.ca.us/)

## **Overview ESG/COC**

### **Emergency Solutions Grant Standards**

The City of Pomona (City) is responsible for coordinating and implementing a system-wide approach to meet the needs of the population and subpopulation experiencing homelessness within the City. Both the Emergency Solution Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the COC, in consultation with recipients of ESG program funds within the geographic area, shall:

- (1) Establish and consistently follow written standards for providing COC assistance;
- (2) Establish performance targets appropriate for population and program type; and
- (3) Monitor recipient and sub-recipient performance.

In accordance with Title 24 of the Code of Federal Regulations (24 CFR) Part 578, City of Pomona has developed the following written standards. These standards will apply to all projects that receive City, ESG funding and are intended as basic minimum standards to which subrecipients can make additions and/or enforce more stringent standards applicable to their own projects. In addition, all projects must comply with the Notice of Funding Availability (NOFA) under which the project was originally awarded and the Homeless Emergency and Rapid Transition to Housing (HEARTH) Act. All programs that receive ESG funding are required to abide by these written standards.

### **Overview of Hearth Act**

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, now the Emergency Solutions Grants (ESG) program. The HEARTH Act incorporated many of the lessons learned from the implementation of the Homelessness Prevention and Rapid Re-Housing Program (HPRP) into the new ESG program, including placing a stronger emphasis on homelessness prevention and rapid re-housing assistance.

### **SNAP Shot of HEART ACT**

- The Homeless Emergency and Rapid Transition to Housing (HEARTH) Act on May 20, 2009 amends the McKinney-Vento Homeless Assistance Act
- Changes allow for increased flexibility in who may be served and what activities may be carried out
- The HEARTH Act consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single

grant program and creates the Emergency Solutions Grant Program and the Rural Housing Stability Program.

- The focus changed from Homeless Shelter to Homeless Prevention.

## **ESG and COC Coordination/Collaboration**

In collaboration with other ESG service providers, these written standards have been developed by ESG recipients, including the LASHA, surrounding cities in LA county and Continuum of Care (COC) Membership. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Rapid Re-housing (R/R), and Homelessness Prevention (HP). The ESG Written Standards have been approved by the COC, the County, and City ESG recipients. These written standards will be reviewed and revised, at a minimum annually or as needed, to continue to build upon and refine this document.

## **Housing First Model**

Irrespective of the program type, HUD encourages ESG Recipients and the COC to implement a housing first approach when providing housing assistance. The housing first approach prioritizes rapid placement, stabilization in permanent housing, and does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). Transitional housing and supportive service only projects may also be considered when using the housing first approach if they operate with low-barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and for transitional housing projects do not require any preconditions for moving into transitional housing.

## **Universal Assessment**

All individuals will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). This tool guarantees that individuals' levels of need and eligibility determinations are made in an informed and objective manner.

## **Homeless Management Information System**

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG and COC Interim Rule (24 CFR 576 and 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

## **Data Sharing Requirement**

Data sharing is a multi-directional sharing relationship between multiple organizations. In order to systematically share data, the participating agencies must jointly establish a data sharing network formalized by the execution of guidelines, with the understanding they agree to the guidelines made by the HMIS Committee.



## **Agreements**

The City of Pomona (City) will enter into one a one year agreements with each sub-Recipient of ESG funding. In general; these agreements define:

- Key program components or activities (including benchmarks for success);
- The level of ESG funding;
- The anticipated source and amount of matching funds (24CFR 576.201) contributed by the agency/organization; and
- Documentation or reporting requirements. Receipt of Agreement and Terms

## **Record Keeping**

Sub-recipients must establish and maintain standard operating procedures for ensuring that the ESG program funds are used in accordance with the requirements of the ESG program. All records (or copies of records) containing information related to ESG program funds and activities must be retained and kept accessible for seven years after year funding was received. Records must include evidence of eligibility for each participant by eligible component (street outreach, RRH and or Homeless Prevention), income documentation, service records, Housing Quality Standards (HQS) inspections, rent reasonableness for each assisted unit, documentation of required matching funds, documentation of expenditures and evidence that required policies are in place.

Written procedures must be in place to ensure the security and confidentiality of all records containing personally identifying information of any individual or family who applies for and/or receives Emergency Solutions assistance.

## **Expenditure Limits**

Street Outreach and Emergency Shelter expenditures are capped as follows:

Combined Street Outreach and Emergency Shelter expenditures from each fiscal year's ESG grant cannot exceed the greater of:

- 60% of that fiscal year's total ESG grant award, or
- The amount of grant funds committed to Street Outreach and Emergency Shelter activities

## **Guiding Statutes, Regulations and Circulars**

Financial management of federal grant programs, including the ESG is governed by a set of requirements that are contained in the following:

- Provisions in law, as set out in statutes;
- Regulations, which interpret and amplify the statute and are set out in the Code of Federal Regulations (CFR);
- Office of Management and Budget (OMB) Circulars, which in some cases have been reissued as part of the CFR.

## **Financial Management**

Grantees and recipient in the ESG program must ensure compliance with regulations and requirements pertaining to the following key areas of financial management outlined in Financial Management Systems (24CFR 85.20 and 24CFR 84.20-28) for the following areas:

Usage of funds	Required funding match
Internal control	Budget controls
Cash management	Accounting controls
Procurement property	Asset control
Audits	

## **General Accounting System**

The purpose of 2 CFR Part 200 is to streamline the Federal Government's guidance on administrative requirements to more effectively focus Federal resources on improving performance and outcomes, while ensuring the financial integrity of the Federal programs in partnership with non-federal stakeholders (e.g., grantees and sub-recipients). OMB Circular 2 CFR 200 supersedes, consolidates, and streamlines requirements from eight (8) OMB Circulars: A-21, A-87, A-89, A-102, A-110, A-122, A-133, and A-50. Subrecipients are required to maintain a general accounting system. Accepted general accounting system includes:

- Cost Principals for State and Local Governments 2CFR Part 200
- Cost Principals for Non – Profit Organization 2 CFR Part 200
- Independent Single Audits - Recipients of individual or multiple Federal Awards that expend more than \$750,000 of federal funds with a one year period
- Records to be maintained for a minimum of three (7) years.

## **Accounting Controls**

Having accurate and comprehensive documentation of revenue and expenses is a regulatory requirement, and it is also a necessary part of a sub-grantee's organizational responsibilities. Accounting controls consist of procedures that enable sub-recipients of ESG funds to maintain accounting records that sufficiently identify the source and application of funds that flow through the sub-grantee's organization and, thereby, meet applicable standards. Most important of all, accounting records must be supported by source documentation.

## **Reimbursement Responsibilities**

Sub-recipients will be responsible to submit on a monthly basis a reimbursement request for qualified expenditures. The following must be included in the request as follows:

- Request cover page and summary page;
- Cancelled check or Bank statement;
- Invoice or Bill;
- Late Charges are not eligible;
- HMIS reporting for each service provided under the eligible component (Street Outreach, Shelter, RRH, Homeless Prevention)

The disbursement of ESG funds to the Sub-recipient shall be on a reimbursement basis only. There shall not be any advance or prepayment of funds.

Final reimbursement request must be submitted no later than the date specified on ESG agreement which is June 30th marking the end of City of Pomona FY.

## **Matching Funds Requirements**

The Sub-recipient must make matching contributions to supplement the Sub-recipient's ESG program in an amount that equals the amount of ESG funds provided by the Grantee. In other words, for every dollar provided through the ESG program, the Sub-recipient must contribute a dollar from another source to eligible ESG activities within the same funded programs.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources. Additional requirements apply to matching contributions from a federal source of funds as follows: the recipient must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match Emergency Solutions Grant funds. If ESG funds are used to satisfy the matching requirements of another federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

Matching funds must be provided after the date of that HUD signs the grant agreement.

## **Recognition of Matching Requirements**

In order to meet the matching requirement, the matching contributions must meet all requirements that apply to the ESG funds provided by HUD.

- The matching contributions must be provided after the date that HUD signs the associated grant Agreement;
- For cash match, "provided" means when the funds are expended (or when the allowable cost is incurred);
- For in-kind match, it is the date the service (or other in-kind match source) is actually provided to the program or project;
- To count toward the required match for the sub-recipient's fiscal year grant, cash contributions must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient;
- Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant;
- Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award may not count as satisfying the matching requirement of this section.
- The program participants served with matching funds must be entered into HMIS, and reported on the CAPER.

## Eligible Types of Matching Contributions

The matching requirement may be met by one or both of the following:

- **Cash contributions** – Cash expended for allowable costs of the sub-recipient, as defined in the Omni-Circular (2 CFR §200).
- **Non-cash contributions** – The value of any real property, equipment, goods, or services contributed to the recipient's or sub-recipient's ESG program, provided that if the recipient or sub-recipient had to pay for them with grant funds, the costs would have been allowable. Non-cash contributions may also include the purchase value of any donated building.

## Program Participant Records

In addition to the eligibility documentation required above, program participant records must include:

- documentation of the services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions where applicable, compliance with the termination of assistance requirement.

## Documentation of Homelessness

ESG sub-recipients are required to maintain adequate documentation of homelessness status to determine eligibility of persons served by the ESG program.

- A copy of this documentation must be maintained by the subrecipient in the client's or participant's file. Documentation includes 3-day notice to quit or pay, public agency written verification of homelessness, or self-certification of homelessness are examples of required proof to require and maintain in client file.

## Qualifications of Homelessness

A person is considered homeless only when he/she resides in one of the following places:

- In places not meant for human habitation such as a car, park, sidewalk, an abandon building, or on the street;
- In an emergency shelter;
- In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelter; or
- In any of the above but is spending a short time (up to 30 consecutive days) in a hospital or other institution.

## Monitoring and Site Visits

Monitoring can take a number of forms and can include review of progress reports, telephone consultation, and performance of on-site assessments. The three basic goals for oversight and monitoring of the progress and performance of ESG grantees/recipients include:

- Ensure that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met;
- Ensure compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities; and
- Enhance and develop the management capacity of grantees or recipients.

## **ESG/COC Reporting**

### Grantee Reports to HUD/LAHSA

Review of reports is a primary activity of monitoring ESG/COC project progress and performance of both HUD Field Offices and subrecipients. As the contractually responsible entity, Receipt should gather from subrecipient organizations various pieces of program and financial information on a regular basis. This serves not only to assist the recipient monitor the progress of recipient organizations funded by the allotment of Federal funds, but also to report on these activities to HUD and/or LAHSA. Reports are completed through use of the Integrated Disbursement and Information System (IDIS - described below and in Section Five of this Guide) as well as through annual reporting with the Consolidated Annual Performance and Evaluation Report (CAPER) and HMIS.

In the annual CAPER, for example, a jurisdiction funded with an ESG grant should report on the number of homeless persons provided with services through the ESG program during the year, and the types of activities which were funded by the program. Annual reporting to HUD is discussed more fully below in Subsection 6.3.

In IDIS and HMIS, the recipient reports the following project information:

- Number of participants in each recipients' ESG/COC project;
- Demographic information on participants receiving services (including race/ethnicity, age, sex, and families);
- Type of services and housing or other assistance provided by the recipient;
- Description of the beneficiaries of the project (such as mentally ill, runaway youth, battered spouse, etc.);
- Shelter type; and
- Other sources of funding to support the project.

Assessing subrecipient progress through these periodic reports allows the grantee to understand if the subrecipient is meeting program requirements, carrying out eligible activities and expending funds in a timely manner.

In order to obtain the information that is required in IDIS, the City of Pomona requires detailed reporting from every subrecipient of Federal funds. Reporting often occurs in conjunction with a recipient's request for reimbursement of eligible costs. At a minimum, recipient reporting to the grantee should occur on an annual basis, which is HUD's requirement for reporting accomplishments and the number and type of participants served by each ESG project. The design reporting format/form for recipients' match that of the IDIS required accomplishment data. This includes comprehensive information about program activities and meeting of

program goals is obtained across all recipient organizations. These reporting forms might include, for example, questions on the number of participants served in the immediately past reporting period, the types of services provided, and the number of clients to whom these services were delivered. Other information such as demographic characteristics of the participants should be gathered as well.

## **Participation of Homeless Persons in Policy-Making and Operations**

ESG regulation (24 CFR 576.405) require that recipients of Emergency Solutions Grant funds must provide for the participation of not less than one homeless or formerly homeless persons in a policymaking function within the sub-recipient's organization.

### **Homeless Participation Plan**

In order to involve [homeless](#) individuals and families, the City and/or its subrecipient will do the following when considering and making policies and decisions in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG:

1. Consultation through meetings for the Citizen Participation component in Development of the Consolidated Plan and Annual Plan.
2. Inclusion and Consultation through the Pomona Continuum of Care Coalition Meetings
3. Inclusion and Consultation through the Homeless Advisory Committee (HAC) Meetings
4. Inclusion on any Facility Oversight Board
5. Employment or Volunteer Services of Homeless Persons on ESG funded projects, including those involving the construction, renovation or operating of facilities

### **Termination of Participation and Grievance Procedures**

The City and sub-recipients may terminate assistance provided through ESG-funded activities to participants that violate program requirements. Written procedures must describe the specific program requirements and the termination grievance or appeal process; this should include the procedures for a participant to request a hearing regarding the termination of their assistance. The federal regulation at 24 CFR 576.402 describes the termination provision:

Termination of Assistance 24 CFR 576.402: Grantees and recipients may, in accordance with 42 U.S.C. 11375 (e), terminate assistance provided under this part to an individual or family who violates program requirements.

(a) **In general.** If a program participant violates program requirements, the recipient or sub-recipient may terminate the assistance in accordance with a formal process established by the recipient or sub-recipient that recognizes the rights of individuals affected. The recipient or sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

(b) **Program, participants receiving rental assistance or housing relocation and stabilization services.** To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reasons for termination;
  - (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
  - (3) Prompt written notice of the final decision to the program participant.
- (c) **Ability to provide further assistance.** Termination under this section does not bar the recipient or sub-recipient

## **Application Process**

Step 1: In accordance with HUD's recommendation under the under the housing first approach The City of Pomona will used the CES coordinating System -ESG participants will come through the 211 a coordinating Centralize System. When Homeless individuals or families call 2-1-1- Homeless families will access HFSS through LA county the county information and referral line. After calling 2-1-1, families or individuals will be referred to their closest family solution system (HFSS) to be assisted with ESG services.

## **ESG Evaluation Criteria**

- Assess shelter and other emergency needs
- Identify housing and service resources and barriers
- Evaluate vulnerability to prioritize for assistance (which may include evaluating risk and protective factors to make placements as effective as possible)
- Screen for program eligibility
- Facilitate connections to mainstream resources (including adult resources when appropriate)

Step 2: Participant will meet with a Case Manager to determine eligibility based on the duration of homelessness the participants will be placed into one of the following categories:

Category 1 Literally Homeless

Category 2 Imminent Risk of Homelessness

Category 3- Homeless under other Federal Statutes

Category 4- Fleeing/Attempting to Flee Domestic Violence.

Step 3: Once an EGS participant's homeless situation is determined the individual or family is placed into a component that addresses their needs

- Component: Emergency Shelter
- Component: Rapid Re-Housing.
- Component: Homelessness Prevention



Step 4: Line up with HUD's Housing First approach Model, the City of Pomona promotes a Housing First approach to solving homelessness.

## **ESG Program Eligibility**

Eligibility for assistance under the ESG program depends on the housing or homeless status of the participant. All participants in ESG-funded programs must meet the applicable definition of homelessness or at-risk. The specific status needed to be eligible for assistance varies depending on the program component under which a program is operated. Homeless status can be classified as one of four categories under the applicable HUD definition: "literally homeless," "imminent risk of homeless," "Unaccompanied youth and families with children who are defined as homeless under other federal statutes" or "fleeing/attempting to flee domestic violence." as defined within the definitions section of this document.

Homelessness prevention programs may serve those at *Imminent risk of homelessness* or *Fleeing/attempting to flee domestic violence* (with incomes below 30% of the area median income (AMI)) and are also allowed to serve households that meet the definition of "at-risk of homelessness" as defined within the definitions section of this document.

ESG-funded programs must document that the household would experience homelessness but for the ESG assistance (i.e. a household would require emergency shelter or would otherwise become literally homeless in the absence of ESG assistance).

## **Five ESG Eligible Components**

- **Street Outreach**
- **Emergency Shelter**
- **Homeless Prevention**
- **Rapid Re-Housing**
- **HMIS Component**

## **Street Outreach Component**

Subject to the expenditure limit in CFR 576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under CFR 576.2. Street outreach activities include:

### **Engagement**

The costs of activities to locate, identify, and build relationships with **unsheltered homeless people** for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

Eligible costs:



- Initial assessment of needs and eligibility
- Providing crisis counseling
- Addressing urgent physical needs
- Actively connecting and providing information and referrals
- Cell phone costs of outreach workers during the performance of these activities.

## **Case Management**

The costs of assessing housing and service needs, and arranging, coordinating, and monitoring the delivery of individualized services.

Eligible costs:

- Centralized or coordinated assessment system as required under CFR 576.401(a)
- Initial evaluation/verifying and documenting eligibility
- Counseling
- Developing/securing/coordinating services
- Helping obtain Federal, State, and local benefits
- Monitoring/evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing/service plan

## **Emergency Health Services**

Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campground) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

Eligible costs:

- Assessing participants' health problems and developing treatment plans
- Assisting participants to understand their health needs
- Providing or helping participants obtain appropriate emergency medical treatment
- Providing medication and follow-up services

## **Emergency Mental Health Services**

Outpatient treatment of urgent mental health conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campground) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

Eligible costs:

- Crisis interventions
- Prescription of psychotropic medications

- Explanation of the use and management of medications
- Combinations of therapeutic approaches to address multiple problems

## ***Transportation***

Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of eligible street outreach services

Eligible costs:

- Transporting unsheltered people to emergency shelters or other services
- Costs of a participant's travel on public transit
- Mileage allowance for outreach worker to visit participants
- Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes and maintenance for the vehicle
- Cost of staff to accompany or assist participants to use public transportation

## **Emergency Shelter Component**

Subject to the expenditure limit in CFR 576.100(b), ESG/Emergency Shelter funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelters for homeless families and individuals, and operating emergency shelters.

### **Essential Services**

ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter as follows:

### ***Case Management***

The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

Eligible costs:

- Using the centralized or coordinated assessment system
- Initial evaluation required under CFR 576.401(a), including verifying and documenting eligibility
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking

- Developing an individualized housing and service plan

## ***Child Care***

The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, or disabled children under the age of 18.

## ***Education Services***

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED) is eligible. Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

## ***Employment Assistance and Job Training***

When necessary for the program participant to obtain and maintain employment, services are available in assisting participants to secure employment and job training. Eligible costs include: classroom, online and/or computer instruction; on-the-job instruction; job finding, skill building; reasonable stipends in employment assistance and job training programs; books and instructional material; employment screening, assessment, or testing; structured job seeking support; training and tutoring, including literacy training and prevocational training; counseling or job coaching; and referral to community resources.

## ***Outpatient Health Services***

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing health problems and developing a treatment plan; assisting program participants to understand their health needs; providing or assisting program participants to obtain appropriate medical treatment, preventative medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

## ***Legal Services***

Legal services refer to necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing. Eligible legal services include: hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service; client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling; filing fees and other necessary court costs; child support; guardianship; paternity; emancipation; legal separation; resolution of outstanding criminal warrants; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking.

## ***Life Skills Training***

Life skills training involve the costs of teaching critical life management skills necessary for the program participant to function independently in the community. Eligible costs include: budgeting resources; managing money; managing a household; resolving a conflict; shopping for food and needed items; improving nutrition; using public transportation; and parenting.

## ***Mental Health Services***

Direct outpatient treatment of mental health conditions by licensed professionals.

Eligible costs:

- Crisis interventions
- Individual, family or group therapy services
- Prescription of psychotropic medications or explanations about the use of management of medications
- Combinations of therapeutic approaches to address multiple problems

## ***Substance Abuse Treatment Services***

Substance abuse treatment services provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors.

Eligible costs:

- Client intake and assessment
- Outpatient treatment for up to thirty days
- Group and individual counseling
- Drug testing

## ***Transportation***

Eligible transportation costs consist of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities; and costs of staff travel to support provision of essential services. Eligible costs include; cost of a program participant's travel on public transportation; mileage allowance for staff to visit program participants; and purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes and maintenance for the vehicle.

## ***Operations***

ESG funds may be used to provide **operations** costs to operate and maintain emergency shelters and provide emergency lodging when appropriate.

Eligible costs:

- Maintenance (including minor or routine repairs)
- Rent
- Security

- Fuel
- Insurance
- Utilities
- Food
- Furnishings
- Equipment
- Supplies necessary for the operation of the emergency shelter
- Hotel or motel vouchers for family or individual (only eligible when no appropriate emergency shelter is available)

## ***Renovation***

ESG funds may be used to renovate an emergency shelter.

Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The building for which ESG funds are used must meet state or local government safety and sanitation standards, as applicable and minimum safety, sanitation, and privacy standards per ESG interim regulations. The emergency shelter must be owned by a government entity or private nonprofit organization.

Eligible costs:

- Labor
- Materials
- Tools
- Other costs for renovation, including soft costs
- Major rehabilitation of an emergency shelter
- Conversion of a building into an emergency shelter

## **Homelessness Prevention Component**

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent individuals or families from becoming homeless. The annual income of the individual or family must be below 30 percent of median family income, must lack sufficient resources and networks necessary to retain housing and the assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing. The program participant's eligibility must be re-evaluated not less than once every three months.

## **Rapid Re-Housing Assistance Component**

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help **individuals or families living in shelters or in places not meant for human habitation** move as quickly as possible into permanent housing and achieve stable housing. The program participant's eligibility must be re-evaluated no less than once annually.

### **THE FOLLOWING REQUIREMENTS APPLY TO PROGRAM PARTICIPANTS ASSISTED THROUGH ESG FOR BOTH THE HOMELESSNESS PREVENTION AND THE RAPID RE-HOUSING ASSISTANCE COMPONENT:**

At re-evaluation the program participants' income must be at or below 30 percent of median family income.

## **Housing Relocation and Stabilization Services**

The subrecipient may set a maximum dollar amount and/or a maximum period of time (not to exceed time allowed per interim regulations) that all program participants may receive for each type of financial assistance. ESG funds may be used to pay the cost of providing the following services. (The following assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources.)

Eligible costs:

- Rental Application Fees (when charged by owner to all applicants)
- Security Deposit (no more than 2 months' rent)
- Last Month Rent (applies to the 24 month cap)
- Utility Deposits (when required by utility company for all customers)
- Utility Payments (up to 24 months of payment per service)
- Moving Costs (e.g., truck rental, moving company, up to 3 months storage)
- Housing Search and Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair (e.g. budgeting/money management)

## **Tenant Based Rental Assistance**

### **General Provisions**

For short-term and medium-term rental assistance, ESG funds may provide a program participant with up to 24 months of rental assistance during any 3 year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

- Short-term rental assistance is assistance for up to 3 months of rent
- Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent
- Payment of rental arrears consists of a onetime payment for up to 6 months of rent in arrears, including any late fees on those arrears
- Rental assistance may be tenant-based or project-based

## **Discretion to Set Caps and Conditions**

The subrecipient may set a maximum amount or a percentage of rental assistance that all program participants may receive, a maximum number of months that all program participants may receive rental assistance, or a maximum number of times that all program participants may receive rental assistance. The subrecipient may also require all program participants to share in the costs of rent. All units must meet Fair Market Rent requirements as established by HUD.

## **Use with Other Subsidies**

Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance through other public sources.

## **Rent Standards**

Rental assistance cannot be provided unless the rent is at or below the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. A complete listing of Fair Market Rents for Los Angeles counties can be found at:

[http://www.huduser.org/portal/datasets/fmr/fmr\\_il\\_history/select\\_Geography.odn](http://www.huduser.org/portal/datasets/fmr/fmr_il_history/select_Geography.odn)

For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority in which the housing is located.

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

The rental unit must meet minimum habitability standards found at 24 CFR 576.403.

## **Rental Assistance Agreement**

The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to

the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

For tenant-based, a rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

- The program participant moves out of the housing unit for which the program participant has a lease
- The lease terminates and is not renewed
- The program participant becomes ineligible to receive ESG rental assistance

## **Late Payments**

The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.

## ***Lease***

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for arrears, an oral agreement may be accepted in place of a written lease.

## **HMIS Component**

Homeless Management Information System (HMIS) is a locally administered, electronic data collection system that stores longitudinal person-level information about persons who access the homeless service system. The HEARTH Act makes the Homeless Management Information System (HMIS) participation a statutory requirement for ESG recipients and subrecipients. Victim service providers cannot, and legal services organizations may choose to not, participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.

Eligible Costs:

- Computer hardware, software, and software licenses
- Office space, utilities, and equipment
- Obtaining technical support
- Salaries for HMIS operation
- Staff travel to attend HUD sponsored or approved training
- Participation fees charged by HMIS Lead



## **General Restrictions**

Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

If the subrecipient is a victim services provider or a legal service provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data.

## **Administration**

Costs associated with the planning and execution of ESG activities including salaries, wages and related costs such as general management, oversight and coordination, monitoring, and evaluation.

The recipient must describe the performance standards for evaluating ESG activities which must be developed in consultation with the Continuum of Care (COC).

Based on standards and goals of the local Continuum of Care, the City is proposing the following performance standards for the Emergency Solutions Grant (ESG):

## Standards for ESG Eligible Components

### ***A. Standard Policies and Procedures for evaluating individuals and families eligibility for assistance under Emergency Solutions Grant (ESG).***

#### **Building on Established HPRP Policies and Procedures**

The policies and procedures were originally established based on the provisions of HPRP assistance. The policies and procedures are now modified based on the checklist of required elements applicable only set forth in 24 CFR 576.400 (e)(1) and (e)(3) (91.220 (4)(vi)) and in collaboration with COC standards will be adopted. These policies will be employed initially for the provision of ESG assistance, but will be refined as the new ESG program is implemented.

#### **Centralized Pre-Screening and Assessment Available at Multiple Locations**

(CES) Individuals and families applying for ESG assistance must complete an eligibility pre-screening form. Pre-screening may be completed via phone, online, or at established locations, including emergency shelter locations. Individuals and families who meet established pre-screening requirements will be scheduled an appointment with a case manager for assessment and eligibility documentation.

#### **Basic Eligibility Requirements**

- **Initial Consultation & Eligibility Determination:** The applicant(s) must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and appropriate type of assistance.

ESG clients must meet one of the following definitions of homelessness:

1. Literally homeless
2. At imminent risk of homelessness
3. Homeless under Federal Statutes
4. Fleeing/attempting to flee domestic violence

- **Income:** The household's total annual income must be below 30 percent of Area Median family Income for the area (AMI).

- **Housing Status:** Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self-certification of housing status will be considered on a case by case basis.

- **City of Pomona Residency:** All households receiving Homelessness Prevention or Rapid Re-housing assistance under ESG must be residents of the City of Pomona at time of application.

- **Unidentifiable financial resources and/or support networks:** In order to receive ESG rental financial assistance, applicants must also demonstrate the following:

1. No appropriate subsequent housing options have been identified;
2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

***B. Policies and Procedures for Coordination among Emergency Shelter providers, Essential Service providers, Homelessness Prevention and Rapid Re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.***

The ESG program requires coordination among participating agencies. All ESG sub-recipients in Pomona are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. Additionally, the project administration agreement with ESG sub-recipients will require coordination among agencies receiving ESG funds to administer Emergency Shelter, essential services, Homelessness Prevention, Rapid Re-housing services, and related assistance, and access to mainstream services and housing providers for clients.

**Participation in the Continuum of Care**

ESG funded agencies have easy access to membership in the Continuum of Care. The Continuum of Care has over 100 member organizations including homeless service providers, veteran service representatives, churches and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies. As the City uses both ESG and COC funding we will adhere to the COC established guidelines.

**Required Client Information and Referrals**

To further facilitate collaboration and information sharing, ESG funded agencies will be required to provide the following information and referrals to ESG program participants:

- 2-1-1 hotline for social services
- Social security benefits
- Cal-Works and other income security programs provided by The County of Los Angeles & Department of Public Social Services (DPSS)
- Cal-Fresh (formerly known as Food Stamps) assistance
- Low Income Energy Assistance Programs
- Affordable housing information
- Employment assistance and job training programs
- Health care and mental health services
- Services for victims of domestic violence
- Veteran services
- Specialized services such as legal services, credit counseling.

***C. Policies and Procedures for determining and prioritizing which eligible families and individuals will receive Homelessness Prevention assistance and which eligible families and individuals that will receive Rapid Re-housing assistance.***

Once it is determined that the household meets the basic eligibility guidelines noted above the household will be assessed for the appropriate form(s), level, and duration of financial

assistance. The results of this assessment will be formalized in a Housing/Financial Assistance Plan that is signed by both the applicant and the case manager.

#### **Homeless Prevention Assistance**

Homeless Prevention assistance will be targeted to households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. A risk assessment will be used to assess the household's level of crisis and prioritize those who are at greatest risk of becoming homeless. The Field Assessment Tool will include vulnerability criteria including but not limited to; income, housing history, food security, childcare, health care, life skills, and other special needs. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria, if the applicant(s) meet(s) eligibility and risk assessment criteria.\*

#### **Rapid Re-Housing Assistance**

Homeless Rapid Re-housing assistance is intended for individuals or families who meet the homeless definition described in Section 103, 42 USC 11302 of the McKinney Vento Act, as amended by the HEARTH Act. While there are many homeless individuals and families in the City of Pomona at any given night, the Rapid Re-housing assistance will be prioritized for households who are residing in emergency shelters and on the streets. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria.\*

*\* Rapid Re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being.*

***D. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Re-housing assistance.***

#### **Limitations on Assistance - Homeless Prevention**

The City's ESG rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness or who are at imminent risk of becoming homeless. For Homeless Prevention assistance, the rental assistance consists of short term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). The total maximum length of assistance is 12 months over a 3-year period. Client must be reassessed after every 90 days and case management on a monthly basis is **required**.

Not every individual or family in need of rental assistance is a candidate for ESG Homelessness Prevention or Rapid Re-housing assistance. ESG rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but rather a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

As a general rule, an individual or household should pay approximately 30% of their income towards rent. This requirement may be waived on a case-by-case basis for extreme circumstances. The ESG assistance will consist of the remaining portion of the rent, up to \$1,000 (excluding the clients' contribution towards the rent).

Clients are required to be reassessed at regular monthly intervals to monitor progress and levels of self-sufficiency. If a client requires assistance beyond the three month mark, the ESG rental subsidy will be reduced and the client will be required to pay a larger portion of the rent. Homelessness Prevention assistance will be based on number in household, fair market rent rate, and income to determine for a maximum one year over a 3-year period.

## **Limitations on Assistance - Rapid Re-Housing**

Under Rapid Re-housing assistance, a client's share of rent should be based on the client's ability to pay during their path to housing stabilization. Clients receiving Rapid Re-housing assistance must be re-assessed, at a minimum every 90 days, and reviewed during monthly case management. The maximum length of Rapid Re-housing assistance will be one (1) year\* during any 3- year period. The assistance should not exceed the **Fair Market Rent** amount based on client household, except for the first month of assistance if client requires assistance with other re-housing expenses such as rent deposits or utility deposits. Security deposit should not exceed two times the rent.

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- 100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with Rapid Re-housing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the **Fair Market Rent limit**, established by HUD;
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

**Note:** Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (CFR 576.106).

## **Limitations on Assistance - All Clients**

Due to the limited amount of funds available, the ESG assistance will not exceed **Fair Market Rent (FMR)** per client per month in combined ESG assistance, including rent and utility payments. The ESG Program Interim Rule allows short- and medium-term rental assistance to be provided to eligible program participants only when the rent, including utilities (gross rent) for the housing unit.

## **Fair Market Rents in Pomona**

Fair Market Rents, often abbreviated as FMR, can be used to better understand the average housing costs of an area. Notably, Fair Market Rents are used to establish the payment standards for the Housing Choice Voucher Program, maximum rents in HOME financed rental projects and initial rents for Section 8 project based assistance.

### ***E. Standards for determining how long a particular participant will be provided with rental assistance and whether the amount of that assistance will be adjusted over time.***

ESG assistance consists of short term (up to 3 months), medium term (up to 6 months), and maximum term (up to 1 year) rental assistance to allow individuals or families who have recently encountered a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the program consists of temporary assistance aiming at rapid stabilization of households, clients are required to contribute a portion of their income towards rent. Clients with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the ESG assistance expires.

Clients assisted under ESG Homelessness Prevention assistance are eligible to receive the rental assistance for up to 3 months if they meet income eligibility of less than 30% of the area median family income (AMI) during the 3 month period and comply with the case management requirements of the program. At the end of the third month, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3 month period. If the ESG rental assistance is extended for an additional three (3) months, the ESG assistance will be reduced and/or adjusted over the remaining time. City of Pomona, Clients assisted under ESG Rapid Re-housing Assistance are eligible to receive rental and utility assistance for up to one-year if they meet income eligibility during the one-year period. Rapid Re-housing clients **must** receive monthly case management, be evaluated at regular intervals, and be re-assessed every 90-days during the ESG assistance period. The ESG rental assistance should be reduced gradually and the client's portion of rent increased during the months of assistance.

### ***F. Standards for determining the type, amount, and duration of housing stabilization and /or relocation services to provide a program participant, including the limits, if any, on homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance; maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.***

#### **Reasonableness Determination**

The City will set the maximum amount of assistance to be provided to Homelessness Prevention and Rapid Re-housing clients on an annual basis. The City will also determine if the total benefit amount to be awarded to any one client is both reasonable and necessary.

#### **Reporting - Centralized/Coordinated Assessment System**

- The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and subrecipients. The City and the sub-recipients work with the Continuum of Care to ensure the

screening, assessment, and referral of program participants are consistent with the written standards.

- The recipient will ensure that data on all persons served and all activities assisted under ESG are entered into a community-wide HMIS in the area in which those persons and activities are located.
- Victim service providers cannot, and Legal Services Organizations may choose to not participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.

Eligible Cost includes, but is not limited to the following:

- Hard ware, Equipment and Software Costs
- Staffing: Paying salaries for operating HMIS
- Training and Overhead - Technical support, leasing space, and utilities for space used by HMIS staff.

## **Comparable Database for Victim Services**

If the sub-recipient is a victim services or a legal services provider that use a comparable database, it may use ESG funds to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

## **Case Management**

The City has defined case management as a “collaborative” process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet the client’s health and human service needs. It is characterized by advocacy, communication, management focuses on housing stability and placement, with an emphasis on the arrangement, coordination, monitoring, and delivery of services related to housing needs and improving housing stability.

A meeting with a case manager is required in order to receive Rapid Re-housing assistance, although it is not necessarily the first step. Some communities might have a screening, intake, assessment, or other eligibility determination process that precedes the assignment to a case manager while other communities may have case managers performing the eligibility task.

Regardless of the arrangement, the meeting with the case manager should be regarded not only as a program requirement, but also as an early opportunity to help a household improve its housing stability during and beyond the period of Rapid Re-housing assistance.

## **Transitional Housing and Rapid Re-housing (HUD says do not used ESG funds for Transitional Housing)**

While transitional housing is technically eligible, HUD cautions recipients against using ESG Rapid Re-housing funds as a way of regularly exiting a person from transitional housing to permanent housing. It is recommended that Rapid Re-housing be used as a model for helping people move from the streets or shelter to permanent housing, not for people exiting transitional housing. Additionally, transitional housing providers should have programs



designed to successfully exit people and should not use Rapid Re-housing, another form of temporary assistance, as a regular part of their program design. HUD recommends this be done on a case-by-case basis, so that it is not common practice, but is provided only when necessary to prevent the program participant from going back to the streets or emergency shelter.

Please also note that program participants would need to be assessed for and determined to be eligible for ESG Rapid Re-housing assistance, in accordance with the ESG eligibility and documentation requirements. (Homeless definition in 24 CFR 576.2) This includes a requirement that the assistance be necessary to help the program participant move as quickly as possible into permanent housing and achieve stability in housing. Note that such a household would have to be exited from the transitional housing program in HMIS and entered into the ESG program in HMIS.

## **Consultation Process**

The City and the ESG recipients continuously consult with the Continuum of Care to discuss the ESG allocation in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction; and
- Comply with eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The ESG program requires coordination among participating agencies. All ESG sub-recipients in City of Pomona are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. ESG funded agencies have easy access to membership in the Continuum of Care (COC) and are encouraged to participate in the COC. The COC has over 100 member organizations including homeless service providers, veteran service representatives, churches and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies.

The City also consulted with the Continuum of Care on the Ten Year Plan to End Homelessness to ensure the alignment of proposed ESG activities as they relate to the goals and strategies outlined in the plan. This joint effort has worked successfully in the past and the City will continue to work closely with Riverside County Department of Public Social Services (DPSS), the "umbrella" anti-poverty agency for Moreno Valley, in servicing the needs of homeless.

## **HUD ESG Link**

For complete, detailed information on authorizing laws, regulations, and Federal Register Notices for the Emergency Solutions Grants (ESG) Program, reference the link below:

<https://www.hudexchange.info/esg/esg-law-regulations-and-notice/>



## **DEFINITIONS:**

**1. Certification** means a written assertion, based on supporting evidence that must be kept available from inspection by HUD, by the Inspector General of HUD, and the public. The certification shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

**2. City** means the City of Pomona and/or its staff.

**3. Consolidated Plan** means the plan prepared in accordance with 24 CFR Part 91. An *approved consolidated* plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

**4. Grantee** means the legal entity to which HUD awards ESG grant and which is accountable for use of the funds provided. In this case, the City of Pomona is the Grantee.

**5. Sub-grantee or Sub-recipient** means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligibility activities under the grant and which is accountable to the grantee for the use of funds provided.

**6. Homeless** means an individual or family which is considered homeless as determined under Section 103, 42 USC 11302 of the McKinney Vento Act, as amended by the HEARTH Act (24 CFR 576.2) under one of the following four categories:

1) Lacks a fixed, regular and adequate nighttime residence which includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided for 90 days or less (i.e.: residing in places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings, or on the street);

2) Individuals and families who will imminently lose their primary nighttime residence (within 14 days of the date of application for homeless assistance) (i.e.: court order to vacate, lack of resources to continue staying in a hotel or motel, or no longer allowed by owner or renter of housing to stay) and no subsequent residence had been identified, and the individual or family lacks the resources or support networks needed to obtain other permanent housing.. This includes persons residing in an emergency shelter but not transitional housing;

3) Unaccompanied youth under 25 years of age and families with children and youth who are defined as homeless under the other federal statutes who do not otherwise qualify as homeless under these definitions but who:

- i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act

- of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

4) Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individuals or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary residence; has no other residence; and lacks the resources or support networks (e.g: family, friends, faith-based or other social networks) to obtain other permanent housing.

## 7. Chronically homeless means:

1. **A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:** [An individual who can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability]
  - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - ii. Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least **12 months** [one year] or on at least 4 separate occasions in the last 3 years, [where each homeless occasion was at least 15 days] **as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the**

**individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;**

2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

The final rule is at <http://www.gpo.gov/fdsys/pkg/FR-2015-12-04/pdf/2015-30473.pdf>

**8. At Risk of Homelessness** means as the term is defined by Part 24 of the Code of Federal Regulations – Emergency Solutions Grant Program (24 CFR 576.2). For the purposes of this program is defined as:

(1) An individual or family who:

- i. Has an income at 30% of median family for the area, as determined by HUD,
- ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the definition of homeless, and
- iii. Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence

Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.

**9. Continuum of Care** means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

**10. Coordinated Entry System (CES):** The Coordinated Entry System (CES) **brings together existing programs into a no-wrong-door system, connecting homeless adults to the best resources for them.** This system was developed to coordinate provider’s efforts, create a real-time list of individuals experiencing homelessness in communities, and a means to quickly and efficiently match people to available housing resources and services that best fit their needs.

**11. Crisis Housing:** emergency shelter in the coordinated homeless system.

**12. Day Shelter:** a shelter whose primary purpose is to provide temporary shelter for the homeless in general or specific subpopulations of the homeless. The day shelter does not require occupants to sign leases or occupancy agreements. The day shelter meets the emergency shelter definition and may be funded as an emergency shelter under ESG. Also, the primary purpose must be evident in the shelter's features; at a minimum, homeless people must be able to stay in the facility for as many hours as it is open.

**13. Emergency Shelter:** The term Emergency Shelter was revised by 24 CFR Part 576.2 to mean “any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG. This definition excludes transitional housing. However, projects that were funded as an emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of

whether the project meets the revised definition. The LA COC has adopted the term short-term crisis housing to refer to Emergency Shelter.

**14. The definition of a family:**

- a. Households consisting of one or more minor children (17 or under) in the legal custody of one or two adults who are living together and working cooperatively to care for the children. This includes 2-parent and 1-parent families, including those with same sex partners, families with intergenerational or extended family members, unmarried couples with children, families that contain adults who are not the biological parents of the children, and other family configurations.
- b. Households currently without minor children, in which the mother is in her last trimester of pregnancy, or mothers who have been medically diagnosed as having a “high risk” pregnancy.

**15. Homeless Management Information System (HMIS)** means the information system designated by the Continuum of Care to comply with the HUD’s data collection, management, and reporting standards and used to collect client- level data and data on the provision of housing and services to homeless individuals and families and persons at- risk of homelessness.

**16. Housing-**ESG programs offer a household the opportunity to choose its neighborhood (including the school district) as well as its type of housing (such as single family home, apartment, duplex, garden-style home unit, Mobil home, ect.) Within the city of Pomona, however, the housing selected is subject to housing quality and occupancy requirements/standards as set forth in the city’s ESG Program Guidelines.

**17. Permanent Housing:** The term ‘permanent housing’ means community-based housing without a designated length of stay, and includes both permanent supportive housing and permanent housing without supportive services.

**18. Private nonprofit organization** means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

**19. Program income** shall have the meaning provided in 24 CFR 85.25. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

**20. Program participant** means an individual or family who is assisted under ESG program.

- 21. Program year** means the consolidated program year established by the recipient under 24 CFR part 91.
- 22. Recipient** means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.
- 23. Subrecipient** means a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.
- 24. Supportive Services:** The term `supportive services' means services that address the special needs of people served by a project, including:
- a. the establishment and operation of a child care services program for families experiencing homelessness;
  - b. the provision of employment assistance, including job training;
  - c. the provision of outpatient health services;
  - d. the provision of food assistance and nutritional counseling;
  - e. the provision of case management services;
  - f. the provision of assistance in obtaining permanent housing, including housing search;
  - g. the provision of outreach services;
  - h. the provision of life skills training;
  - i. the provision of mental health services, trauma counseling, and victim services;
  - j. the provision of benefits assistance in obtaining other Federal, State, and local assistance available for residents of supportive housing (including mental health benefits, employment counseling, and medical assistance, but not including major medical equipment);
  - k. the provision of legal services for purposes including requesting reconsiderations and appeals of veterans and public benefit claim denials and resolving outstanding warrants that interfere with an individual's ability to obtain and retain housing;
  - l. the provision of— (i) transportation services that facilitate an individual's ability to obtain and maintain employment; and (ii) health care; and
  - m. Other supportive services necessary to obtain and maintain housing.
- 25. Transitional Housing:** The term `transitional housing' means housing the purpose of which is to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months or a longer period approved by HUD.
- 26. Victim service provider** means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or

stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

**27. Youth** means a person less than 25 years of age.

**28. Domestic Violence against Woman (VAWA )** The **Violence Against Women Act** of 1994 (**VAWA**) is a United States federal law (Title IV, sec. 40001-40703 of the Violent Crime Control and Law Enforcement Act, H.R. 3355)

## APPENDIX L – HOME-ARP PLAN



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



## PRESENTED TO:

U.S. Department of Housing and Urban Development (HUD)

## PREPARED BY:

City of Pomona, Neighborhood Services Department

Benita DeFrank, Director

Beverly Johnson, Housing Services Manager

As approved by City Council  
on April 18, 2022



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## INTRODUCTION

The City of Pomona's HOME-American Rescue (ARP) Allocation Plan describes how the City engaged in consultation and public participation as a part of the Plan's development. It outlines how the City will use HOME-ARP funds to address the needs of qualifying populations. Qualifying Populations" is defined as persons who are: (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.

The City will receive \$3,190,091 in HOME-ARP funding to be used in accordance with this Allocation Plan.

### ***HOME-ARP Eligible Activities:***

1. Administration and Planning Costs;
2. Development of Rental Housing (Acquisition, Rehabilitation, Construction)
3. Development of Non-Congregate Shelter (Acquisition, Rehabilitation, Construction);
4. Tenant-Based Rental Assistance (TBRA);
5. Supportive Services; and
6. Nonprofit Operating and Capacity Building Assistance

### ***The following are the major components addressed in the plan:***

- Consultation;
- Public Participation;
- Needs Assessment and Gaps Analysis;
- Identification of HOME-ARP Activities;
- HOME-ARP Production Goals;
- Preferences; and
- HOME-ARP Refinancing Guidelines

## CONSULTATION

### *Summary of Consultation Process*

The HOME-ARP Allocation Plan is a result of consultation with a wide spectrum of public and private agencies. Before developing the HOME-ARP Allocation Plan, the City conducted extensive public outreach activities beginning October 2021. The engagement efforts included virtual stakeholder focus groups, community meetings, workshops, tabling events, online social media, resident survey, agency poll, and digital information through the Neighborhood Services Department/Housing Division webpage. In addition, the City held a public hearing in order to garner input and feedback on eligible uses of HOME-ARP funds. These consultation avenues presented the attendees with background information on HOME-ARP Program, the amount of funding available and its eligible uses. Specific recommendations for projects and programs were not received through the consultation process.

### **There were no comments not accepted.**

Below is a summary of the City's Consultation Efforts including the targeted audience:

Method of Outreach	Date	Target of Outreach
"Your Voice Counts" Postcard Production	10/4 – 7 <sup>th</sup> , 2021	Residents/ Citywide
Early Bird Announcement for CDBG RFP	10/14/2021 Emailed	Currently CDBG funded agencies
Early Bird Announcement for CDBG RFP	10/14/2021 USP Mail	Agencies listed on our RFP interest list
"Your Voice Counts" Postcard Postcards Citywide Mass Mailing to 43,000 households	10/25/2021 – USPS (1st Print)	Residents
"Your Voice Counts" Postcard City's website "home page"	10/19/2021	Citywide
"Your Voice Counts" Postcards (City Hall lobby kiosk & Housing Authority counter, City Library, Code Compliance, Planning and Business License, Utilities Counters, Administration and City Clerk)	On the Floor 10/25/2021	Customers, clients, residents, stakeholders

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"Your Voice Counts" Postcard	Placing Between Week of 10/25	Customers (Starbucks Garey / Mission)
Community Needs Meetings advertised on Electronic Billboard (Mission and Garey)	10/19/2021 Mark Gluba	Citywide
Community Needs Meetings advertised on City Hall Lobby / TV Monitor	10/19/2021 Mark Gluba	Customers
Community Needs Meetings advertised on City Website (Home, News, Calendar Events, NSD page)	10/25/2021	Citywide
"Your Voice Counts" Postcard posted to City's social media outlets • Facebook • Twitter • City Website • Instagram	10/25/2021	Agencies, residents, participants
"Your Voice Counts" Postcard Newspaper AD in La Nueva VOZ (Citywide free bilingual newspaper)	October 2021 Issue	Residents
Community Life Commission (CLC) Meetings	10/26/21 @ 6:15 PM 2/22/22 @ 6:15 PM	Commissioners & Residents
Community Needs Meetings (3 Via Zoom and 1 in person)	<b>Wed, Oct 27, 2021 @ 6:30 PM</b> <b>Wed, Nov 17, 2021 @ 6:30 PM</b> <b>Wed, Dec 8, 2021 @ 6:30 PM</b> (In-Person, City Library) <b>Wed, Jan 13, 2022 @ 6:30 PM</b>	Residents and stakeholders
<b>SURVEY</b> advertised City Website • Home • Calendar • News • Announcements • Neighborhood Svcs Page • Community Services Page • Electronic Billboard • TV Monitor's in Lobby  advertised on Social Media and Newspaper • Facebook • Twitter • City Website • Instagram • La Voz News Paper	10/25/2021	Citywide/ Residents
<b>SURVEY LIVE</b> On Survey Monkey	10/26/2021	Citywide/ Residents

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Notice of Funding Availability for CDBG Request for Proposals (RFP) Public Notice advertised on <ul style="list-style-type: none"> <li>• Facebook      • Twitter</li> <li>• City Website      • Instagram</li> <li>• Daily Bulletin New Paper</li> </ul>	10/28/2021 – 01/13/2022	Citywide/ Residents
<b>Lead Tableting Events</b>  1. 10/27/21 – National Lead Prevention Week – Pomona Library @ 3pm  2. 10/30/21 – Women’s Health Fair by Assembly Member Freddie Rodrigues @Washing Park 10 AM  3. 11/6/2021 – Pomona Connect Event @ Washington Park 2pm	TBD Confirmed w/ Maria	Citywide/ Residents
Continuum of Care Coalition (agencies including service providers)	11/04/2021 @ 9AM	Stakeholders
“Your Voice Counts” Postcard Postcards Citywide Mass Mailing to 43,000 households	11/9/2021– USPS (Second Print)	Residents
Request for Proposals (RFP) Workshop	11/10/2021 @ 9:30 AM	CBO's
Presentation at Pomona’s Promise Monthly Meeting	October 14, 2021 @ 3:30 PM Contact: Christina Jimenez <a href="mailto:cjimenez@projectsister.org">cjimenez@projectsister.org</a>	Stakeholders
Request for Proposals (RFP) MAKEUP Workshop	TBD 12/14/21 @ 10:30 AM 1/06/21 @ 4:00 PM	CBO's
Community Needs SURVEY <b>Social Media Video Highlight (Facebook, Instagram)</b>	January 27, 2022	Citywide
City Council Public Hearing	5/2/2022 @ 7:00 PM 6/6/2022 @ 7:00 PM	Citywide/Residents/City Council

**Organizations Consulted, Method of Consultation & Feedback**

The following outlines specific organizations consulted, the method of consultation and feedback:

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Agency/Organization Consulted	Type of Agency/Organization	Name & Title	Method of Consultation	Feedback
Los Angeles Homeless Services Authority (LAHSA)	Provides regional planning that coordinates housing and services for homeless families and individuals in Los Angeles County	LAHSA Management Staff 2/9/2022	Webinar/ HOME-ARP: The LA CoC's Recommendations to Participating Jurisdictions	Recommendations shared at the regional level
Los Angeles Homeless Services Authority (LAHSA)	Provides regional planning that coordinates housing and services for homeless families and individuals in Los Angeles County	Pablo De Lara, Coordinator, Community Relations	Webinar/Poll	See poll results
Prototypes Women's Center	Provides behavioral, medical, mental health care, substance use disorder treatment, transitional housing and re-entry services	Rebecca Andreano	Webinar/Poll	See poll results
Tri-City Mental Health	Provides mental health services to children, youth, adults and elderly	Mary Monzon, Housing Manager	Webinar/Poll	See poll results
Hope for Home	Emergency Shelter	Julia Estrada, Program Manager	Webinar/Poll	See poll results
City of Pomona	Local Government	Donyielle Holley, Homeless Programs Supervisor	Webinar/Poll	See poll results
Tri-City Mental Health	Provides mental health services to children, youth, adults and elderly	Aziza Manuel, Homeless Services Director for East Valley Community Health Center	Webinar/Poll	See poll results
Tri-City Mental Health	Provides mental health services to children, youth, adults and elderly	Isela Moreno, Program Supervisor	Webinar/Poll	See poll results
Volunteers of America of Los Angeles	Provides emergency shelter, transitional & permanent housing, case management & support to veterans, homeless families	Mary Tawadros, Partner Relations Specialist / Volunteers of America Los Angeles (VOALA)	Webinar/Poll	See poll results
Hope for Home	Emergency Shelter	Lidia Orozco, Research Analyst	Webinar/Poll	See poll results
Hope for Home	Emergency Shelter	Freddy Martin, Program Coordinator	Webinar/Poll	See poll results

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Volunteers of America of Los Angeles	Provides emergency shelter, transitional & permanent housing, case management & support to veterans, homeless families	Amanda Romero, Senior Program Manager	Webinar/Poll	See poll results
Hope for Home	Emergency Shelter	Julia Estrada, Program Manager	Webinar/Poll	See poll results
Volunteers of America of Los Angeles	Provides emergency shelter, transitional & permanent housing, case management & support to veterans, homeless families	Reggie Clark, Program Manager	Webinar/Poll	See poll results
Inland Mediation Board	Fair Housing	Agency Representative	Webinar/Poll	See poll results
Housing Rights Center	Fair Housing	Agency Representative	Webinar/Poll	See poll results
Independent Living Skills Center in Claremont	Provides free independent life skills or services to people with disabilities and seniors	Agency Representative	Webinar/Poll	See poll results
Ability First in Claremont	Provides life skills and fun and engaging programs to children and people with disabilities	Agency Representative	Webinar/Poll	See poll results
Inland Valley Hope Partners in Pomona	Provides food, shelter and supportive services for the homeless population	Agency Representative	Webinar/Poll	See poll results
Project Sister Family Services in Pomona	Provides counseling, and crisis intervention services to victims of sexual assault and abuse	Agency Representative	Webinar/Poll	See poll results
Neighborhood Legal Services of LA in Los Angeles	Provides free legal representation, advice and education to low-income families and communities.	Agency Representative	Webinar/Poll	See poll results
Cal Poly Pomona's Veteran's Research Center	Provides personal and academic support to student veterans and their families	Agency Representative	Webinar/Poll	See poll results



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VA Loma Linda Health Care Systems / Veterans Affairs	Provides health care and counseling to meet the needs of veterans, their families and caregivers	Agency Representative	Webinar/Poll	See poll results
Pomona Housing Authority	Provides housing assistance to qualified households	George Montano, Pomona Housing Authority Manager	Webinar/Poll	See poll results

Survey comments include feedback from residents, including those persons with lived experience of homelessness and lived experience of housing instability. In addition to the survey, feedback was garnered from stakeholders through an online poll. Results were immediately shared with the group, which provided a more in-depth discussion on priorities. Stakeholders included the Pomona Continuum of Care (PCOCC), domestic violence providers, veterans' groups, the Pomona Housing Authority and other public/private organizations that address the needs of the qualifying populations, including agencies that address fair housing, civil rights, and the needs of persons with disabilities.

- A virtual stakeholder focus group held for the Hope for Home Partners took place on Thursday, February 17, 2022 at 10:00am.
- A virtual stakeholder focus group for the Pomona Continuum of Care Coalition took place Thursday, March 3, 2022 at 10:00am.

Below are poll results from stakeholder meetings. (See Appendix A for other comments)

**Poll Results**

Q1	Which of these activities are most needed to address homeless and housing insecurity? (03-03-22)		2/17/2022	TOTAL
Development of non-congregate shelter (shelter with private rooms)	1	1		2
Development of preservation of affordable rental housing	13	7		20
Rental assistance for tenants	1	1		2
Supportive services (homeless prevention, child care, job training, case management, housing counseling)	5	3		8
<b>Grand Total</b>	<b>20</b>	<b>12</b>		<b>32</b>

Q2	For DEVELOPMENT OR PRESERVATION OF AFFORDABLE RENTAL HOUSING, which item do see as most important? (03-03-22)		2/17/2022	TOTAL
Convert existing building into rental units	12	7		19
New Construction of rental units	5	3		8
Purchase and Renovate existing rental complex	3	2		5
<b>Grand Total</b>	<b>20</b>	<b>12</b>		<b>32</b>

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Q3	For RENTAL ASSISTANCE FOR TENANT, which item do you see as most important? (03-03-22)	2/17/2022	TOTAL
Combination of rent/utilities	11	7	18
Rent only	9	5	14
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q4	For SUPPORTIVE SERVICES, which item do you see as most important? (03-03-22)	2/17/2022	TOTAL
Budget/credit repair	2	1	3
Case Management	6	4	10
Homeless prevention/landlord mediation	9	5	14
Housing Search	2	1	3
Job training	1	1	2
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q5	For DEVELOPMENT OF NON-CONGREGATE SHELTER (shelter with private rooms), where do you feel shelter should be located? (03-03-22)	2/17/2022	TOTAL
Acquire existing building for use as non-congregate shelter and renovate	6	3	9
Conversion of existing shelter from congregate to non-congregate	2	1	3
Hotel/Motel rooms	6	4	10
Scattered site	6	4	10
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q6	Should other resources in the community be used to support activities listed above questions? (ex: Section 8 vouchers, CARES Act Funds, Faith-based organizations) (03-03-22)	2/17/2022	TOTAL
Yes	20	12	32
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q7	What unmet needs among people experiencing homeless or housing insecurity or those fleeing domestic violence do you see? (03-03-22)	2/17/2022	TOTAL
Inadequate services for persons with mental illness	1	1	2
Lack of housing affordable to people earning 30% or less of the area median income	12	7	19
Lack of housing affordable to people earning 50% or less of the area median income	7	4	11
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q8	Select the highest need. (03-03-22)	2/17/2022	TOTAL
Development of Affordable Rental Housing (including construction or rehab of existing units)	13	8	21
Supportive Services	3	2	5
Tenant Based Rental Assistance	4	2	6
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q9	Select the highest affordable housing activity needs in Pomona? (03-03-22)	2/17/2022	TOTAL
Assistance for landlords	1	1	2
Conversion of Hotel/Motel Rooms to Housing	2	1	3
Creating new Affordable Housing Units	6	3	9
Permanent Supportive Housing	11	7	18
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Q10	Count of 10. Which type of respondent best describes your group? (select one) (03-03-22)	2/17/2022	TOTAL
Homeless or domestic violence service provider	10	6	16
Local or state government agency	3	2	5
Organization that address the needs of persons with disabilities	4	2	6
Public housing agency	3	2	5
<b>Grand Total</b>	<b>20</b>	<b>12</b>	<b>32</b>

Based on analysis of the poll responses and other comments received during development of the HOME-ARP Allocation Plan and the City's FY 2022-23 Annual Action Plan for other entitlement funds, there is a continuous need to focus on affordable rental housing opportunities, supportive services and development of non-congregate shelter.

## **PUBLIC PARTICIPATION**

### ***Summary of Public Participation Process***

Surveys and informational postcards notifying resident of community meeting dates regarding were available in English and Spanish. Additionally, Spanish translators were present at all meetings. The following summarizes the City's efforts for Public Participation:

HOME-ARP Plan Development: Citizens, qualified populations and other public and/or private agencies were invited to provide input into the development of the Plan, including identification of priority needs and setting goals and objectives. Input was achieved through one or more of the following mechanisms: community meetings/stakeholder focus groups, community needs survey, online polls, request for funding proposals (RFPs), public comment period and public hearing process.

Public Hearings and/or Meetings: Public hearings provide a major source of citizen input on proposed programs and activities. A public hearing was held on **April 18, 2022** in order to receive input on homelessness needs. Other stakeholder meetings were held virtually.

Public Notification: To ensure that all City residents had ample opportunity to take notice of scheduled public hearings, notices were published in a local newspaper of general circulation at least ten (10) days prior to the date of public hearing per the City's Citizen Participation Plan.

Evaluation/Review and Comment: For development of the HOME-ARP Allocation Plan, citizens were given (15) days to review and comment on the Draft HOME-ARP Plan from April 1, 2022 through April 18, 2022. The City published a public notice in the local newspaper informing interested persons about the Plan review/comment period. (See Appendix A for a copy of the public notice)

Access to Information/Availability to the Public: As required by Federal regulations, the HOME-ARP Plan was made available at the following locations: Neighborhood Services Department – Housing Division- 1st Floor and the City of Pomona Website. The City has procedures in place to provide Information to those requesting communication, accessibility and/or reasonable accommodations.

***Efforts to Broaden Public Participation***

As exhibited in the consultation and public participation sections, the City conducted extensive outreach via various methods in effort to broaden public and stakeholder participation. This included a public survey distributed citywide, notification of public meetings via postcards distributed citywide, stakeholder agency meetings, agency polls on the needs of the qualified population, a public hearing and social media campaigns.

***Summary of Comments and Recommendations Received***

SEE APPENDIX A FOR A SUMMARY OF COMMENTS.

***Summary of Comments and Recommendations Not Received***

All comments were accepted. There were no comments not accepted. All comments received were considered in the development of the plan and are included in APPENDIX A.

## NEEDS ASSESSMENT AND GAP ANALYSIS

This section of the HOME-ARP Plan represents an examination of the City's Housing, Homeless and Non-Homeless Special Needs Assessment. The Assessment will provide a more detailed look at the City's homeless needs and the services and facilities to meet those needs. In determining the needs of the qualified population, several characteristics of the households are key. Those include household size and composition, income, access to affordable rental units and supportive services needed. The most current data available is from the point in time count and the housing inventory count for quantifying the individuals and families in the qualifying populations and their need for additional housing, shelter or services.

### *Size and Demographic Composition of Qualifying Populations*

All data charts listed below are based on the Los Angeles County 2020 Point in Time Homeless Count. All reported data are reflective of the County as a whole and demographic data is not broken down to the City level.

Summary of Persons in Each Household Type	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
<b>Persons in households without children</b>	5780	2338	43103	51221
<i>Persons age 18 to 24</i>	579	553	2077	3209
<i>Persons over age 24</i>	5201	1785	41026	48012
<b>Persons in households with at least one adult &amp; one child</b>	8281	1192	2943	12416
<i>Children under age 18</i>	5100	738	1584	7422
<i>Persons age 18 to 24</i>	530	110	332	972
<i>Persons over age 24</i>	2651	344	1027	4022
<b>Persons in households with only children</b>	16	9	44	69
<b>Total</b>	<b>14,077</b>	<b>3,539</b>	<b>46,090</b>	<b>63,706</b>

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Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

Demographic Summary by Race	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Black or African-America	7363	1790	19845	28998
White	5921	1461	21854	29236
Asian	153	40	975	1168
American Indian or Alaska Native	141	84	1224	1449
Native Hawaiian or other pacific islander	85	23	289	397
Multiple Races	414	141	1903	2458
<b>Total</b>	<b>14,077</b>	<b>3,539</b>	<b>46,090</b>	<b>63,706</b>

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

Demographic Summary by Ethnicity	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Hispanic/Latino	5078	1201	16726	23005
Non-Hispanic/Non-Latino	8999	2338	29364	40701
<b>Total</b>	<b>14,077</b>	<b>3,539</b>	<b>46,090</b>	<b>63,706</b>

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

City of Pomona HOME-ARP Allocation Plan  
(Amendment to FY 2021 Annual Action Plan)

Demographic Summary by Gender	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Female	7031	1306	11963	20300
Male	6952	2121	33314	42387
Transgender	79	79	684	842
Gender Non-conforming	15	33	129	177
<b>Total</b>	<b>14,077</b>	<b>3,599</b>	<b>46,090</b>	<b>63,706</b>

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

Summary of Chronically Homeless Persons in Each Household Type	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Chronically Homeless persons in households without children	1768	22	21285	23075
Chronically Homeless persons in households with at least one adult and one child	635	0	722	1407
Chronically Homeless persons in households with only children	0	0	0	0
<b>Total</b>	<b>2,403</b>	<b>22</b>	<b>22,057</b>	<b>24,482</b>

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

City of Pomona HOME-ARP Allocation Plan  
(Amendment to FY 2021 Annual Action Plan)

Summary of all Other Populations Reported	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
<b>Severely Mentally III</b>	1922	492	11711	14125
<b>Chronic Substance Abuse</b>	698	221	14284	15203
<b>Veterans</b>	263	614	2804	3681
<b>HIV/AIDS</b>	245	63	857	1165
<b>Victims of Domestic Violence</b>	644	97	3143	3884
<b>Unaccompanied Youth</b>	<b>428</b>	<b>551</b>	<b>2,119</b>	<b>3,098</b>
<i>Unaccompanied youth under 18</i>	16	9	44	69
<i>Unaccompanied youth 18-24</i>	412	542	2075	3029
<b>Parenting Youth</b>	<b>379</b>	<b>81</b>	<b>168</b>	<b>628</b>
<i>Parenting youth under 18</i>	0	0	6	6
<i>Parenting youth 18-24</i>	379	81	162	622
<i>Children of Parenting Youth</i>	538	111	298	947

Source: HUD 2020 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations (CA-600 Los Angeles City & County CoC). Data references the County level and includes City of Pomona. Demographic data down to the City of Pomona level is not available.

**Pomona Point in Time Count 2020:** According to the Los Angeles Homeless Service Authority (LAHSA), data from the 2020 City of Pomona Point in Time (PIT) Count indicated that the overall homeless population increased by 4% to 722. From 2019 to 2020, the unsheltered population count decreased by 8.3%. In comparison to the 2019 PIT results of 428, the 2020 PIT count was 402.4. The decrease has been a direct result from expansion of supportive services and opening of the local homeless services center. The unsheltered population accounts for persons residing on the street, cars, vans, RV/Campers, makeshift shelters, and tents.

From 2019 to 2020, individuals in an emergency shelter increased by 8.8% (250 to 272 individuals). Transitional housing increased by 585.7% (7 to 48 individuals). Overall, the shelter population from 2019 to 2020 increased 24.5%, demonstrating progress in overall efforts to



combat individuals residing on the street or in dwellings. In addition, the local Hope for Home Homeless Services Center offers year-round shelter beds, both emergency and transitional beds, coupled with onsite resources such as mental health services, case management, housing navigation, substance abuse resources, and much more to promote whole person care. Due to the opening of Hope for Home, the City of Pomona has seen a gradual increase in the sheltered population between 2018 and 2020.

The Los Angeles Homeless Services Authority (LAHSA) provides City data on both unsheltered and sheltered population. In addition, LAHSA does report on the type of dwelling and shelter placement. The types of dwellings include cars, vans, RVs/campers, makeshift shelters, and tents whereas shelter placements encompass emergency shelter and transitional housing. Under the homeless count, both unsheltered and sheltered data is captured, but does not report demographic data (e.g. race, gender, etc.) at the City level.

Dwelling Type	Total
Cars	45.9
Vans	44
RVs/Campers	94.1
Makeshift Shelters	6.6
Tents	16.8

*Source: Los Angeles Homeless Services Authority (LAHSA) 2020 Pomona Homeless Point in Time Count by Community/City Dashboard*

As of March 2022, there are currently 41 veterans in Pomona enrolled in the VASH Program and permanently housed (*Note: This data only reflects veterans who are housed and housing may not equate to 'permanent supportive housing.'*)

### ***Description of the unmet housing needs and service needs of qualifying populations***

The City of Pomona has taken critical steps to increase opportunities for housing, provide access to stable housing and home ownership to lower income residents, and reduce the number of people experiencing homelessness. Although there has been immense progress on implementing new programs and policies, conducting the Needs Assessment and Gap Analysis gives the City the opportunity to revisit planning efforts and determine the allocation of HOME-ARP funding based on current unmet housing needs. It is particularly imperative to examine what the unmet housing needs are during the COVID-19 pandemic to build and create new strategies that align with the current realities and resources Pomona residents are facing.

The COVID-19 pandemic illuminated preexisting housing and homelessness issues the Pomona community was facing, and only deepened the complexities of these issues. Based on the 2022 National Equity Atlas Rent Debt Dashboard, the State of California has an estimated \$3.5 billion total rent debt. The City of Pomona has assisted households with

processing emergency rental applications as all of them fell behind on rental payments and were confronting a situation where they were at-risk of falling into homelessness. With the Los Angeles County eviction moratorium in place, households were able to request assistance and remain in housing. However, if households could not secure assistance prior to the eviction moratorium's end date, many would undergo legal proceedings to move out of their housing.

Homeless Prevention Programs remain a top priority to mitigate the increase of unsheltered individuals and families and housing instability in Pomona. Long-term solutions to homelessness require preventative measures, especially as economic impacts are prevalent among low-income communities and are a direct result from the pandemic and housing policies. According to the City's *Pro Housing Pomona – Housing Element 2021-2029*, nearly two out of three households (61.9%) in Pomona are considered lower income and are not able to afford housing within the community. Current existing homeless prevention programs typically provide short-term assistance and direct services to assist individuals and families. Examples of homeless prevention includes, but not limited to:

- Rental Assistance, Emergency Housing Assistance, Security Deposits
- Utility Deposits, Utility Assistance
- Transportation Related Services
- Motel Vouchers
- Reunification Services
- Debt Resolution
- Eviction Prevention (e.g. landlord/tenant legislation, legal service and representation)
- Housing Legal Assistance

Homeless Prevention Programs have reduced the likelihood of households falling into homelessness and reducing shelter entry. Qualifying populations would include low income households residing in Pomona that meet program qualifications, which are typically based on need and vulnerabilities, housing barriers (e.g. eviction history), income qualification, and city policy priorities (e.g. residing in Pomona).

According to the City of Pomona City Council Priorities and Goals, there are two significant goals related to increasing housing opportunity and stability. These two goals are:

- Goal J: Encourage the development and maintenance of quality housing opportunities for all
- Goal K: Reduce the unsheltered population by 10% annually and take actions to mitigate the impacts of homelessness on the community

Under Goal K, the City has provided action steps that will help to reduce and mitigate homelessness. One of the actions steps is to increase resources to support unmet needs of family and youth homelessness, including homeless prevention, crisis housing, rapid

rehousing, supportive services, and case management. In addition, the construction and completion of the Hope for Home Homeless Services Center has provided the opportunity to connect individuals experiencing homelessness to housing placements through the strong collaborative model between local organizations. However, once an individual transitions out from the shelter setting or from a dwelling not meant for human habitation, it is critical to have programs with the objective to occupy housing and sustain self-sufficiency. Through homeless prevention and other housing subsidy programs, individuals also have the opportunity to remain connected to the network of providers in the case of needing further support.

Part of the collaborative model the City of Pomona follows immensely helps to successfully house individuals and families. Yet, a challenge that so many Pomona residents and organizations encounter when actively trying to prevent homelessness is navigating the rental market. The City of Pomona actively supports Pomona's low income residents, the elderly and individuals living with disabilities in privately owned rental housing units. However, there is still a need to increase access to voucher programs. According to the City's *Enhanced Strategic Plan to Prevent and Combat Homelessness* and the *Pro Housing Pomona – Housing Element 2021-2029*, residents in Pomona are rent burdened. Rent burdened is defined as spending more than 30 percent of household income towards rent. There are approximately 8,300 extremely low-income households in Pomona living in extreme poverty, which translates to household incomes earning less than 30 percent of the Median Family Income and cannot afford current rent prices. In addition, households with moderate income who typically earn too much to qualify for a housing voucher program, do not have sufficient income to access affordable housing. Therefore, unmet needs can be tackled from various approaches to provide further sources of affordable housing production and opportunity, which include:

- **Sheltered and unsheltered homeless populations** – In Pomona there are never enough shelter beds for every unsheltered person, every night. For sheltered persons, there is a severe lack of supportive transitional or permanent supportive housing to help them transition away from homelessness.
- **Currently housed and at risk of homelessness** – Increasing housing costs continue to strain households at risk of homelessness. A total lack of quality housing options is the primary issue.
- **Households requiring services or housing assistance to prevent homelessness** – Identify and act upon opportunities to expand and strengthen the Housing Authority's rental assistance programs, which includes implementing programs that address special population needs (e.g. youth) Provide access to rental assistance whether it be a voucher, subsidized rental, or affordable mortgage. Others may require short-term assistance due to an unexpected expense to get back on their feet. Access to accessible housing may be necessary to keep persons with disabilities safely housed.

- **Households at greatest risk of housing instability or in unstable housing situations.** – Overcrowded or rent overburdened households require safe, affordable housing options.
- **Affordable Housing** - Identify innovative affordable housing development approaches to address homelessness and extremely low income households develop an incentive program to promote the building of accessory dwelling units and utilize them to assist households experiencing housing displacement.

These approaches are all in alignment with the City of Pomona’s City Council Priorities and Goals – Goal J: Encourage the development and maintenance of quality housing opportunities for all.

### ***Current Resources Available to Assist Qualified Population***

Qualified persons is defined as those that are experiencing homelessness or at imminent risk of homelessness. Providing an adequate supply of decent and affordable housing for qualified populations requires supportive services, safe housing and funding from various sources. The following resources are currently available to assist qualified populations:

### **Funding Sources Currently Available**

#### ***1. Section 8 Housing Choice Voucher***

The Section 8 Housing Choice Voucher program is a Federal government program established by the 1974 Housing and Community Development Act to assist very low-income families, the elderly, and the disabled with rent subsidy payments in privately owned housing units. Section 8 program participants are able to choose any housing that meets program requirements and are not limited to units located within subsidized housing projects. Program participants contribute 30 to 40 percent of their income towards rent and utilities. The Pomona Housing Authority (PHA) administers Section 8 Housing Choice vouchers within the City. Between Fiscal Year 2018 and 2021, the City has allocated 4,102 housing vouchers to assist low-income families, persons experiencing homelessness, veterans, and disabled families in the community.

#### ***2. Grants and Programs***

The City receives a variety of financial resources dedicated to expanding economic opportunities for the Pomona community. For Fiscal Year 2021-22, the follow entitlement funds were received of which a portion was allocated to grant programs that assist the qualified population:

<b>2021-2022 ENTITLEMENT ALLOCATIONS</b>	<b>AMOUNT</b>
Community Development Block Grant (CDBG)	\$2,043,385
HOME Investment Partnership Program (HOME)	\$880,191

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Emergency Solutions Grant (ESG)	\$177,141
Emergency Solutions Grant (ESG) – Cares Act	\$6,423,756
<b>ENTITLEMENT ALLOCATIONS TOTAL</b>	<b>\$9,524,473</b>

### **Community Development Block Grants (CDBG)**

The Community Development Block Grant (CDBG) program provides annual grants on a formula basis to cities to develop viable urban communities by providing a suitable living environment and by expanding economic opportunities, including local homeless programs. Annually, CDBG funds are allocated for homeless assistance operations and program implementation.

### **HOME Investment Partnership Program (HOME)**

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80 percent of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industries and non-profit organizations. Annually, HOME funds are allocated for tenant-based rental assistance to help the homeless or those at risk of becoming homeless.

### **Emergency Solutions Grant (ESG)**

Emergency Solutions Grant (ESG) program activities place emphasis on transitioning persons experiencing homelessness from temporary unstable living situations to permanent and stable housing to assist persons with attaining and sustaining self-sufficiency. . Annually, ESG funds are allocated for emergency shelter operations, and data collection and management.

### **Supportive Services Currently Available**

The City of Pomona plans, coordinates and organizes strategies to assist the City's homeless population in collaboration with other public and private organizations. The County of Los Angeles through the Los Angeles Homeless Services Authority (LAHSA) has the primary responsibility for providing homeless services to all service planning areas (SPA) located within the county. The City of Pomona falls within SPA 3 – San Gabriel Valley and receives resources from LAHSA and SPA 3 agencies, such as the San Gabriel Valley Council of Governments (SGVCOG), to host program activities dedicated to helping unhoused persons. Through the collaborative model, the City of Pomona works in partnership with several site partner agencies to operate and administer program activities at the Hope for Home Homeless Services Center. The site partners include Volunteers of America Los Angeles (VOALA), the region's mental health provider – Tri-City Mental Health Services, East Valley Community Health Center, Prototypes, and Goodwill of Southern California. The site partners focus on providing program

participants with mental health, primary healthcare, substance abuse, case management, financial literacy, and employment supports.

Community networks are important as they guide efforts to address homelessness and housing issues to ensure progress is being made. The City of Pomona's Continuum of Care Coalition (PCOCC) is an organized coalition to deliver working group efforts to meet the specific needs of people who are experiencing homelessness within our community. The coalition invites different voices and perspectives to the table that examine homelessness and housing in all its layers and identify missing resource gaps. In addition, the PCOCC shares out local, regional, and countywide updates on homeless and housing initiatives. By determining the need through community involvement, the City can utilize the most effective and data-driven approaches to help Pomona's unhoused residents quickly gain housing stability and supportive services.

Through funding sources such as Measure H, State HEAP, Emergency Shelter Grant (ESG), Supportive Housing Program (SHP), Shelter Plus Care (S+C), the Section 8 Program and Community Development Block Grant (CDBG); emergency, transitional, and permanent forms of housing have been supported. Although not a complete solution, these programs, combined with services and other sources of funding, bring us closer to the goal of a seamless and comprehensive system of care for unhoused individuals and families in Pomona.

### ***Gaps in Current Shelter and Housing Inventory and Service Delivery System***

The City of Pomona invested in the construction and development of Hope for Home Homeless Services Center ("Hope for Home"), a year-round shelter program with the mission of reducing the unsheltered count in the community. Hope for Home carries the vision of being a one-stop centralized location where individuals experiencing homelessness can access crisis and transitional housing coupled with supportive social services that will assist each individual with their transition into permanent housing and reach self-sufficiency. Hope for Home has a network of site partners consisting of local agencies who provide supportive services to individuals residing at Hope for Home. The supportive services include primary and mental healthcare, substance abuse resources, case management, and employment services.

Hope for Home is operated by Volunteers of America Los Angeles (VOALA), who oversees the day to day activity and shelter bed utilization. Hope for Home manages a total of 205 shelter beds. Between 2019 and 2020, there was a total number of 275 unduplicated bed services along with supportive services (e.g. case management, substance abuse, mental health, etc.). The opening of the shelter has assisted with the success of moving individuals from a crisis or transitional housing and into a permanent placement. However, due to the COVID-19 pandemic, there was a severe decrease in shelter bed services. Hope for Home underwent several quarantines, which initiated a pause on services and new client intakes, as Hope for Home staff were required to issue social distancing and appropriate safety measures.

Furthermore, since the COVID-19 pandemic, site partner networks and City staff witnessed a shift in the type of shelter required for specific populations experiencing homelessness. Either because an individual was considered at high-risk of contracting COVID-19 because of an existing medical condition, or families were not eligible at some shelters, a congregate living situation such as Hope for Home, may not be ideal. A Hope for Home setting may not be a placement for specific individuals or families experiencing homelessness, or special populations, and instead these populations may require a motel voucher stay or another non-congregate temporary living arrangement.

There is currently 30 shelter beds reserved for families at a local agency – Inland Valley Hope Partners, but the increase in family homelessness is requiring that the City explore further opportunities to identify housing placements and promote affordable housing options. Additionally, the City in collaboration with the Los Angeles County Department of Children and Family Services (DCFS) under the Foster Youth Initiative (FYI) Program, identified 90 youth who are either experiencing homelessness or at-risk of homelessness in Pomona. The City of Pomona has the commitment to increasing affordable housing opportunities and a network of community partners to address youth homelessness, as this is a current gap in service. The limited housing market and shelter placements for diverse populations residing in Pomona speaks to the seriousness of the housing crisis. The City of Pomona is dedicated to closing the gaps in service in order to support the production and inventory of quality, equitable, and affordable housing across all income levels in Pomona.

Lastly, the City of Pomona works with vast community networks that each play a role in effectively resolving intersecting issues of homelessness. Although there are numerous supportive services provided not only at the shelter, but outside programs as well, the City of Pomona commits to seeking and implementing new programs that will be beneficial to reducing homelessness. For example, the City of Pomona has confronted several interactions with individuals or families experiencing homelessness who are in need of financial assistance. Due to the high need, the City of Pomona plans to implement a program called, Financial Social Work, which follows the objectives of reducing financial hardships, maximizing financial strengths, minimizing financial challenges, and decrease financial stress.

### ***Characteristics of Housing Associated with Instability and Increased Risk of Homelessness***

“Severe Housing Problems” is an official term used by the Census Bureau in its Comprehensive Housing Affordability Strategy (CHAS), which provides detailed information on housing needs by income level for different types of households in Pomona. The most recent available CHAS data for Pomona was published in August 2020 and was based on 2013-2017 ACS data. Pomona experiences the following Severe Housing Problems that are associated with housing instability and increased risk of homelessness:

- **Housing cost burdens** - State and Federal standards indicate that a household paying more than 30 percent of its income for housing is overpaying. Severe overpayment is when greater than 50 percent of total income is allocated to housing costs. Overpayment for housing can cause an imbalance on the remainder of a household’s budget. Overpayment (also referred to as cost burden) provides an indicator of the ability to sustain a household budget in consideration of other factors beyond housing costs (utilities, food, maintenance, etc.). Whenever households pay an excessive amount of their income on costs directly related to housing, it decreases the amount of income available for other needs. Twenty-one percent of renters in Pomona experience a cost burden over 30 percent.
- **Overcrowding** - Severely overcrowded households are households with greater than 1.5 persons per room. An overcrowded household may result from a number of factors, including a lack of affordable housing (which forces more than one household to live together) and/or a lack of available housing units of adequate size. Overcrowding in households can accelerate the physical deterioration of housing stock and infrastructure due to the intensive use of individual housing units resulting in excessive wear and tear, and the potential cumulative overburdening of community infrastructure and sewer, trash, and water service capacity. This burden can further be exacerbated by declining environmental and public health outcomes due to proximity of persons living together. According to the City of Pomona, 2021-2029 Housing Element Update, the City of Pomona has the greatest percentage of overcrowded units at 31.3 percent, as compared to surrounding cities and to the County of Los Angeles.

### ***Priority Needs for Qualifying Populations***

The City of Pomona intends to prioritize the

- Purchase and Rehab of Non-congregate Shelter for families and individuals experiencing homelessness
- Affordable housing options for homeless and extremely low-income households with a supportive service component



### ***Determination of Level of Need and Gaps in Shelter/Housing Inventory/Service Delivery Systems***

The gaps in Shelter, Housing Inventory and Service Delivery systems were based on the review and assessment of the following data sources:

- 1) **“A Way Home” – City of Pomona’s Homeless Strategic Plan** - created an opportunity to pivot toward a homeless crisis response system that focused on housing as a platform for service delivery. Outreach teams focused on building trusting relationship and connecting individuals experiencing homelessness with housing and services.

#### **A Way Home: Community Solutions for Pomona’s Homeless**

##### Principles

- A. Homelessness is a crisis in Pomona.
- B. Make homelessness brief and one-time.
- C. Homelessness is solvable.
- D. Addressing our Fair Share.

##### Strategies

- Reduce the Number of Pomona’s Unsheltered Homeless
  - Reduce the Negative Impacts on Community Neighborhoods and Public Spaces through the Coordination of Services
  - Have an Engaged and Informed Community Regarding Homelessness and Homeless Solutions Goal
  - Balance the Needs and Rights of Homeless Persons and the Larger Community through Updated Fair, Legal and Enforceable Policies and Ordinances
- 2) **Lived Experience Summit** – The Homeless - Lived Experience Summit hosted by the City in February 2018 served as a pivotal moment in creating programs for people experiencing homelessness in Pomona. Of the 95 people who attended the forum, 88 completed surveys highlighting priorities such as the need for affordable housing, WiFi access and expanded storage space. A focus group of participants and alumni provided their insights as part of a process evaluation the City commissioned to gauge strengths and areas of improvement.
  - 3) **Housing Element** – City has established goals, policies, and programs aimed at identifying funding opportunities and partnering with the development community to increase the amount of affordable housing built in future developments.

- 4) **Consultation** – City conducted extensive consultation prior to completing the HOME-ARP Plan, including community needs-based surveys, focus groups, and community polls.
- 5) **Other Data Systems** – Data from additional systems were used to perform needs assessments and to identify gaps in shelter, housing inventory and services delivery:
- a. Census Bureau, Comprehensive Housing Affordability Strategy (CHAS)
  - b. American Community Survey (ACS)
  - c. Homeless Management Information System (HMIS)
  - d. Housing Pro Software (Housing Choice Vouchers)

## HOME-ARP ACTIVITIES

### ***Method for Soliciting Applications for Funding and/or Selecting Developers/Service Providers/Subrecipients/contractors***

Based on the City's HOME-ARP needs assessment, it is recommended that funds be used for: 1) development of non-congregate shelter; and 2) to provide supportive services to qualified population . HOME-ARP is the perfect resource to supplement current funding used to assist qualified populations. The City plans to administer eligible activities directly, except for supportive services. No portion of the HOME-ARP Admin funds will be provided to Subrecipient agencies.

The City plans to issue a Request for Proposals (RFP) to community-based organizations to solicit Subrecipient agencies that will assist in providing supportive services to the qualified populations. In cases where acquisition, rehabilitation or development of properties are undertaken, the City will issue a Request for Bids (RFBs) to solicit qualified developers and/or contractors to assist the City in developing rental housing and/or non-congregate shelter.

HOME-ARP funds will be available for eligible activities once the HOME-ARP Allocation Plan is approved by HUD.

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

The City plans to allocate HOME-ARP funding as follows:

<b>Eligible Activity</b>	<b>Funding Amount</b>
Administration and Planning Costs	\$478,513
Development of Non-Congregate Shelter	\$2,361,578
Supportive Services	\$350,000
<b>TOTAL</b>	<b>\$3,190,091</b>

***Characteristics of Shelter/Housing Inventory/Service Delivery Systems and Rationale for Funding***

The overall lack of affordable housing inventory, as well as the limited availability of non-congregate shelter options have strained supportive services for qualified populations. The City of Pomona has been providing non-congregate shelter options through the use of hotels/motels as temporary or short-stay options. A review of this effort has continued to show great success, both in terms of service delivery, as well as to offer more independence options to qualified populations. Those benefiting from temporary shelter solutions are also provided an array of services through the City's many partnerships with private organizations.

**HOME-ARP PRODUCTION GOALS**

***Number of Affordable Rental Units to be produced for Qualifying Population***

As of November 2021, the City acquired a five-unit multi-family complex to house homeless families in crisis. The City of Pomona hopes to expand non-congregate shelter through development/rehabilitation of interim shelter for those families in crisis. It is anticipated that the HOME-ARP funding will support the creation of another 5-10 units of interim housing.

***Specific Affordable Rental Housing Production Goals and Prioritization***

There are currently no plans to construct affordable housing units. The plan is to develop non-congregate shelter through acquisition and/or rehabilitation of existing units and provide Supportive services to assist qualified populations in securing resources that lead to affordable housing.

**PREFERENCES**

The City does not intend to set preferences to any qualifying populations.

**HOME-ARP REFINANCING GUIDELINES**

The City does not intend to allow refinancing existing debt with HOME-ARP funds.

## **APPENDIX A: PUBLIC HEARING NOTICE & PUBLIC COMMENTS**





**CITY OF POMONA  
COMBINED NOTICE**

**ATTACHMENT No. 2**

**10-DAY NOTICE OF A PUBLIC HEARING & NOTICE OF 15-DAY  
COMMENT PERIOD FOR THE DRAFT HOME-ARP ALLOCATION PLAN**

**NOTICE IS HEREBY GIVEN** that the City of Pomona has prepared the Draft HOME-American Rescue Plan (HOME-ARP) Allocation Plan as required by the U.S. Department of Housing and Urban Development (HUD). Copies of the Draft Plan will be available to the public for review and comment (see below for specific dates and locations). In addition, the City of Pomona Neighborhood Services Department will hold a public hearing on the following date to receive public comments on the Draft Plan:

**DATE:** Monday, April 18, 2022  
**TIME:** 7:00 PM  
**LOCATION:** Pomona City Hall Council Chambers  
505 South Garey Avenue  
Pomona, CA 91769

On March 11, 2021, Congress approved a \$1.5 trillion American Rescue Plan. This plan contains \$5 billion for affordable rental housing and homeless assistance through HOME-ARP. Approximately \$197 million was allocated to 30 cities in Los Angeles County. These formula block grant funds provide cities with flexible funding to reach populations experiencing homelessness or those currently at risk of homelessness and address local affordable housing, non-congregate shelter, and supportive service needs within respective communities.

The City of Pomona was awarded \$3,190,091 in HOME-ARP funding. These funds are not the traditional HOME Program funds and are intended to address homelessness assistance and supportive services. The following are eligible HOME-ARP uses:

1. Development and Support of Affordable Rental Housing;
2. Tenant-Based Rental Assistance;
3. Supportive Services for Qualifying Populations; and
4. Acquisition and Development of Non-Congregate Shelter (NCS)

**REVIEW PERIOD AND LOCATION OF COPIES OF THE DRAFT HOME-ARP  
ALLOCATION PLAN**

Copy of the Draft HOME-ARP Plan will be available on the City of Pomona's website at <https://www.pomonaca.gov/government/departments/neighborhood-services/housing-services/community-development-block-grant-unit-cdbq> or at the following location for a 15-day public review and comment period:

- City of Pomona City Hall Offices, 505 South Garey Avenue, during the following hours: Monday through Thursday 7:30 AM – 6:00 PM, at the following locations:

⇒ Neighborhood Services Department, Housing Division Front  
Counter – 1<sup>st</sup> floor

Comments may be made before the public hearings, during the public hearings, within 15-days of the initial public notice, or until **April 18, 2022**. Written comments should be addressed to Beverly Johnson, Housing Services Manager, Neighborhood Services Department, Housing Division, P.O. Box 660, Pomona, CA 91769. Phone comments can be made at 909-620-2433 or 909-620-3772.

**Published this 1<sup>st</sup> day of April, 2022 in the Inland Valley Daily Bulletin**

## SURVEY COMMENTS

### HOMELESS SERVICES

- Transition from shelter to employment. Break the cycle... also, why are surrounding communities dumping the unhoused in Pomona. There needs to be a clear plan for this, when the goldline is done, we can expect to have an acute influx similar to what Azusa experienced however they had plan.
- Permanent housing
- End sanctuary city so criminals stop coming to Pomona
- Many have mental health issues due to some form of addiction.
- The homeless should have conservators to handle their funds, that way their rent is definitely paid for and their basic necessities are met
- Get them off our streets
- Partner or collaborate with nearby cities to see how they are combating these issues to see if the city of Pomona can mirror some of the same programs and/or resources. For instance, the city of Chino partners with a non-profit organization called SWAG that provides support and case management to homeless individuals.
- We need to address unhoused people squatting in vacant houses/houses for sale.
- Healthy Food in Shelter
- The homeless around my area that suffer mental health issues need different solutions. It's unsettling when someone comes screaming obscenities. There are many because we get them from the surrounding cities we call neighbors.
- There needs to be many more affordable housing projects and shelters
- Thanks
- Homeless actually like being homeless. They want to continue their drug use and bad habits and living on the streets means they don't have to answer to anyone except themselves. It's disgusting. And they want to have rights but they mess up property that isn't theirs. Property that someone went to work and bust their butts to have what they have. The city doesn't do anything about it and side with the homeless. What happened to homeowner's right to pursue happiness.
- Mental health art community programs
- We need to help those that are truly homeless, not the drug addicts that have taken over our streets.
- This city has many shelters. We keep investing in this area but fail to protect the people and businesses in the city of Pomona. It's seems like they have more rights than the people paying taxes here in the city when we shop (more than 10%). Where is that money going to?



- Please let's get homeless people off the streets my car has been broken into three times, they all have been caught and were all homeless persons
- Public restrooms and showers, like a center
- The strict regulations on helping unhoused peoples is only furthering the crisis in Pomona. Harm reduction is a better plan.
- Mental health services, behavioral services, drug and alcohol treatment
- Help not just the super poor, help the low/middle class too
- Need to do something about all the transients taking over areas where we live. Bringing drugs into communities. Can't just let them take up wherever they want. They refuse to comply with shelters, want to live the way they live causing damage to neighborhoods. Not ok at all.
- They need mental health and drug rehab. Counseling, transitional housing, Jobs
- Homeless is a problem that will never go away. It's best to set up a designated area for them that is away from the hard working people of Pomona
- Cleaning out and up areas where the homeless hang out. Parts of the city, which are some of the nicest sections are becoming a mess
- Like I said you have a lot of prostitution drug users in the homeless people in the streets of Pomona this is ridiculous the mayor and stuff gets paid to do something this town is ridiculous you guys have a source of income to be bringing in more resources
- Provide health services to the homeless
- why everyone homeless comes to Pomona
- This is also important because Pomona is the 7th largest city in LA County. We have a lot of unhoused people coming in from other areas, more affluent areas. How can we allocate a bigger budget towards this?
- Encourage Sacramento and Washington for mental health funding
- Homelessness should be considered in the context of mental health and drug addiction rehabilitation. We should encourage lifestyle changes that are a part of receiving aid. Housing first is not seeming to work.
- Criminalize behaviors that encourage homelessness: drug addiction, public defecation, camping in public spaces, etc. Addicts won't ask for help if you don't make them. Increase law enforcement.
- increase law enforcement
- Take care of POMONA's homeless people NOT the ENTIRE county's
- DON'T pour money into the homeless situation. Instead, RE-THINK the strategies that the city can use to usher the homeless into a better life. Many of the homeless will not be able to move onto a more stable life without pressure. Give them a chance to earn money by giving them manageable goals - e.g. picking up litter and paying them for each bag of trash they collect!!!!
- Mental health and drug rehab are important

- For those who are homeless, perhaps a neighborhood of tent sites could be built that provides security, restrooms, laundry, and other services a homeless person may need.
- It almost feels like nothing is being done about the homeless problem. It's getting worse.
- The unsheltered have TONS OF FUNDING. No money for the shelter resistant people. They elect to live in the street. All money going to Dept to oversee issue but no money for handling drugs, prostitution, vandalism, graffiti, etc. Enough funding for programs, keep the parks clean and restrooms clean, get rid of the vandals/criminals using our parks to have their criminal enterprise
- So many transients throughout Pomona getting sent here by nearby cities and many transients don't want help, and something needs to be done. It's not safe for children elderly, young women to walk near transients due to their aggressive, inappropriate sexual behavior.
- Strict laws on camping and open flames to prevent fires
- Reconsider different grant options to higher in house outreach teams/programs to address homelessness in Pomona. Current homelessness action plan is not efficient/cost wise for the city. Union station, LAHSA, etc. have not been efficient to the city addressing the homelessness in the community.
- Stop just shuffling them around, stealing their stuff, and then saying you are "helping" them
- While I can't see how homelessness can be prevented without changing society as a whole I do think people need help. Again, rental assistance tends to inflate prices by giving into landlords it also helps those in need.
- Interested in building an ADU to assist with affordable housing for older homeless people. Need financing assistance
- homeless areas in use need to be policed for trash mitigation and safe for residents
- Drug rehab and code enforcement
- I don't want my city to be a haven for the homeless. I want for these homeless individuals to have a conservator to handle their finances, in order to be able to find them a place to live - rather than just handing their money over to them to use on whatever they want.
- Mental health services for the less fortunate/homeless
- There should be no homeless individuals living on the streets of Pomona.
- Permanent supportive housing, hygiene centers, stop in care places, bathrooms, safe places to be, needle exchange, harm reduction, stop criminalizing homelessness, food centers.
- provide housing for youth as well as adults
- Pomona app for residents to report and identify community assistance incidents.
- let police handle the homeless
- Mental health services and rehabilitation for unhoused people

- The homeless situation is out of control. It is frightening to walk around Pomona, and almost impossible to do so without being accosted by someone.
- Coordination with surrounding cities to improve programs in this entire area.
- Some practices encourage homeless to come to our City and that is unacceptable. Homeless in the City should be identified and work done to treat their humane needs but not to overindulge them and attract more homeless to our community.
- Show kindness to the homeless, compassion from authorities on site.
- Too many homelessness is our city
- Real Mental health care for homeless, lower income people and serious drug rehabilitation instead of auto incarceration. What are the roots of these issues needs to be looked into. Follow up and monitoring for mental illness and drug rehabilitation persons
- Removal or Reduction of homeless persons on the on and off ramps, in and around neighborhoods and camping in riverbed areas
- I don't know what the answer is, but we already have a homeless shelter which is probably a magnet for more homeless people to come to Pomona. When that is full to excess have to go. Let La Verne, Claremont and etc. do their share to help with the problem. Pomona should not be a dumping ground for the homeless.
- Panhandling and loitering enforcement needed in public and shopping center areas. The constant harassments drive residents to shop in neighboring cities, such as Chino Hills and Diamond Bar.
- Transients and their issues need to be addressed/ including accountability
- Community clinics
- Find jobs, or help clean up the city with pay
- Open sources of job training, to provide assistance to unemployed people, people at risk, etc. Open permanent help centers for food products, with strict adherence to people in need.
- We all have the right to have a home or a place where we can shelter from the cold or the heat and we all want to get ahead and we all want to have the same opportunities to get ahead but we need to be given the opportunity to achieve it without being judged for our mistakes that we continue to have in the past we all have the right to another opportunity we are all human beings and no one is perfect Thank you, I hope you take it into account. Thanks
- Services for people with drug use problems

## **STAKEHOLDER OUTREACH MEETINGS**

### **Pomona Promise Via (Zoom)**

October 14, 2021

3:30pm-5pm

Number of Attendees= 23

**Q:** How often is the community survey updated?

**A:** The survey is updated annually however the categories do not change because they coincide with the eligible activities.

**Q:** A resident inquired about providing services to a resident that has issues with running water in their house.

**A:** Beverly gave them her contact information.

**Q:** The resident had a question regarding project based housing her question was per HUD housing is there a lifespan where eventually the building have to be returned after for example 30 years?

**A:** A voucher is reissued once it expires. Contact info for Bev was provided.

**Q:** Someone inquired about the housing center off mission, is it at full capacity?

**A:** The current capacity at the moment is 200 individuals however due to Covid the number has been reduced. Contact information for Danielle Holley was provided.

### **Community Life Commission (CLC) Via (Zoom)**

October 26, 2021

6:15pm- 7:15

Number of Attendees=26

**Comissioner Houston:** She is part of a neighborhood Watch and she will be picking up paper surveys

**Comissioner Mundy:** Is that funding strictly available to the blue shading on the map

**A:** Funding must meet the eligible beneficiaries, Per HUD Low income threshold is 0-80% AMI, The blue shaded areas are defined as 51% or more low-mod income persons in the area.

**Commissioner Ellis- Royston:** Statutory spending cap and eligible activities

**A:** Statutory caps are standard however, every year the eligible activities may change from year to year. must apply for funding.

**Commissioner Manzanares:** had a question regarding council process for allocating

funds.

**A:** With a combination of stakeholder meetings CLC meeting and other meetings comments and the results of the tally survey we provide all this information to the council members and the mayor and eligible activities and the CBO that applied to make their recommendations

**Q:** for the funding recommendation is there a formula that is used?

**A:** the formula is based on the number the percentage of low mod people in their district the mayors portion is citywide so his formula is different for the allocation of funding.

**Commissioner Canales:** How do the families find out about the services?

**A:** there is an extensive outreach process.

**Commissioner Mundy:** it was suggested that in the contract the agencies community-based organizations that apply should have a social media plan.

**Commissioner Ellis-Royston:** agrees with Commissioner Canales and Commissioner Mundy that more outreach should be done by CBO to spread awareness to residents regarding funding received.

### **Community Needs Meeting Via (Zoom)**

October 27, 2021

6:30pm-7:30pm

Number of Attendees= 12

**Gary, Neighborhood Watch:** in order to be considered for you did not go through the criteria to meet for the funding?

**A:** community-based organizations that are looking to receive funding submit a proposal and in order to receive funding, there is a mandatory workshop that must be attended. During the workshop we go over the proposal that was sent out and we provide technical assistance with regard to use.

**Q:** For the entire block of Chester Place between white and Park, we need streetlights. I've submitted an application to the city and it went through there I believe the engineering department through Public Works and for funding for city street lights for the street on my block as we have no lights whatsoever and I was told that we would pretty much just be in line amongst other individuals application if I understand you correctly so that's a different process

**A:** yes, you contact the public works department. They receive funding for Alley Improvements.

### **Continuum of Care (COC) Via (GoToMeeting)**

November 4, 2021

9:00am-10:00am

Number of Attendees=23

**Q:** Can I please get the paper surveys?

**A:** Yes, we can mail them out or drop off

During the meeting, Two (2) agencies requested surveys be dropped off at their sites.  
House of Ruth and Hope for Home

### **Community Needs Meeting Via (Zoom)**

November 17, 2021

6:30pm-7:30pm

Number of Attendees=5

No comments or questions

### **Community Needs Meeting (In Person)**

December 8, 2021

6:30pm-7:30pm

Number of Attendees= 0

No comments, no attendees

### **Community Needs Meeting Via (Zoom)**

January 13, 2022

6:30pm-7:30pm

Number of Attendees= 9

No comments for this meeting.

### **Community Life Commission (CLC) Via (Zoom)**

February 22, 2022

6:15-8:15

Number of Attendees= 13

**Commissioner Manzanares: Q:** How do folks hear about this plan?

**A:** Early bird notification

Agencies added throughout the year

Community meetings

Notify commission to spread the word

Virtual stakeholder meetings

Social media  
Survey  
Press releases  
Public notices

**Chair Jimenez Q:** Is this before taxes?

**A:** Yes

**Commissioner Houston Q:** Homeowners receive grant money, are they taxed on money?

**A:** No tax implications

**Commissioner Manzanares Q:** How does the city find the families?

**A:** Tabling events, flyers, Pomona connect events is one way that information is provided

**Q:** Are undocumented individuals eligible?

**A:** No, undocumented applicants are not eligible to apply

**Commissioner Mundy Q:** Three (3) methods of funding were described. One being grant money. Is there anyone tracking that source of funding?

**A:** Yes.

**Chair Jimenez Q:** Are applications on line?

**A:** Yes, but potential applicants should call first to make sure they are eligible before they go through filling out the housing department

## **APPENDIX B: HOME-ARP CERTIFICATIONS & SF 424 FORM**





### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

04/06/2022

**4. Applicant Identifier:**

CA62850

**5a. Federal Entity Identifier:**

M-21-MP-06-0528

**5b. Federal Award Identifier:**

M-21-MP-06-0528

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

CITY OF POMONA

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

95-6000764

**\* c. UEI:**

074127481000

**d. Address:**

\* Street1: 505 South Garey Avenue

Street2:

\* City: Pomona

County/Parish:

\* State: CA: California

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 91766

**e. Organizational Unit:**

**Department Name:**

Neighborhood Services

**Division Name:**

Housing Services

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

Prefix: Ms.

\* First Name: Beverly

Middle Name:

\* Last Name: Johnson

Suffix:

Title: Housing Services Manager

Organizational Affiliation:

\* Telephone Number: (909) 620-2433

Fax Number: (909) 620-4567

\* Email: beverly\_johnson@ci.pomona.ca.us



## Application for Federal Assistance SF-424

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

C: City or Township Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

### CFDA Title:

HOME Investment Partnership Program (HOME)

### \* 12. Funding Opportunity Number:

### \* Title:

### 13. Competition Identification Number:

### Title:

HOME administration, HOME-ARP Rental Housing, Tenant-Based Rental Assistance, Supportive Services and Acquisition and Development of Non-Congregate Shelter programs

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

HOME administration, HOME-ARP Rental Housing, Tenant-Based Rental Assistance, Supportive Services and Acquisition and Development of Non-Congregate Shelter programs

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

38th

\* b. Program/Project

38th

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

07/01/2021

\* b. End Date:

06/30/2022

**18. Estimated Funding (\$):**

\* a. Federal

3,190,091.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

3,190,091.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

James

Middle Name:

\* Last Name:

Makshanoff

Suffix:

\* Title:

City Manager

\* Telephone Number:

(909) 620-2314

Fax Number:

\* Email: james\_makshanoff@ci.pomona.ca.us

\* Signature of Authorized Representative:

\* Date Signed:

04/19/2022



## ASSURANCES - CONSTRUCTION PROGRAMS

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

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

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

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

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





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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  <div style="text-align: center;">JAMES MAKSHANOFF</div>	TITLE  <div style="text-align: center;">CITY MANAGER</div>
APPLICANT ORGANIZATION  <div style="text-align: center;">CITY OF POMONA</div>	DATE SUBMITTED  <div style="text-align: center;">04/19/2022</div>



**HOME INVESTMENT PARTNERSHIP PROGRAM /  
AMERICAN RESCUE PLAN (HOME-ARP)**

**ASSURANCES - NONSTRUCTION PROGRAMS**

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  <div style="text-align: center;">JAMES MAKSHANOFF</div>	TITLE <div style="text-align: center;">CITY MANAGER</div>
APPLICANT ORGANIZATION  <div style="text-align: center;">CITY OF POMONA</div>	DATE SUBMITTED  <div style="text-align: center;">04/19/2022</div>



## HOME-ARP CERTIFICATIONS

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

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

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

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

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





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

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

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

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Signature of Authorized Official

James Mashanoff

City Manager

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Title

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April 19, 2022

Date





## City of Pomona

2023-2028 Consolidated Plan and 2023-2024 Annual Action Plan  
Improving the quality of life for our diverse community