

Written materials relating to an item on this agenda that are distributed to the legislative bodies within 72 hours before the item is to be considered at its regularly scheduled meeting will be made available for public inspection at the City Clerk's Office, 300 West Third Street 4th Floor during customary business hours. Agenda reports are also on the City of Oxnard web site at www.oxnard.org.



AGENDA
OXNARD CITY COUNCIL
COMMUNITY SERVICES, PUBLIC SAFETY,
HOUSING & DEVELOPMENT COMMITTEE
Council Chambers, 305 West Third Street
February 14, 2023
Regular Meeting - 6:45 to 8:15 PM

Zoom details to call-in for public comment during a meeting:

- 1. Dial Phone Number: (888) 475-4499**
- 2. Enter Meeting ID: 893 1924 1747**
- 3. Passcode: 994221**

If you wish to speak during public comments or a particular item on the agenda, please sign-on by following the zoom call-in steps listed above. Once the presiding officer calls for public speakers, press *9 to raise your hand to inform the City Clerk you would like to speak during the public speaking section for that particular item on the agenda, while in the zoom waiting room. Press *6 when asked to unmute. Listen to the instructions provided virtually on the phone while on hold in the zoom waiting room. Please note that there is a slight time delay when viewing the meeting via television.

IN ACCORDANCE WITH ASSEMBLY BILL 361 AND IN RESPONSE TO THE DECLARED STATE AND LOCAL EMERGENCIES DUE TO THE NOVEL CORONAVIRUS, THE LEGISLATIVE BODY WILL MEET IN-PERSON AND REMOTELY. TO PARTICIPATE REMOTELY VISIT WWW.OXNARD.ORG.

To find out how you may provide public comment, please refer to the instructions below or at www.https://www.oxnard.org/city-meetings/.

The public may view the meeting from home on Spectrum channel 10, Frontier channel 35, or YouTube at Youtube.com/oxnardnews. Video recordings of the meeting are typically available online following the meeting at the City's website at www.oxnard.org/city-meetings.

*Please see the link for the Measure M pre-recorded presentation video for each item listed on this agenda.

YOU MAY PARTICIPATE IN THE MEETING IN THE FOLLOWING WAYS:

- 1. ATTEND THE MEETING AT THE LOCATION LISTED ABOVE:** Submit a speaker card to the City Clerk.
- 2. EMAIL COMMENTS OR SIGN UP TO SPEAK REMOTELY BEFORE THE MEETING**
 - a. Submit a request to speak remotely by no later than 3 p.m. on the day of the meeting by using the form available at www.oxnard.org/citymeetings.
 - b. Submit an email to cityclerk@oxnard.org no later than 3 p.m. on the day of the meeting (indicate the agenda item number in the subject line). All email correspondence will be forwarded to the legislative body prior to the start of the meeting and made part of the legislative record.
 - c. Contact the City Clerk's Office at (805) 385-7803 to submit your request.

In compliance with the Americans with Disabilities Act, if you require special assistance to participate in a meeting, please contact the City Clerk's Office at 385-7803. Notice at least 72 hours prior to the meeting will enable the City to reasonably arrange for your accessibility to the meeting.

Agenda Item Time Estimates include: (Minutes for Presentation + Council Discussion + Public Comment)

3. PROVIDING PUBLIC COMMENTS REMOTELY DURING THE MEETING

- a. To provide public comment during the meeting dial (888) 475-4499 and enter the Meeting ID and Passcode listed above as the Zoom details for this meeting. When the presiding officer announces the particular item on the agenda you want to speak on, **press *9 to raise your hand** while in the zoom waiting room. Once called on, **press *6 to unmute** your phone.
- b. Public comments on agenda items will be taken following the announcement of the item. After the item is announced, members of the public may register or otherwise be recognized for the purpose of providing public comment.

Please review the Zoom instructions on the registration page to help ensure there are no technical difficulties during your comments and help you understand public comment procedures using Zoom. Detailed participation instructions can be found at www.oxnard.org/city-meetings.

In the event of a disruption which prevents a legislative body of the City of Oxnard from broadcasting a meeting using a call-in option or internet-based service option, or in the event of a disruption within the City's control which prevents members of the public from offering public comment using the call-in option or internet-based service option, the legislative body shall take no further action on items appearing on a meeting agenda until public access to the meeting via the call-in option or internet-based service option is restored. However, if any of the broadcast options are disrupted, but any of the other broadcast options is still available to the public, the legislative body may take further action on items appearing on a meeting agenda without waiting for the disrupted broadcast option(s) to be restored.

* The City has filed pre-election and post-election lawsuits regarding the validity of Measure M.

A. ROLL CALL, POSTING OF AGENDA, FLAG SALUTE

B. PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA

A person may address the legislative body only on matters not appearing on the agenda and within the subject matter jurisdiction of the legislative body. Speaker requests shall be submitted as set forth on the first page of this agenda. Speakers are limited to three minutes. After 30 minutes, if all speakers have not had the opportunity to speak, the remaining speakers will be given an opportunity to speak prior to adjournment of the meeting. The legislative body cannot enter into a detailed discussion or take action on any items presented during public comments at this time. Such items may only be referred to the City Manager/Executive Director/Secretary for administrative action or scheduled on a subsequent agenda for discussion. Persons wishing to speak on public hearing items should do so at the time of the hearing.

C. CONSENT AGENDA

1. City Clerk Department

SUBJECT: Approval of Minutes.

RECOMMENDATION: That the Community Services, Public Safety, Housing & Development Committee approve the minutes of the January 24, 2023 regular meeting as presented.

Contact: Rose Chaparro, (805) 385-7805

D. REPORTS

1. Police Department

SUBJECT: Agreement for Police School Resource Officer Services. (10 minutes)

RECOMMENDATION: That the Community Services, Public Safety, Housing, and Development Committee recommend the City Council approve and authorize a cost-sharing agreement between the City of Oxnard (City), and the Oxnard School District (OSD or District), from July 1, 2023, to June 30, 2026, for Police School Resource Officer (SRO) Services.

Please click the following link to view the required Measure M pre-recorded presentation video:

<https://youtu.be/tkFuFncllQ>

Contact: Jason Benites, (805) 385-7624

2. Housing Department

SUBJECT: 5-Year Public Housing Agency(PHA) Plan, Annual Agency Plan and Capital Fund Program Five-Year Action Plan for Low Rent Public Housing. (10 minutes)

RECOMMENDATION: That the Community Services, Public Safety, Housing & Economic Development Committee recommend that the Board of Commissioners:

1. Hold a public hearing to receive comments concerning the fourth year of the 5-Year PHA Plan, the 2023 Capital Fund Budget, and the Capital Fund Five-Year Action Plan; and
2. Adopt a resolution:
 - a. Approving the 2023 Annual Agency Plan, 5-Year PHA Plan for the Housing Authority;
 - b. Authorizing and directing the Chairman to execute the Department of Housing and Urban Development Public Housing Agency Certification Compliance Form certifying the Housing Authority's compliance with HUD's policies and procedures;
 - c. Authorizing the Housing Director to execute and submit all reports, documents and all other certifications required to comply with policies and procedures of the Department of Housing and Urban Development regarding the Annual Agency Plan and the 5-Year PHA Plan;
 - d. Approving the 2023 Capital Fund Budget and Capital Fund Five-Year Action Plan; and
 - e. Authorizing the Housing Director to accept and expend the funds as indicated in the 2023 Capital Fund Budget and Capital Fund Five-Year Action Plan.

Please click the following link to view the required Measure M pre-recorded presentation video: https://youtu.be/FFFdo_neWuA

Contact: Emilio Ramirez, (805) 385-8094

3. Housing Department

SUBJECT: Fiscal year 2023-24 Annual Action Plan public hearing to receive public comments relating to unmet needs of low- and moderate-income persons residing in the City of Oxnard. (30 minutes)

RECOMMENDATION: That the Community Services, Public Safety, Housing & Development Committee conduct a public hearing to receive public comments related to the unmet needs of low- and moderate-income persons residing in the City of Oxnard, for affordable housing, community and economic development, public services and homelessness for the preparation of the Fiscal Year 2023-24 Annual Action Plan.

Please click the following link to view the required Measure M pre-recorded presentation video: <https://youtu.be/cvU9NIRYot8>

Contact: Emilio Ramirez, (805) 385-8094

E. ITEMS FOR FUTURE AGENDAS

F. ADJOURNMENT



**COMMUNITY SERVICES, PUBLIC SAFETY, HOUSING &
DEVELOPMENT COMMITTEE AGENDA REPORT**

**CONSENT AGENDA
AGENDA ITEM NO. C.1**

DATE: February 14, 2023

TO: Community Services, Public Safety, Housing & Development Committee

FROM: Rose Chaparro, City Clerk, (805) 385-7805, rose.chaparro@oxnard.org

SUBJECT: Approval of Minutes.

RECOMMENDATION

That the Community Services, Public Safety, Housing & Development Committee approve the minutes of the January 24, 2023 regular meeting as presented.

BACKGROUND

Approval of Minutes.

STRATEGIC PRIORITIES

This agenda item is a routine operational item.

FINANCIAL IMPACT

There is no financial impact.

Prepared by: Rose Chaparro, City Clerk

ATTACHMENTS

1. MINUTES 01 24 2023 Community Services, Public Safety, Housing & Development

MINUTES
OXNARD CITY COUNCIL
COMMUNITY SERVICES, PUBLIC SAFETY,
HOUSING & DEVELOPMENT COMMITTEE
Regular Meeting
January 24, 2023

A. ROLL CALL, POSTING OF AGENDA, FLAG SALUTE

At 6:45 p.m., Chair Bryan A. MacDonald called to order the regular meeting of the Oxnard City Council Community Services, Public Safety, Housing & Development Committee in the City Hall Council Chambers at 305 W. Third Street, Oxnard, California. The City Clerk called the roll and announced the posting of the agenda. Chair Bryan A. MacDonald, Member John C. Zaragoza, and member Oscar Madrigal were present in person.

Staff members Alexander Nguyen, City Manager; Ashley Golden, Assistant City Manager; Shiri Klima, Deputy City Manager; Ken Rozell, Chief Assistant City Attorney; Jason Benites, Police Chief; Denise Shadinger, Assistant Chief of Police; Michael Wolfe, Public Works Director; Steve Howlett, Assistant Public Works Director; Brian Yanez, Assistant Public Works Director; Helen Miller, Chief Information Officer; Jeff Pengilley, P.E., CDD Assistant Director & Building Official; Kathleen Mallory, Planning & Sustainability Manager; Emilio Ramirez, Housing Director; Kumar Neppalli, Transportation Services Manager; Kevin Thompson, Parks Manager; Philip Schwieder, Streets Division Manager; Eric L. Storrie, CPRP, Special Districts Manager; Dee Lai, Assistant City Clerk; and Rose Chaparro, City Clerk were present in person.

Alexander Hamilton, Fire Chief participated via videoconference.

B. PUBLIC COMMENTS ON ITEMS NOT ON THE AGENDA (None received.)

C. CONSENT AGENDA

1. City Clerk Department

SUBJECT: Approval of Minutes.

RECOMMENDATION: That the Community Services, Public Safety, Housing & Development Committee approve the minutes of the January 10, 2023 regular meeting as presented.

It was moved by Member Zaragoza, seconded by Member Madrigal, to approve the Information/Consent item as presented. VOTE: MacDonald, Madrigal, and Zaragoza voted in favor; the motion carried 3-0.

D. REPORTS

1. Information Technology Department

SUBJECT: Oxnard 311 - Performance Update Report.

RECOMMENDATION: That the Community Services, Public Safety, Housing and Development Committee receive a 311 constituent relationship management performance update for the period of performance year six (May 1, 2021 through April 30, 2022) and the first half of performance year seven (May 1, 2022 through October 31, 2022), and recommend that the City Council receive the same update.

Helen Miller, Chief Information Officer presented and introduced Helen Johnson, Interim IT GIS Manager. They answered the Committee's questions. There were no public comments. Discussion ensued among the Committee and staff. The report was received and filed, no formal action was required.

2. Community Development Department

SUBJECT: Consideration to Increase the Number of Commercial Cannabis Cultivators and Allow an Expansion in the Location Where Commercial Cannabis Cultivators are Permitted.

RECOMMENDATION: That the Community Services, Public Safety, Housing & Development Committee recommend that the City Council increase the number of commercial cannabis cultivators permitted to operate in the City from two to five; and, with the exception of the Rose Santa Clara Corridor Specific Plan area, allow these uses to be sited in the same location where the City has allowed commercial cannabis manufacturing, distribution, and testing.

(This item is not considered a project under the California Environmental Quality Act.)

Kathleen Mallory, Planning & Sustainability Manager presented and introduced Matthew Simpkins, Management Analyst. They answered the Committee's questions. There were no public comments. Discussion ensued among the Committee and staff.

It was moved by Chair MacDonald, seconded by Member Madrigal, to approve the recommended action as presented. VOTE: MacDonald, Madrigal, and Zaragoza voted in favor; the motion carried 3-0.

3. Housing Department

SUBJECT: Plaza Vista Apartments Drain Line and Electrical Panel Project.

RECOMMENDATION: That the Community Services, Public Safety, Housing & Development Committee recommend that the Board of Commissioners of the Housing Authority of the City of Oxnard approve and authorize execution of the following firm-fixed price contracts:

1. Agreement number A-8512 in the amount of \$267,472.92 with Oscalibur Plumbing,

Inc. to replace the plumbing drain line at the Plaza Vista public housing site using funds appropriated from the 2019 Capital Fund grant; and

2. Agreement number A-8510 in the amount of \$341,857.79 to replace the main electrical panels at the Plaza Vista public housing site using funds appropriated from the 2019 Capital Fund grant.

Emilio Ramirez, Housing Director answered the Committee's questions. There were no public comments. Discussion ensued among the Committee and staff.

It was moved by Member Madrigal, seconded by Chair MacDonald, to approve the recommended action as presented. VOTE: MacDonald, Madrigal, and Zaragoza voted in favor; the motion carried 3-0.

E. ITEMS FOR FUTURE AGENDAS (No requests were made.)

F. ADJOURNMENT

There being no further business on the agenda, and without objection, Chair Bryan A. MacDonald adjourned the meeting at 7:08 p.m.

ROSE CHAPARRO
City Clerk

BRYAN A. MACDONALD
Chair



COMMUNITY SERVICES, PUBLIC SAFETY, HOUSING & DEVELOPMENT COMMITTEE AGENDA REPORT

REPORTS AGENDA ITEM NO. D.1

DATE: February 14, 2023

TO: Community Services, Public Safety, Housing & Development Committee

FROM: Jason Benites, Police Chief, (805) 385-7624, jason.benites@oxnardpd.org

SUBJECT: Agreement for Police School Resource Officer Services. (10 minutes)

RECOMMENDATION

That the Community Services, Public Safety, Housing, and Development Committee recommend the City Council approve and authorize a cost-sharing agreement between the City of Oxnard (City), and the Oxnard School District (OSD or District), from July 1, 2023, to June 30, 2026, for Police School Resource Officer (SRO) Services.

Please click the following link to view the required Measure M pre-recorded presentation video:

<https://youtu.be/tkFuFncfllQ>

BACKGROUND

The agreement sets forth guidelines between the OSD and the Oxnard Police Department to ensure an understanding of the goals of the SRO program and the District's commitment to reimburse the police department for a portion of the personnel costs associated with the program.

The District agrees to reimburse the Oxnard Police Department for the combined equivalent of 75% of personnel costs for two (2) SROs, including agreeing to fully reimburse the City for costs associated with staffing special school events.

School Resource Officer Program Overview

The SROs will serve the District with twenty-one (21) schools and approximately 15,000 students.

SROs assist school administrators in helping maintain a safe campus environment that is conducive to learning. SROs provide a visible presence to deter disturbances and identify trespassers on campuses. School officials rely on the training, knowledge, and experience of SROs to handle dangerous situations involving fights, weapons, and the identification of dangerous drugs. SROs also provide a service to the surrounding community by addressing concerns, such as loitering, speeding, and other traffic issues.

SROs are assigned to the District for three (3) years and their appointment follows the school's calendar year. The SROs handle police service calls in and around the school campuses, which provides relief to the department's patrol division. SROs handle a variety of issues, typically including assaults, drugs, alcohol, weapon violations, threats, bullying, child abuse, child custody, court orders, truancy, traffic issues, gangs, mental health issues, runaways, and conflict among parents. SROs are responsible for investigating violations of criminal law. When it is both necessary and appropriate, SROs enforce these laws by citing or arresting

offenders, but favor prevention and intervention strategies, viewing enforcement as a last resort. SROs frequently engage in counseling sessions, meetings, and presentations that have meaningful impacts on students and parents.

The Agreement for Police School Resource Officer Services and Cost Sharing

The agreement involves the reimbursement to the City for the services of two police officers that provide enhanced police services to the OSD. In general, the City is reimbursed for 75% of personnel costs related to the two SROs. The District's cost-sharing amount for one fiscal year is \$235,851 (75% of the cost of the two officers).

The City shall submit to the District an invoice in the amount of \$235,851 no less than 30 days prior to the end of each fiscal year for the 3-year term.

STRATEGIC PRIORITIES

This agenda item supports Public Safety strategy. The purpose of the Public Safety strategy is to restore and modernize the delivery of public safety services to provide for the safety of our neighborhoods and health of our community.

FINANCIAL IMPACT

The SRO program costs and revenue generated through the 75% reimbursement from OSD will be included in the proposed General Fund budget of each fiscal year (FY2023-24, FY2024-25 & FY2025-26).

Prepared by: Luis McArthur, Police Commander

ATTACHMENTS

1. SRO Agreement with OSD FY 2023-2026
2. PowerPoint on SROs and OSD Partnership.2

Agreement No.

AGREEMENT FOR POLICE SCHOOL RESOURCE OFFICER SERVICES AND COST SHARING

THIS AGREEMENT FOR POLICE SCHOOL RESOURCE OFFICER SERVICES (“**Agreement**”) by and between the City of Oxnard, a municipal corporation (“**City**”) and the Oxnard School District (“**OSD**” or “**District**”) is made and entered into as of July 1, 2022. City and District are sometimes individually referred to as “**Party**” and collectively as “**Parties**.”

WHEREAS, the purpose of this Agreement is to maintain the School Resource Officer (SRO) program and to set forth guidelines to ensure that law enforcement, school officials, and the communities they serve have a shared understanding of the goals of the SRO program and that SROs receive the necessary support and training to ensure a safe school environment while respecting the rights of students and improving the overall school climate;

WHEREAS, the parties agree that an effective SRO program sets forth: the role of the SRO within the context of the educational mission of the school; distinctions between disciplinary misconduct to be handled by school officials, and criminal offenses to be handled by law enforcement; respect for the rights of students; transparency and accountability; and minimum SRO training requirements;

WHEREAS, this Agreement focuses on the role of the SROs as it relates to students and faculty; it does not govern how SROs will conduct operations when dealing with adult non-school district employees in and around a school facility;

WHEREAS, the parties intend to work together to share costs and ensure the continuity of the School Resource Officer program on OSD school campuses.

City and District hereby agree as follows:

1. Scope of Services. The Oxnard Police Department (“**OPD**”) shall provide the services of one officer and one corporal to be assigned as School Resource Officers (“**SROs**”) to OSD elementary and intermediate school campuses. The SROs will work with OSD district staff as well as staff at individual elementary and intermediate schools to determine schedules and specific services at each school site. This will allow the activities and support provided by the SROs to be tailored to the specific needs of each school, and it will also provide for flexibility of the SROs’ law enforcement responsibilities and involvement with intracurricular and extracurricular activities.
2. Method of Performing Services. Subject to the terms and conditions of this Agreement, OPD personnel may determine the method, details, and means of performing the Services described herein as well as the duration of the Services. OPD shall perform services consistent with the SRO guidelines detailed in **Exhibit A** attached hereto and incorporated by this reference in full herein.

3. Cost Sharing; Reimbursement, Method of Payment. City and District agree that District shall be obligated to fund Seventy-Five percent (75%) of the cost to operate and administer the SRO program for FY 2023-2024, FY 2024-2025 and FY 2025-2026 and that City shall be obligated to fund the balance. City shall submit to District an invoice in the amount of Two Hundred Thirty-Five Thousand Eight Hundred and Fifty-One Dollars (\$235,851) (total cost for one officer and one corporal) no less than thirty (30) days prior to the end of each fiscal year: June 30, 2024 for FY 2023-2024, June 30, 2025 for FY 2024-2025 and June 30, 2026 for FY 2025-2026.

City shall send invoices to: Valerie Mitchell, Interim Assistant Superintendent, Oxnard School District 1051 South A Street, Oxnard, CA, 93030. District shall, within thirty (30) days of receiving such invoice, review the invoice and pay all charges.

4. Nonexclusive Services. This Agreement shall not be interpreted to prevent or preclude OPD personnel from rendering any services to any other person or entity as City in its sole discretion shall determine. City agrees that performing such services will not materially interfere with services to be performed under this Agreement.
5. Reporting Requirements for District/School Staff of Suspected Child Abuse Committed by a District/School Employee. Reports of suspected child abuse which would include any sexual misconduct by any District/School employee shall be reported immediately, or as soon as practicably possible, to the designated SRO. In the event that the SRO is not available, the on duty Oxnard Police Department Watch Commander is to be contacted. The police personnel receiving the report from the school district employee will make notification directly to the Family Protection Unit (FPU) Sergeant. This verbal notification to the SRO does not preclude the District/School from preparing and sending a fax or electronically transmitted written follow-up report within 36 hours of receiving the information concerning the incident (Form SS 8572 Suspected Child Abuse) or any other mandatory reporting requirements.
6. Term. The term of this Agreement shall be from July 1, 2023 to June 30, 2026, unless earlier terminated as provided herein. This Agreement may be renewed for up to two (2) additional annual terms through mutually agreed upon contract amendments.
7. Termination. Either Party may, by written notice to the other, terminate the whole or any part of this Agreement at any time and without cause by giving written notice to the other Party of such termination, and specifying the effective date thereof, at least thirty (30) business days before the effective date of such termination. Upon termination of this Agreement, City shall be compensated for those Services that City has provided to District up to the effective date of termination.
8. Force Majeure. City and District agree that neither City nor District shall be responsible for delays or failures in performance resulting from acts beyond the control of either Party. Such acts shall include, but not be limited to acts of God, strikes, lockouts, riots, acts of war, epidemics, governmental regulations imposed after this Agreement was executed, fire,

communication line failures, earthquakes, or other disasters.

9. Mutual Indemnification. Each Party shall defend, hold harmless, and indemnify the other Party and its officers, directors, employees, agents and representatives against any and all loss, liability, damage, or expense, including any direct, indirect or consequential loss, liability, damage, or cost of defense (including attorneys' fees) for injury or death to persons, including employees of either Party, and damage to property, including property of either Party, arising out of or in connection with the indemnifying Party's performance of this Agreement or failure to comply with any of its obligations contained in this Agreement. However, neither Party shall be indemnified hereunder for any loss, liability, damage, or expense resulting from its sole negligence or willful misconduct.
10. Delivery of Notices. All notices permitted or required under this Agreement shall be given to the respective Parties at the following addresses, or at such other address as the respective Parties may provide in writing for this purpose:

City:

Oxnard Police Department
251 South "C" Street
Oxnard, California 93030
Attention: Jason Benites, Assistant Chief of Police

District:

Oxnard School District
1051 South A Street
Oxnard, CA, 93030
Attention: Valerie Mitchell, Interim Assistant Superintendent

Such notice shall be deemed made when personally delivered or when mailed, forty-eight (48) hours after deposit in the U.S. Mail, first class postage prepaid and addressed to the Party at its applicable address. Actual notice shall be deemed adequate notice on the date actual notice occurred, regardless of the method of service.

11. Governing Law. This Agreement shall be governed by the laws of the State of California without regard to the conflicts of laws principles. This Agreement shall be deemed to have been made in the County of Ventura, regardless of the order of signatures of the Parties affixed hereto. Any litigation or other legal proceedings which arise under or in connection with this Agreement shall be conducted in a federal or state court located within or for the County of Ventura, California. The Parties consent to the personal jurisdiction and venue of a federal or state court located within or for the County of Ventura, California and hereby waive any defenses or objections thereto including defenses based on the doctrine of forum non conveniens.
12. Successors and Assigns. This Agreement shall be binding on the successors and assigns of the Parties.
13. Construction; References; Captions. Since the Parties or their agents have participated fully in the preparation of this Agreement, the language of this Agreement shall be

construed simply, according to its fair meaning, and not strictly for or against any Party. Any term referencing time, days or period of performance shall be deemed calendar days and not work days unless otherwise specified. All references to City include all officials, officers, employees, personnel, agents, volunteers, contractors and subcontractors of City, except as otherwise specified in this Agreement. All references to District include all officials, officers, employees, personnel, agents, volunteers, contractors and subcontractors of District, unless otherwise specified in this Agreement. The captions of the various paragraphs and sections are for convenience and ease of reference only, and do not define, limit, augment, or describe the scope, content, or intent of this Agreement.

14. Assignment. The Parties may not assign, hypothecate or transfer, either directly or by operation of law, this Agreement or any interest herein without the prior written consent of the other Party.
15. Amendment; Modification. No supplement, modification or amendment of this Agreement shall be binding unless executed in writing and signed by both Parties.
16. Waiver. No waiver of any default shall constitute a waiver of any other default or breach, whether of the same or other covenant or condition. No waiver, benefit, privilege, or service voluntarily given or performed by a Party shall give the other Party any contractual rights by custom, estoppel or otherwise.
17. No Third Party Beneficiaries. This Agreement and the performance of the obligations hereunder are for the sole and exclusive benefit of City and District. No person or entity who or which is not a signatory to this Agreement shall be deemed to be benefited or intended to be benefited by any provision hereof, and no such person or entity shall acquire any rights or causes of action against either City or District hereunder as a result of the Parties performance or nonperformance of their respective obligations under this Agreement.
18. Invalidity; Severability. If any portion of this Agreement is declared invalid, illegal, or otherwise unenforceable by a court of competent jurisdiction, the remaining provisions shall continue in full force and effect.
19. Cooperation; Further Acts. The Parties shall fully cooperate with one another, and shall take any additional acts or sign any additional documents as may be necessary, appropriate or convenient to attain the purposes of this Agreement.
20. Authority to Enter Agreement. Each Party warrants that the individuals who have signed this Agreement have the legal power, right, and authority to make this Agreement and bind each respective Party.
21. Counterparts. This Agreement may be signed in counterparts, each of which shall constitute an original.

22. Entire Agreement. This Agreement contains the entire Agreement of the Parties with respect to the subject matter hereof, and supersedes all prior negotiations, understandings or agreements.

CITY OF OXNARD

OXNARD SCHOOL DISTRICT

Alexander Nguyen, City Manager

Dr. Karling Aguilera-Fort, Superintendent

APPROVED AS TO FORM

Stephen M. Fischer, City Attorney

APPROVED AS TO CONTENT

Jason Benites, Police Chief

EXHIBIT “A”

SRO Guidelines

ROLE OF THE SRO IN THE CONTEXT OF THE EDUCATIONAL MISSION OF THE SCHOOL DISTRICT TO ALIGN SUPPORTS AND SERVICES FOR STUDENTS, FAMILIES AND STAFF.

1. The mission of the SRO program is to assist the school in maintaining a safe environment and to develop a positive relationship between students and law enforcement.
2. School administrators shall be informed as to whether an SRO will be deployed to the school and shall participate in periodic performance reviews of the SRO.
3. The SRO shall meet with school administrators, teachers, parents, and student representatives at least annually and as needed to discuss issues of school safety.
4. The SRO shall be integrated into the school community through participation in faculty and student meetings and assemblies as appropriate.
5. The SRO shall maintain weekly activity reports and submit these reports to his or her direct supervisor.
6. The SRO will participate as a member of the OSD Interdisciplinary Wellness Team.

DISTINGUISHING DISCIPLINARY MISCONDUCT TO BE HANDLED BY SCHOOL OFFICIALS FROM CRIMINAL OFFENSES TO BE HANDLED BY LAW ENFORCEMENT

1. SROs are responsible for criminal public order offenses; they are not responsible for school discipline issues.
2. Absent a real and immediate threat, as determined by the SRO, to a student, teacher, or public safety and, unless there is sufficient evidence and circumstances that warrant police action or intervention, SROs should not get involved in school discipline issues. These should generally be handled by school officials rather than through formal law enforcement intervention (e.g., issuance of criminal citation, referral to a probation officer, or actual arrest.)

RESPECT FOR THE RIGHTS OF STUDENTS

1. Absent a real and immediate threat to a student, teacher, or public safety, an SRO may conduct or participate in a search of a student’s person, possessions, or locker only where there is reasonable suspicion to believe that the search will turn up evidence that the child has committed or is committing a criminal offense.
 - a. The SRO shall inform school administrators prior to conducting reasonable suspicion searches.
 - b. The SRO shall not ask school officials to search a student’s person, possessions, or locker in an effort to circumvent these protections.
 - c. All searches at a minimum will be documented by a field interview report (FIR) that details the circumstances of the search.
2. When a school official conducts a search of a student’s person, possessions, or locker, the school official may ask an SRO to be present or to participate in such a search only when

there is reasonable suspicion to believe that the search will turn up evidence that the student has violated or is violating the law and the search is justified in scope given such suspicion.

3. Absent a real and immediate threat to a student, teacher, or public safety, a school official shall attempt to minimize requests to have an SRO present or participate in the questioning of a student that involves non-criminal matters.
4. When an SRO interviews a student for a criminal matter, reasonable attempts should be made by a school official and/or an SRO to inform the student's parents of the circumstances which led to that interview when it is practical to do so and when it would not unreasonably interfere with such investigation.

SRO TRAINING REQUIREMENTS

1. Every SRO shall attend a 40-hour Peace Officers Standards and Training (POST) approved Basic School Resource Officer course within their first year of service. Additionally, an effort will be made to complete 10 hours of annual in-service training on topics such as:
 - a. Child and adolescent development and psychology;
 - b. Positive behavioral interventions and supports (PBIS), conflict resolution, peer mediation, or other restorative justice techniques;
 - c. Children with disabilities or other special needs; and
 - d. Cultural competency.

PROMOTING NON-PUNITIVE APPROACHES TO STUDENT BEHAVIOR

1. The SRO shall be familiar with and trained in programs adopting non-punitive approaches to discipline available in the school district. If a school has implemented a specific program designed to improve overall school climate or respond to student behaviors in specific ways, the SROs should participate in trainings associated with that program. Examples of such programs include but are not limited to Lesson One, Wellness Collaborative, and Olweus Bullying Program initiated at certain schools within some school districts.

TECHNOLOGY SERVICES AND SUPPORT

1. In order for the Oxnard PD's SROs to serve the students of the OSD, all SROs will be given a user-specific login and access to the OSD network to:
 - a. Login
 - b. Run productivity software, including Microsoft Office
 - c. Print to District/School printers
 - d. Access the Internet thru the District's Internet Filter
 - e. Access WebMail from a third party provider
 - f. Access Internet Filter override
2. SROs will not be provided:
 - a. Access to install programs to workstations or servers
 - b. Access to District email accounts or the District's email address book
 - c. Access to the District's Student Information System
 - d. Access to other District files

AGREEMENT FOR POLICE SCHOOL RESOURCE OFFICER SERVICES

FY 2023-2026

Commander Luis McArthur

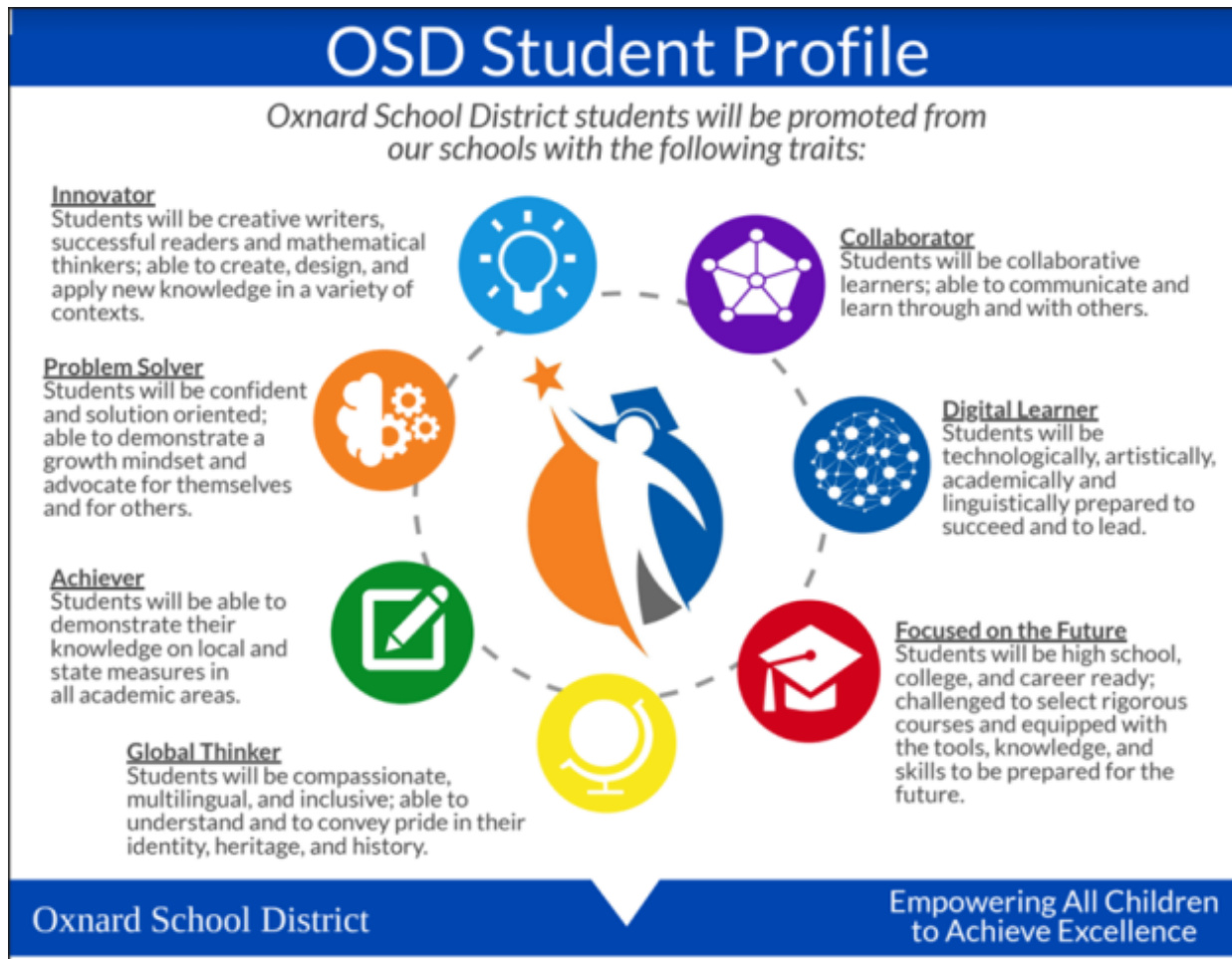
Recommendation:

That the Community Services, Public Safety, Housing, and Development Committee recommend the City Council approve and authorize a cost-sharing agreement between the City of Oxnard and the Oxnard School District from July 1, 2023, to June 30, 2026, for Police School Resource Officer (SRO) Services.

The agreement involves the reimbursement to the City for the services of two police officers that provide enhanced police services to the OSD. In general, the City is reimbursed for 75% of personnel costs related to the two SROs. The District's cost-sharing amount for one fiscal year is \$235,851 (75% of the cost of the two officers).

School Resource Officers (SROs) are Oxnard Police Officers dedicated to building community, providing support, and building positive relationships with OSD schools, students and families.

Officers go through specific training prior to becoming SROs

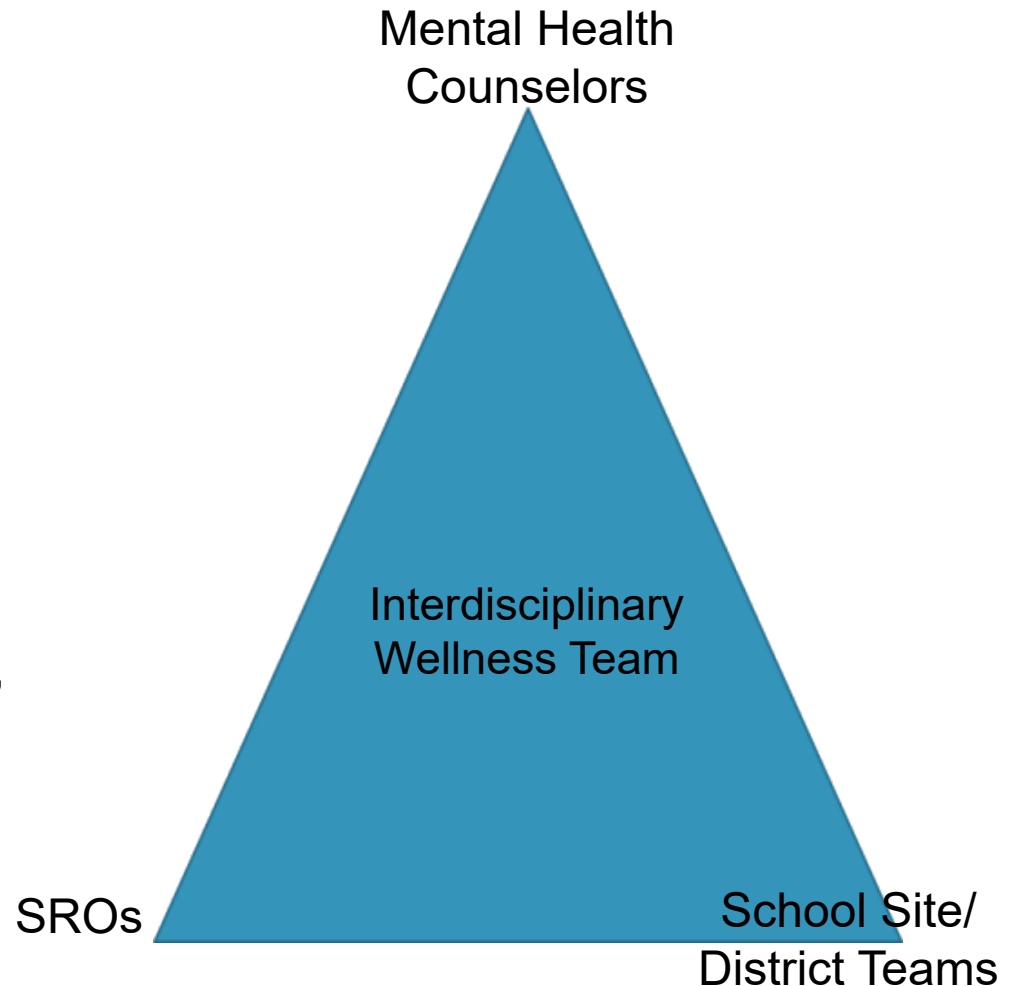


SROs will work to build a collaborative partnership that is positive for the students and supports their achievement of the traits in the OSD student profile.

On a daily basis SROs:

- Ensure that all students, staff, and campuses are safe
- Serve as a liaison between schools and the police department
- Work with students on making positive choices that will help deter them from joining gangs and/or having problems with drugs and/or alcohol
- The presence of SROs on and around the campuses promotes positive relationships with students and builds trust with OPD. Links to the surrounding school community can help in keeping OSD campuses safe.

- SROs will be part of a district wellness team with the focus on identifying and supporting students who have significant social-emotional and/or behavior needs. The team will work with school and district teams in a coordinated effort to provide support to students, families, and staff.
- Through this team, campus visits, and getting to know the students, SROs can help identify needs of students and work with sites on proactive strategies to prevent significant behavior issues.



- The mission of the SRO program is to assist the school in maintaining a safe environment and to develop a positive relationship between students and law enforcement.
- The SRO shall be integrated into the school community through participation in faculty and student meetings and assemblies as appropriate.
- The SRO will participate as a member of the OSD Interdisciplinary Wellness Team.
- SROs and OPD can also provide training to students, staff and families on drugs and other issues.

- Respect for the rights of students
- Building positive relationships with students
- Preventative instead of reactive

Distinguishing Disciplinary Misconduct to be Handled by School Officials From Criminal Offenses to be Handled by Law Enforcement

SROs are responsible for criminal public order offenses; they are not responsible for school discipline issues.

Absent a real and immediate threat, as determined by the SRO, to a student, teacher, or public safety and, unless there is sufficient evidence and circumstances that warrant police action or intervention, SROs should not get involved in school discipline issues.

These should generally be handled by school officials rather than through formal law enforcement intervention (e.g., issuance of criminal citation, referral to a probation officer, or actual arrest.)

Absent a real and immediate threat to a student, teacher, or public safety, an SRO may conduct or participate in a search of a student's person, possessions, or locker **only** where there is reasonable suspicion to believe that the search will turn up evidence that the child has committed or is committing a criminal offense.

- The SRO shall inform school administrators prior to conducting reasonable suspicion searches.
- The SRO shall not ask school officials to search a student's person, possessions, or locker in an effort to circumvent these protections.
- All searches at a minimum will be documented by a field interview report (FIR) that details the circumstances of the search.



QUESTIONS



COMMUNITY SERVICES, PUBLIC SAFETY, HOUSING & DEVELOPMENT COMMITTEE AGENDA REPORT

REPORTS AGENDA ITEM NO. D.2

DATE: February 14, 2023

TO: Community Services, Public Safety, Housing & Development Committee

FROM: Emilio Ramirez, Housing Director, (805) 385-8094, emilio.ramirez@oxnard.org

SUBJECT: 5-Year Public Housing Agency(PHA) Plan, Annual Agency Plan and Capital Fund Program Five-Year Action Plan for Low Rent Public Housing. (10 minutes)

RECOMMENDATION

That the Community Services, Public Safety, Housing & Economic Development Committee recommend that the Board of Commissioners:

1. Hold a public hearing to receive comments concerning the fourth year of the 5-Year PHA Plan, the 2023 Capital Fund Budget, and the Capital Fund Five-Year Action Plan; and
2. Adopt a resolution:
 - a. Approving the 2023 Annual Agency Plan, 5-Year PHA Plan for the Housing Authority;
 - b. Authorizing and directing the Chairman to execute the Department of Housing and Urban Development Public Housing Agency Certification Compliance Form certifying the Housing Authority's compliance with HUD's policies and procedures;
 - c. Authorizing the Housing Director to execute and submit all reports, documents and all other certifications required to comply with policies and procedures of the Department of Housing and Urban Development regarding the Annual Agency Plan and the 5-Year PHA Plan;
 - d. Approving the 2023 Capital Fund Budget and Capital Fund Five-Year Action Plan; and
 - e. Authorizing the Housing Director to accept and expend the funds as indicated in the 2023 Capital Fund Budget and Capital Fund Five-Year Action Plan.

Please click the following link to view the required Measure M pre-recorded presentation video: https://youtu.be/FFFdo_neWuA

BACKGROUND

The Quality Housing and Work Responsibility Act of 1998 (the Act) requires Oxnard Housing Authority to submit a 5-Year PHA Plan and an Annual Agency Plan. The purpose of the 5-Year PHA Plan and Annual Agency Plan, along with the program policies for the Public Housing Program (Admissions and Continued Occupancy Policy) and the Housing Choice Voucher Program (Administrative Plan), is to provide a framework for local accountability, along with an easily-identifiable source document where public housing residents,

housing voucher participants, and members of the public may locate basic information regarding a housing authority's policies, rules and regulations and services provided by the agency.

The 5-Year PHA Plan covers fiscal years 2020-2025 and the Annual Agency Plan covers fiscal year 2023. Updates must be submitted to the Department of Housing and Urban Development at least seventy-five days prior to the beginning of each fiscal year, and must include certifications that each Plan is consistent with the City of Oxnard's Consolidated Plan and in accordance with Housing and Urban Development requirements.

DISCUSSION

The 5-Year PHA Plan and Annual Agency Plan identify the Oxnard Housing Authority's goals and objectives that will enable Oxnard to serve the needs of low-income, very low-income, and extremely low-income families. The current 5-year PHA Plan was adopted in fiscal year 2020. Revisions, new activities, progress towards goals and objectives, and updates are outlined in the Annual PHA Plan (Attachment 1). The proposed revisions include a significant amendment to the Housing Choice Voucher Administrative plan and undertaking new activities related to conversion of public housing to project-based rental assistance or project-based vouchers and applying for new project-based voucher allocations. These activities were provided for in the 5-Year PHA Plan.

Adoption of a limited homeless preference to the Housing Choice Voucher Administrative Plan

The Department of Housing and Urban Development's regulations (24 CFR 982.207) permit PHAs to establish local preferences based on local housing needs and priorities. The addition of a homeless preference was discussed with the Resident Advisory Board (RAB) in 2021 and contemplated in the 2022 Annual Plan. Since then, Staff has again discussed this preference with the RAB and presented the concept to Council Committee and the full Council in 2022. The proposed change will allow for applicants who meet the definition of "homeless" to be eligible for the homeless preference. The revision to the Housing Choice Voucher Administrative Plan will be as follows:

Homeless Limited Preference (1 point)

Applicants and families who meet the definition of "homeless" will be eligible for the homeless preference. A certification of homelessness completed by a homeless services provider is required. The OHA limits the number of families that qualify for the homeless preference to fifteen (15) families annually. Once the OHA is serving fifteen (15) families in a given year, and one family leaves the program, the next family on the waitlist who meets the preference criteria will be served.

Undertaking of new activities related to conversion and project-based vouchers

In June 2020, the Oxnard Housing Authority (OHA) launched a yearlong effort "Rethink and Renew" to identify opportunities to streamline operations, improve customer service, modernize public housing units, expand programs, and close budget deficits. As part of the effort, the Department of Housing and Urban Development (HUD) provided technical assistance and assigned CVR Associates, Inc. (CVR) to conduct a thorough assessment and develop a repositioning plan to transition the OHA's public housing portfolio to a Section 8 project-based subsidy. CVR is a national, full-service management-consulting firm that provides services to public and private entities in the affordable housing industry. The term "repositioning" refers to the removal of a property from the Public Housing subsidy platform either through Rental Assistance Demonstration Program, Section 18 Demolition/Disposition, Streamlined Voluntary Conversion or the Section 32 Homeownership Program and replacing it with Section 8 assistance. Moving towards a Section 8 project-based subsidy provides a more stable stream of subsidy, is more conducive to raising debt and equity, and allows OHA to leverage funding for rehabilitation of its units. This strategy does not reduce the number of units in the inventory but rather ensures its long-term preservation by changing the funding source. In October 2021, CVR issued a formal report to the staff with a suggested implementation and phasing strategy for implementing

repositioning strategies over a five-year period (see Attachment 2). In fiscal year 2022, the OHA focused on training, capacity building, procedural development, and workflow process modifications to increase management efficiencies, effectiveness, and overall program compliance. This step is necessary to prepare for the implementation of any repositioning strategies.

For the 2023 Annual PHA plan, the OHA will begin the process of moving the repositioning activities forward. This will include procuring the appropriate firms and consultants for the completion of a physical needs assessment for each individual property, a financial analysis on the impact on both the development proformas and annual operating budget for each strategy option, environmental reviews, and development of a multiphase asset repositioning plan. The OHA has begun discussions with public housing residents regarding preliminary repositioning plans and will continue to engage all stakeholders to ensure concerns and requirements are addressed. Any conversion strategy adopted will require the OHA to submit an application for HUD approval.

In addition to activities related to the public housing program, the OHA will undertake efforts to identify and apply for new voucher allocations for project-based voucher activities. The project-based voucher is subsidized housing assistance that is tied to a specific unit. The target population will be determined by HUD's notice of funding availability and interest from affordable housing developers. The goal is to increase the number of affordable housing units available to low-income families.

Capital Fund Budget and Capital Fund Program 5-Year Action Plan

Besides any proposed revisions and new activities, the last component of the Annual Agency Plan and the 5-Year PHA Plan has to do with the adoption of an annual Capital Fund budget as well as a Capital Fund Program 5-Year Action Plan. The primary purpose of the Capital Fund Program is to preserve and maintain the integrity of the Oxnard Housing Authority's public housing stock and to fund necessary improvements. For the coming fiscal year, the Oxnard Housing Authority is presenting a budget of \$1,538,180 for the Capital Fund Program activities. The final capital fund amount that the OHA will be awarded is yet to be determined as it is based on congressional appropriation. An estimated \$441,180 of the budget is allocated towards debt repayment (principal and interest payment for 2004 capital fund revenue bond) and \$357,000 towards administrative expenses. The remaining \$740,000 is being used towards capital improvements, specifically, the American with Disabilities Act 504-conversion project and improvements necessary in preparation for real estate assessment center (REAC) inspections. The 504-conversion project refers to a multi-phase conversion project that will bring the Oxnard Housing Authority into compliance with the American with Disabilities Act. These regulations establish a minimum number of dwelling units that must be accessible for individuals with disabilities. As a result of the demolition of units in the 31-1 (Colonia Village), the Oxnard Housing Authority is deficient in 24 accessible units. The units have been selected from each project site based on ease of conversion, availability of space and cost effectiveness. In fiscal year 2023, the conversion of the units within the Althea Court and Fashion Park Place projects will take place. Besides the 504-conversion project, the OHA will be inspecting all public units and making any necessary improvements to ensure they meet REAC requirements. REAC inspections are completed by HUD every 1 to 3 years to ensure public housing and multifamily housing properties meet federal inspection standards. The proposed annual Capital Fund Program (CFP) budget and CFP Five-Year Action plan are set forth in Attachments 3 and 4.

5-Year PHA Plan, Annual Agency Plan and Capital Fund Program Process

A copy of the proposed Annual Agency Plan, the 2023 CFP Budget, and CFP Five-Year Action Plan is posted on Oxnard Housing Authority's website, at all Oxnard Housing Authority's site offices and the City Clerk's Office. The opportunity for suggestions or recommendations from the public was made available for public comment on December 1, 2022 for forty-five days (closed January 14, 2023).

The Oxnard Housing Authority conducted a public meeting on December 1, 2022 and January 26, 2023 and staff presented to the Resident Advisory Board (RAB) at those meetings and responded to inquiries from

Resident Advisory Board members and others. The RAB consists of Tenant Commissioners, public housing residents, and housing choice voucher program participants. The RAB provides comments, suggestions, and feedback to the OHA. The following verbal questions were received during the meetings (summarized):

Comment: Is the homeless preference for the same program that has been in existence for many years?

Response: The preference is related to the same program. There has been a homeless set aside program in place for the past 7 years. The existing program allows for 15 vouchers to be designated for homeless individuals and families per year. Due to the way the program was set up, there is no mechanism in place that allows staff to identify eligible applicants in an efficient manner. Additionally, it is not possible to open the waitlist specifically for this program once the existing waitlist has been exhausted and there are vouchers remaining. By adopting a preference, there will be a mechanism to identify eligible applicants and the OHA will be able to open the waitlist for this preference, if needed. This preference was proposed to the RAB in 2021 and temporarily adopted, in accordance with the waivers published by the Department of Housing and Urban Development under Notice PIH 2021-14 (HA), as a response to the COVID pandemic. The temporary waivers have expired; therefore, the OHA is proposing to formally adopt the preference to the Housing Choice Voucher Program Administrative Plan.

Comment: Can the capital fund be used to paint the interior of all public housing units?

Response: A portion of the Fiscal Year 2023's Capital Fund Budget is going towards repairs and improvements needed in preparation for inspections that the Department of Housing and Urban Development is conducting. If a unit requires painting due to normal wear and tear, it will be completed. In addition, public housing residents need to report their requests for their individual units by placing a work order. The unit will be assessed to determine corrective action.

STRATEGIC PRIORITIES

This agenda item supports the Quality of Life strategy. The purpose of the Quality of Life strategy is to restore and increase quality services and programs that enrich Oxnard's diverse community, promotes safe neighborhoods, encourages community engagement, and supports our residents in their efforts to improve their quality of life.

FINANCIAL IMPACT

This item has no impact on any City fund. The approval of the recommended action will enable the Oxnard Housing Authority to obtain various Housing and Urban Development funds, including approximately \$1,538,180 under the Capital Fund. Adoption of the 5-Year PHA Plan and the Annual Agency Plan is required for the Oxnard Housing Authority to receive the funds set forth in the Capital Fund Program Budget and Capital Fund Program Five-Year Action Plan.

Prepared by: Emilio Ramirez, Housing Director

ATTACHMENTS

1. Annual PHA Plan for 2023
2. CVR Associates, Inc. Report
3. CFP Budget 2023
4. CFP Five Year Action Plan
5. Resolution
6. PowerPoint Presentation

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																														
A.1	PHA Name: <u>Oxnard Housing Authority</u> PHA Code: <u>CA 031</u> PHA Type: ☒ High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>520</u> Number of Housing Choice Vouchers (HCVs) <u>1,904</u> Total Combined <u>2,424</u> PHA Plan Submission Type: ☒ Annual Submission ☐ Revised Annual Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. A copy of the PHA plan is located on the Oxnard Housing Authority's website: https://www.oxnard.org/city-department/housing/agency-plan-reports/ ☐ PHA Consortium: (Check box if submitting a Joint PHA Plan and complete table below) <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) in the Consortia</th> <th rowspan="2">Program(s) not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>N/A</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:						N/A											
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Lead PHA:																															
N/A																															

B.	Plan Elements
B.1	Revision of Existing PHA Plan Elements. (a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission? Y N ☐ ☒ Statement of Housing Needs and Strategy for Addressing Housing Needs. ☐ ☒ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. ☐ ☒ Financial Resources. ☐ ☒ Rent Determination. ☐ ☒ Homeownership Programs. ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☐ ☒ Substantial Deviation. ☒ ☐ Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each element below: Administrative Plan significant amendment: Adopting a homeless limited preference. Applicants and families who meet the definition of “homeless” will be eligible for the homeless preference. A certification of homelessness completed by a homeless services provider is required. The PHA limits the number of families that qualify for the homeless preference to fifteen (15) families annually. Once the PHA is serving (15) families under the preference in a given year, and one family leaves the program, the next family on the waitlist who meets the preference criteria will be served. (c) The PHA must submit its Deconcentration Policy for Field Office Review. The PHA’s deconcentration policies are listed on Chapter 4-Applications, waiting list and tenant selection of the Admissions and Continued Occupancy Policy and the Housing Choice Voucher Administrative Plan which are available online: https://www.oxnard.org/city-department/housing/section-8/admin-plan/ https://www.oxnard.org/city-department/housing/public-housing/acop/
B.2	New Activities. (a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year? Y N ☐ ☒ Hope VI or Choice Neighborhoods. ☐ ☒ Mixed Finance Modernization or Development. ☐ ☒ Demolition and/or Disposition. ☐ ☒ Conversion of Public Housing to Tenant Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☒ ☐ Project Based Vouchers. ☐ ☒ Units with Approved Vacancies for Modernization. ☐ ☒ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan. The PHA plans on taking the preliminary steps to begin repositioning activities. This will include procuring the appropriate firms and consultants for the completion of a physical needs assessment for each individual property, a financial analysis on the impact on both the development pro formas and annual operating budget for each strategy option, environmental reviews, and development of a multiphase asset repositioning plan. The PHA has almost reached the 20% program cap for conversion of tenant-based vouchers to project-based vouchers. The goal is to pursue funding opportunities that are for project-based voucher allocations that can be excluded from the program cap.

B.3	Progress Report. Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan. SEE ATTACHMENT B.3 Progress Report
B.4.	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. See Capital Fund 5 Year Action Plan in EPIC approved by HUD June 7, 2022.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☒ (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N ☒ ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. SEE ATTACHMENT C.1(b) RAB Comments
C.2	Certification by State or Local Officials. Form HUD-50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form 50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

	(a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements.				
D.	Affirmatively Furthering Fair Housing (AFFH).				
D.1	Affirmatively Furthering Fair Housing. Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item. <table border="1" data-bbox="180 993 1446 1444"> <tr> <td data-bbox="180 993 1446 1035"> Fair Housing Goal: </td> </tr> <tr> <td data-bbox="180 1035 1446 1444"> <u>Describe fair housing strategies and actions to achieve the goal</u> N/A – PHA has not received request to submit an AFH at this time. The Oxnard Housing Authority will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. </td> </tr> </table> <table border="1" data-bbox="180 1470 1446 1881"> <tr> <td data-bbox="180 1470 1446 1512"> Fair Housing Goal: </td> </tr> <tr> <td data-bbox="180 1512 1446 1881"> <u>Describe fair housing strategies and actions to achieve the goal</u> </td> </tr> </table>	Fair Housing Goal:	<u>Describe fair housing strategies and actions to achieve the goal</u> N/A – PHA has not received request to submit an AFH at this time. The Oxnard Housing Authority will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015.	Fair Housing Goal:	<u>Describe fair housing strategies and actions to achieve the goal</u>
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Fair Housing Goal:					
<u>Describe fair housing strategies and actions to achieve the goal</u>					

	Fair Housing Goal: <u><i>Describe fair housing strategies and actions to achieve the goal</i></u>
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Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

- A.1** Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. ([24 CFR §903.23\(4\)\(e\)](#))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. ([24 CFR §943.128\(a\)](#))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. ([24 CFR §903.7\(a\)\(2\)\(i\)](#)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. ([24 CFR §903.7\(a\)\(2\)\(ii\)](#))

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions.** Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. [24 CFR §903.7\(b\)](#) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. [24 CFR §903.7\(b\)](#) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. ([24 CFR §903.7\(b\)](#)) Describe the unit assignment policies for public housing. [24 CFR §903.7\(b\)](#)

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. ([24 CFR §903.7\(c\)](#))

☐ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

☐ **Homeownership Programs.** A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b)).

☐ **Safety and Crime Prevention (VAWA).** A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **HOPE VI.** **1)** A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

☐ **Mixed Finance Modernization or Development.** **1)** A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☐ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and **(2)** A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

☐ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

☐ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☐ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

Attachment B.3

Progress Report: PHA Goals and Objectives for 5-Year Plan Fiscal Years 2020-2025

HUD Strategic Goal #1: Advance Economic Opportunity

PHA Goal One: Expand the supply of assisted housing.

Objective: Apply for additional tenant based, project based, and special purpose vouchers

Progress: The Oxnard Housing Authority's (OHA) Veterans Affairs Supportive Housing (VASH) voucher allocation has increased by 25 additional vouchers for a total of 77. The OHA was awarded 40 Mainstream Vouchers and 46 Emergency Housing Vouchers. An additional allocation of 14 Housing Choice Vouchers were also awarded. An interest letter was submitted to HUD expressing interest in the Stability Voucher Program and plan on applying for vouchers, if approved.

Objective: Development of additional rental housing

Progress: Las Cortes, Inc. a non-profit corporation was established with the purpose of creating affordable housing. To date, phase I and phase II of the Las Cortes project have been completed which involved the demolition and replacement of 260 public housing units. Currently, phase III of the project is in the planning phase which will result in additional rental housing units. The OHA is working in partnership with several developers constructing or rehabilitating affordable projects, to project base vouchers. This action will increase the number of low-income families who receive subsidized housing assistance but are successful in locating a unit.

Objective: Decrease Public Housing Vacancy Rate

Progress: Public Housing vacancy rate was sustained. The units designated for conversion to comply with the Department of Housing and Urban Development's ADA-Section 504 regulation, were not factored. The units will be taken offline as they are vacated.

Objective: Increase Housing Choice Voucher Budget Utilization

Progress: Utilization rate was impacted by the restrictions and challenges presented by the COVID-19 pandemic. For example, offices were closed to the public, stay at home orders were in place throughout the fiscal year, and staff capacity was reduced by 50%. In FY 2022, the OHA contracted NanMckay and Associates Inc. to provide the temporary staffing support necessary to address work backlogs. Three simultaneous efforts are underway to increase utilization: the increase of the Payment Standard (maximum amount of rent paid for a unit on the Section 8 program) to 110% of the fair market rents published by the Department of Housing and Urban Development (agencies pay between 90% to 120% based on their local rent market needs); acceptance of rent increases (rent increases were halted during the pandemic); and efforts to increase the number of new vouchers issued.

Objective: Create a Housing Navigation team

Progress: Housing Locator position was created to provide field-based housing location services to program participants. The Housing Locator works closely with participants and their case workers in the rental process. The Housing Locator maintains and coordinates communication, between participants, landlords, property managers, case workers, community partners, and staff. In addition, a partnership with Ventura County United Way was established to leverage the various landlord incentive programs for homeless individuals and families they offer which in turn helps OHA's voucher holders to secure units.

PHA Goal Two: Expand Family Self-Sufficiency (FSS) Program

Objective: Increase program participation

Progress: Fiscal years 2020 and 2021 presented a challenge to the OHA's efforts to increase FSS program participation. Offices were closed to the public making it necessary to move towards on-line recertifications. In fiscal year 2022, HUD published mandated updates to the FSS program which resulted in a temporary suspension of new admissions to the program. The OHA shifted focus to completing the necessary legwork to ensure the program meets compliance requirements and that all policies and procedures are up to date with new federal regulations. Staff is also working on educating program participants on the new changes. The OHA will shift its focus to new admissions upon completion of transition of any existing participants who wish to enter into a new contract.

Objective: Expand the scope and types of services offered to participants. For example: job training and educational programs that will increase self-sufficiency and income generation

Progress: Efforts had been placed on hold due to COVID-19 restrictions. However; the OHA worked with community partners to bring COVID-19 related relief and assistance programs to participants and residents. The OHA partnered with the Ventura County Credit Union and the Housing Authority of the City of San Buenaventura to offer money management workshops (virtually). The OHA is also working on a Memorandum of Understanding with the Oxnard Adult School to offer ESL Classes and Digital Literacy courses for public housing residents and program participants. In FY 2022, the OHA launched its scholarship program and awarded 3 scholarships to youth who are pursuing a higher education and live in Public Housing or their household is part of the Section 8 program. College preparation workshops are also offered in partnership with Oxnard College and California State University Channel Islands.

Objective: Build new partnerships with employers and service providers

Progress: Efforts have been negatively impacted due to COVID-19 restrictions in place. However; the OHA partnered with Amazon to host multiple job fairs in 2021. The OHA partnered with Embassy Suites by Hilton, Boys & Girls Clubs of Greater Oxnard and Port Hueneme, Gold's Gym, and the United States Census 2020 to host a community wide job fair in 2020. In 2022, the OHA partnered with Southwest Carpenters, who will be offering paid apprenticeships, with employment guarantee, at no cost to interested Section 8 and Public Housing program participants.

Objective: Revamp marketing efforts

Progress: Efforts have been placed on hold until all COVID-19 restrictions are lifted. However; electronic and mailers continue to be sent.

Objective: Increase progress meetings with program participants

Progress: Virtual and telephone meetings are held with program participants, however; staff has now begun holding one on one meetings with program participants.

PHA Goal Three: Supportive Services for Residents

- Objective:** Resident Opportunities and Self-Sufficiency (ROSS) program Coordinator to expand coordination of self-sufficiency services to each project site
- Progress:** Efforts have been placed on hold until all local COVID-19 restrictions are lifted. However; a community survey is being completed to gather the necessary data on the needs of each project site and to identify activities that will have the greatest impact in helping residents increase self-sufficiency. All new efforts described under PHA Goal two for the Family Self Sufficiency (FSS) program have been launched in collaboration with the ROSS program coordinator.
- Objective:** Increase collaboration between ROSS and FSS activities
- Progress:** ROSS activities have been focused primarily on coordinating programs and services that assist residents and program participants to navigate the impact of COVID-19. As the pandemic has begun to subside, the activities hosted by the ROSS program are being reinitiated. The FSS program coordinator is working closely with the ROSS program coordinator to promote collaboration of new activities.
- Objective:** Leverage capacity with resident advisory board teams to increase participation and outreach
- Progress:** This objective was on hold due to COVID-19 restrictions. In January 2023, the OHA began efforts to increase resident participation in the resident advisory board and is holding elections to fill vacancies within each tenant association. The tenant associations are made up of public housing residents who work in partnership with the OHA to identify and address the needs of residents. Once in-person meetings are resumed, participation is expected to increase.

HUD Strategic Goal #2: Reduce Homelessness

PHA Goal One: Increase percentage of admissions to mainstream housing programs

- Objective:** Apply for Mainstream Vouchers
- Progress:** The OHA was awarded 40 vouchers.
- Objective:** Establish partnerships with local Health and Human Service Agencies
- Progress:** The OHA is working in partnership with the Ventura County Human Services Agency.
- Objective:** Partner with Community Service Agencies throughout the Ventura county that offer homeless programs
- Progress:** The OHA hired a full-time Homeless Assistance Program Coordinator who is working with community service agencies to provide an array of services to our homeless population. For example, OHA partnered with the Ventura County and Salvation Army to implement a "One Stop" program that provides services in areas frequented by non-housed homeless individuals.
- Objective:** Collaborate with Ventura County's Continuum of Care to establish a referral system
- Progress:** The OHA has established a referral system with the Ventura County's Continuum of Care agency.

PHA Goal Two: Set Aside Homeless Voucher Program

Objective: Increase utilization of homeless set aside vouchers

Progress: Homeless Services Coordinator position has been filled and a Housing Navigation Locator position has been created. The issuance of homeless set aside vouchers was decreased due to the decreased capacity that has stemmed from COVID-19 restrictions in place. However; in FY2022, all vouchers were issued or committed. The OHA is seeking new funding opportunities to increase the allocation of vouchers.

Objective: Establish MOU with Supportive Services Provider

Progress: The OHA has established a referral system with the Ventura County's Continuum of Care agency. In addition, the OHA is working with United Way of Ventura County to explore possibilities of increasing supportive services through their homelessness initiatives.

Objective: Develop a plan to move homeless applicants from shelter to permanent housing

Progress: The OHA is currently working with Ventura County, the Salvation Army, the Ventura County Workforce Development Board and the Ventura County's Continuum of Care to establish a program that will move individuals from homelessness to permanent housing via the use of Mainstream vouchers, Veterans Affairs Supportive Housing (VASH) vouchers, and Homeless set aside vouchers.

PHA Goal Three: VASH Program

Objective: Increase utilization of Veterans Affairs Supportive Housing (VASH) vouchers

Progress: The OHA is working with the U.S. Department of Veterans Affairs' regional office to discuss ways in which referrals can be increased for the VASH program. In addition, the OHA has committed vouchers to new developments that will serve the Veteran population. The OHA has less than 10 vouchers available.

Objective: Increase collaboration efforts with local VA clinic to identify eligible Veterans

Progress: The OHA is working with U.S. Department of Veterans Affairs' regional office includes reaching out to the local VA clinic to increase referrals.

PHA Goal Four: Build a Navigation Center

Objective: Increase street outreach and case management

Progress: The OHA hired a Homeless Assistance Program Coordinator dedicated to coordinate both street outreach and case management. In partnership with the Salvation Army, street outreach services have been expanded throughout the OHA's jurisdiction.

Objective: Lead the operation of the city owned navigation center

Progress: Construction of Navigation Center began in FY 2022.

Objective: Establish partnerships with recuperative care, supportive service, and permanent housing providers

Progress: The OHA has established partnerships with multiple community service providers to assist in the efforts of connecting homeless individuals with supportive services. For example, the "One Stop" program which brings services to areas that are frequented by non-housed homeless individuals. The OHA also launched an encampment response plan to address a large homeless encampment site. A variety of services are being offered onsite including: hygiene services, outreach, and case management.

HUD Strategic Goal #3: Enhance Rental Assistance

PHA Goal One: Transition public housing to a more sustainable platform

Objective: Expand the rehabilitation of existing housing

Progress: Improvements to public housing units include:

- Rehabilitation of exterior walls for OHA's turn key units (Projects located on Fremont, Althea, Hill, Fashion Park, Concord and Cuesta Del Mar) which included scrapping all peeling paint, filling in cracks, paint exterior walls, fascia and all exterior doors as well as carport posts and trash enclosures; the removal and replacement of all cracked concrete in backyard patios
- Flooring replacement for the Felicia project (100 units located on Felicia Court)
- Toilet sensor project for the Felicia project (100 units located on Felicia Court) and the Colonia project (70 units located on Colonia Road) which involved installation of toilet sensors to detect leaks or running toilets
- Kitchen cabinet replacement project for the Palm Vista Project (100 units located at 801 S. C St) which included the replacement of cabinets, plumbing fixtures, sink and range hood
- Boiler replacement project for the Plaza Vista Project (100 units located at 401 S. C St) which included replacement of both heater and domestic hot water heater boilers, holding tank, and all plumbing up to the walls
- Alley way pavement repairs for the Fashion Park project (24 units located on Fashion Park Place)
- Replaced all of the common area lighting with LED light fixtures for both Palm Vista Project (100 units located at 801 S. C St) and the Plaza Vista Project (100 units located at 401 S. C St)
- Replaced fire sprinklers for both Palm Vista Project (100 units located at 801 S. C St) and the Plaza Vista Project (100 units located at 401 S. C St)
- Painted the interior common walls/hallways for the both Palm Vista Project (100 units located at 801 S. C St) and the Plaza Vista Project (100 units located at 401 S. C St)

Currently, the OHA is working on:

- Replacing the electrical panels and drain lines at the Plaza Vista Project (100 units located at 401 S. C St)
- Two construction phases of the 504-compliance project (this project refers to number of units the OHA must have in its inventory that have been adapted to meet the needs of disabled persons) will be completed in the first quarter of calendar year 2023, specifically 2 units at the Pleasant Valley project (5191 and 5201 Squires Drive) are being split to 4 accessible units and 5 units at the Palm Vista (located at 801 S. C St.) project will be modified.

Objective: Increase value of OHA's real property asset portfolio

Progress: The OHA will continue monitoring the private market for opportunities to expand its current property asset portfolio. In fiscal year 2022, the OHA increased its portfolio by acquiring a 4-unit apartment complex located at 1250 Azalea St, a 4-unit apartment complex located at 2051 Mariposa St, and a single-family residence located at 3139 S. J St. All of the units are leased by low income families.

- Objective: Merge Capital Fund and Maintenance Teams
 Progress: The Capital Fund team has been realigned and now reports to the Maintenance Department. The synergies between both teams offer the added benefit of ensuring that the ongoing maintenance needs of projects are factored in when capital improvement decisions are made. In addition, the capital fund team now has access to additional project management support.
- Objective: Transition Public Housing Units with significant unmet capital needs to Rental Assistance Demonstration Program (RAD) or Project Based Projects
 Progress: The OHA launched the effort titled “Rethink and Renew” to restructure operations. As part of the effort, the OHA submitted a technical assistance and capacity building engagement grant request to the Department of Housing and Urban Development (HUD). The request was approved. HUD assigned the consultant, CVR Associates, Inc. to complete an analysis and issue a repositioning report tailored to OHA. The term repositioning refers to changing the funding structure for the units currently owned by the OHA under the Public Housing Program to a Section 8 subsidy. This change will provide for a more stable stream of funding and also allow the OHA to leverage funds for rehabilitation of its units. The OHA intends to move forward the preliminary repositioning activities in fiscal year 2023.

HUD Strategic Goal #4: Streamline Operations

PHA Goal One: Reduce administrative burden

- Objective: Participate in HUD’s Moving to Work Demonstration Cohort program
 Progress: On Hold. Due to COVID-19 indirect and direct impact to operations, the OHA is focusing on resuming to normal operations.
- Objective: Streamline processes and procedures for annual and re-certifications
 Progress: The OHA has launched an on-line, web-based recertification portal for Public Housing residents. In FY 2022, the OHA moved to on-line recertifications for the Housing Choice Voucher program.
- Objective: Implement consistent forms, letters, and notices for all programs
 Progress: The OHA has begun standardizing forms for the Public Housing Program. A committee of staff members has been established to review notices before they are released to residents. Once finalized, forms will be standardized for the Housing Choice Voucher Program.
- Objective: Develop strategies to reshape workforce capacity
 Progress: The COVID-19 pandemic required for the OHA to shift focus from identifying streamlining opportunities to establishing immediate processes to minimize the impact to delivery of services. However; the OHA has resumed normal operations, filled all vacant positions, has training efforts underway, and is working on standardizing procedures.
- Objective: Identify and eliminate administrative practices not required by HUD
 Progress: The COVID-19 pandemic required for the OHA to shift focus from identifying streamlining opportunities to establishing immediate processes to minimize the impact to delivery of services. Effort has been relaunched and has a target completion date of FY2023.

PHA Goal Two: Improve customer service

Objective: Deliver services more efficiently

Progress: The OHA launched the effort titled “Rethink and Renew” to restructure operations. The goal is to improve landlord and tenant relations and customer service. Although the COVID-19 pandemic temporarily halted the efforts, the task is underway.

Objective: Reduce turnaround time-frames for reasonable accommodation requests

Progress: Reasonable accommodation requests are reviewed and dispositioned within 48-72 hours from receipt. If an accommodation exceeds the approval authority level of the Program Supervisor, it is submitted within 24 hours to the Housing Programs Manager for review so that the response is not delayed.

Objective: Move towards on-line web-based applications

Progress: Completed. The OHA launched an on-line applications and resident’s web-based portal.

Attachment C.1 (b)
Resident Advisory Board Comments

HOUSING AUTHORITY OF THE CITY OF OXNARD
ANNUAL AGENCY PLAN PROPOSED CHANGES
SUMMARY OF TENANT COMMENTS

Although no written comments were received, the following is a summary of the verbal comments received at the Resident Advisory Board (RAB) Meetings (summarized):

Comment: The homeless preference is for the same program that has been in existence for many years?

Response: There has been a homeless set aside program for the past 7 years. The program allows for 15 vouchers to be designated for homeless individuals and families per year. However; due to the way the program was set up, it is not possible to open the waitlist once the entire waitlist has been exhausted and vouchers are still available. By adopting a preference, there will be a mechanism to identify eligible applicants and the OHA will be able to open the waitlist for this preference, if needed. This preference was proposed to the RAB in 2021 and temporarily adopted, in accordance with the waivers published by the Department of Housing and Urban Development under Notice PIH 2021-14 (HA), as a response to the COVID pandemic. The temporary waivers have expired; therefore, the OHA is proposing to formally adopt the preference to the Housing Choice Voucher Program Administrative Plan. This action requires presenting before the committee and Board of Commissioners.

Comment: Can the capital fund be used to paint the interior of all public housing units?

Response: A portion of the Fiscal Year 2023's Capital Fund Budget is going towards repairs and improvements needed in preparation for inspections that the Department of Housing and Urban Development is conducting. If a unit requires painting due to normal wear and tear, it will be completed. In addition, public housing residents need to report their requests for their individual units by placing a work order, the unit will be assessed to determine corrective action.

Administrative Plan

Electronic copy of Administrative Plan is located on OHA's website:

<https://www.oxnard.org/city-department/housing/section-8/admin-plan/>

Admissions and Continued Occupancy Plan

Electronic copy of Administrative Plan is located on OHA's website:

<https://www.oxnard.org/city-department/housing/public-housing/acop/>

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, Emilio Ramirez ,
Official's Name

the Housing Director
Official's Title

certify that the 5-Year PHA Plan for fiscal years 2020-2025 and/or Annual PHA Plan for fiscal year 2023 of the Housing Authority of the City of Oxnard is consistent with the
PHA Name

Consolidated Plan or State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

City of Oxnard

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The PHA's goals and objectives are aligned with the Consolidated Plan. Specifically, on section AP-20 of the plan. The PHA is working on improving supply of affordable rental housing inventory, reducing homelessness, and increase in availability of social services.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official:

Emilio Ramirez

Title:

Director of Housing and Redevelopment

Signature:

Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Certifications of Compliance with PHA Plan and Related Regulations (Standard, Troubled, HCV-Only, and High Performer PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ___ 5-Year and/or X Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning **2023**, in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
 10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
 11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
 12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
 13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
 14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
 15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
 16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
 17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
 18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
 19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
 20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
 21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
 22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Oxnard

PHA Name

CA 031

PHA Number/HA Code

X Annual PHA Plan for Fiscal Year **2023**

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Executive Director:

Emilio Ramirez

Signature

Date

Name Board Chairman:

John C. Zaragoza

Signature

Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

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Oxnard Housing Authority Repositioning Report



Prepared By: CVR Associates, Inc.

October 2021



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Section 1: Introduction

The Housing Authority of the City of Oxnard (HACO) is in Ventura County, California and manages 520 public housing units, under an Annual Contribution Contract (ACC) with HUD, and administers 1,840 Housing Choice Vouchers (HCV).

HUD issued work plan number CVR-O-19-07-04 Oxnard Asset Repo to CVR Associates, Inc. (CVR) to provide technical assistance to HACO. As a part of this work plan, CVR has been tasked with assisting HACO develop an Asset Repositioning Plan to transition from their Public Housing portfolio from the public housing program to a Section 8 based subsidy.

Key Considerations for Repositioning

1. Conversion to a Section 8 project-based subsidy platform will provide a more stable stream of subsidy that will enhance the long-term viability of the portfolio.
2. Repositioning HACO public housing assets will not reduce the number of units in the inventory.
3. Conversion to a Section 8 project-based platform is more conducive to raising debt and equity.
4. Non-RAD PBV rents are greater than RAD rents for HACO.
5. HACO does not have sufficient public housing funds available to make the necessary renovations the units are projected to need over the next ten years.
6. Using long-term debt could leverage HACO funding and provide additional funding for rehabilitation of the units.

Section 2: Background

HACO Public Housing Portfolio

HACO's public housing portfolio is located within the City of Oxnard. A summary of the current Oxnard public housing portfolio units by bedroom size is outlined below.

Development	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	Total
Felicia Court	-	-	24	60	14	2	100
Colonia Road	-	-	18	30	20	2	70
Pleasant Valley Village	-	10	36	38	12	4	100
Plaza Vista Senior Apartments	18	32	-	-	-	-	50
Althea Court	-	-	8	4	6	2	20
Hill Street	-	-	4	4	4	-	12
Fashion Park Place	-	-	8	8	5	3	24
Concord Drive	-	0	8	4	6	2	20
Cuesta Del Mar	-	-	4	4	3	1	12
Fremont Square	-	-	4	4	4		12
Palm Vista Senior Apartments	-	100	-	-	-	-	100
Total	18	142	114	156	74	16	520

Demolition of the 146-unit Colonia Village public housing site was completed in 2019 and is not included in the above summary.

Section 504 Compliance and Conversion Plan

HACO currently has a Section 504 Conversion Plan that will increase the number of Section 504 mobility impairment units by 25 as outlined below

- Pleasant Valley Village - 4 units
- Colonia Road - 4 units
- Scattered Sites properties - 6 units
- Palm Vista Senior Apartments - 11 units

The plan also includes making the 11 units at Palm Vista Senior Apartments compliant with respect to Section 504 requirements for audio and visual impairments. HACO believes the recent demolition of The Court (Cal 31-1), which significantly reduced the number of accessible units in the inventory, has necessitated the requirement to quickly produce additional accessible units

The new unit mix based on the implementation of the current 504 conversion plan, would be as follows:

Development	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	Total
Felicia Court	-	-	24	60	14	2	100
Colonia Road	-	4	22	30	18		74
Pleasant Valley Village	-	12	38	38	12	2	102
Plaza Vista Senior Apartments	18	32	-	-	-	-	50
Althea Court	-	-	8	4	6	2	20
Hill Street	-	-	4	4	4	-	12
Fashion Park Place	-	3	11	8	5	0	27
Concord Drive	-	2	10	4	6	0	22
Cuesta Del Mar	-	-	4	4	3	1	12
Fremont Square	-	-	4	4	4		12
Palm Vista Senior Apartments	-	100	-	-	-	-	100
Total	18	153	125	156	72	7	531

We have used the current 504 conversion plan's unit mix above in our financial projections for this repositioning report.

However, we believe the current Section 504 Conversion Plan, combined with existing accessible units would result is a unit distribution that does not appear to meet the requirements of 24 CFR Part 8.26:

“Distribution of Accessible Dwelling Units (accessible dwelling units shall, to the maximum extent feasible, be distributed throughout projects and sites and shall be available in a sufficient range of sizes and amenities so that a qualified individual with handicaps’ choice of living arrangements is, as a whole, comparable to that of other persons eligible for housing assistance under the same program).”

As part of the repositioning efforts, CVR recommends that HACO reassess the existing 2018 Section 504 conversion plan to ensure the reconfiguration is consistent with the requirements of 24 CFR Part 8 as part of the Asset Repositioning plan. This may result in increased costs which would require revisions to the financial analysis. Further details were provided under separate cover.

Capital Needs

Ameresco completed an “Asset Management Plan” in 2012 for HACO’s public housing inventory. While this plan was not completed in the typical HUD Physical Needs Assessment format, it did identify projected physical component replacement needs of the HACO units through 2041. The report identified approximately \$62.4 million of physical component replacements needed between 2020 and 2041. It does not appear that the Ameresco assessment considered any

potential hazardous materials abatement, other environmental abatement required, or accessibility improvements needed.

Under separate cover, CVR has provide recommendations regarding HACO's capital needs. Below is a breakdown of the estimated capital need cost for each property.

Property	Immediate Needs	Year 1-5	Years 6-10	Years 11-15	Years 16-20	Total Capital Needs
Felicia Court	1,624,189	2,447,714	828,352	1,246,964	1,536,969	7,684,188
Colonia Road	1,386,196	2,537,358	1,712,433	3,505,718	2,020,893	11,162,598
Pleasant Valley Village	950,423	3,586,916	1,214,482	5,697,002	4,120,229	15,569,051
Plaza Vista Senior Apartments	623,342	1,340,000	2,550,000	452,633	1,716,240	6,682,215
Althea Court	487,500	267,147	20,000	263,608	368,000	1,406,255
Hill Street	822,568	459,573	33,746	449,205	620,933	2,386,026
Fashion Park Place	983,429	585,229	40,346	554,976	742,363	2,906,343
Concord Drive	892,813	496,219	36,628	486,263	673,959	2,585,882
Cuesta Del Mar	487,149	271,887	19,986	265,889	367,735	1,412,645
Fremont Square	487,500	274,155	20,000	267,119	368,000	1,416,774
Palm Vista Senior Apartments	290,359	2,483,885	3,599,940	1,774,403	1,053,085	9,201,672
Total	9,035,469	14,750,083	10,075,913	14,963,779	13,588,406	\$62,413,650

CVR also conducted a visual assessment of properties and the overall impression from the on-site visit was that HACO takes significant pride in the care, maintenance, and upkeep of the properties and no significant, immediate physical deficiencies were observed during our limited assessment.

In addition, the most recent REAC inspection reports identified several health and safety deficiencies, including the condition of doors and their ancillary components at multiple properties including apartment and common area doors at the Plaza Vista and Palm Vista high-rise buildings.

Systemic, Health and Safety items, and potential Capital Needs items identified in the REAC inspections may also warrant increased attention prior to and while developing the scope of repositioning work. These items include:

- Site work including landscape, erosion, overgrown vegetation, and fencing and gates. This was also an item mentioned as high-priority by HACO staff during the on-site visit.
- Clogged drain lines, which were also mentioned in the on-site visit as a high-priority item by HACO staff.

- Foundation cracks and rotted subfloor at Felicia Court Building 48, Building 144 – 3010 Turnkey Scattered Sites, and Building 146 – 2950 Turnkey Scattered Sites.

We assumed most of the Ameresco work identified through 2019 has been addressed. For purposes of estimated construction costs, we used the costs for years 2020 through 2031. Due to the age of the Ameresco report, CVR increased these costs by 30%. This should account for inflation and any potential hazardous materials abatement, 504 conversion revisions needed or other unknown factors. A summary of the estimated needs for each HACO property is outlined below:

Property	Construction Cost	Per Unit	HCC
Felicia Court	9,770,236	97,702	60%
Colonia Road	10,127,942	136,864	85%
Pleasant Valley Village	11,915,742	116,821	77%
Plaza Vista Sr.	4,816,510	96,330	91%
Althea Court	1,186,941	98,912	60%
Hill Street	2,002,392	100,120	60%
Fashion Park Place	2,467,486	91,388	60%
Concord Drive	2,170,010	98,637	64%
Cuesta Del Mar	1,201,092	100,091	60%
Fremont Square	1,189,052	99,088	60%
Palm Vista Sr.	10,763,784	107,638	91%

In addition to the HACO recommended unit repairs, the Ameresco report also identified almost \$1 million of repairs would be need for the administrative buildings over the next 20 years.

Current Housing Authority Funding Available

Capital Fund Program Funds

HUD provides capital fund grants to Housing Authorities annually through its Capital Fund Program (CFP) for the development, financing, and modernization of public housing developments. However, the funds may not be used for luxury improvements, direct social services, cost funded by other HUD programs, and ineligible activities as determined by HUD on a case-by-case basis.

In addition, Housing Authorities may use up to 10% of their annual CFP allocation for CFP-related administrative costs and 10% for management improvements. CVR has projected a total

of 25% of each projected annual CFP allocation would be utilized for these items in this repositioning report.

CFP regulations require housing authorities to obligate their annual CFP fund allocation within 2 years of receipt and to expend the fund within 4 years. HUD may extend the PHA's obligation date for Capital Fund used in a RAD conversion for up to thirty-six months from the previous obligation end date and the expenditures end dates will be correspondingly extended.

Below is a chart of CFP fund allocations HACO has received over the past 5 years and the amounts obligated and spent for each allocation as of September 30, 2021

Calendar Year award	CFP	Obligated	Expended	Available
2017	1,486,849	1,486,849	1,486,849	-
2018	2,180,463	2,063,671	1,247,774	116,792
2019	2,165,525	615,337	443,094	1,550,188
2020	2,143,230	611,034	410,743	1,532,196
2021	2,384,050	-		2,384,050
Total	10,360,117	4,776,891	3,588,459	5,583,226

CVR has utilized the unobligated balances as of September 30, 2021, as available funding for this Repositioning Report. We have also utilized the 2021 CFP grant amount as the projected CFP funding base amounts for the next 5 years. These amounts will be reduced proportionately as units are repositioned from the public housing subsidy platform to Section 8 voucher subsidy platform.

Demolition and Disposition Transitional Funding

HUD provides housing authorities with a formula-based add-on to their CFP grants for 5 years after a PHA has removed units from its inventory because of HUD-approved demolition or disposition. These CFP add-ons are called Demolition and Disposition Transitional Funding (DDTF) and have the same restrictions as Capital Funds. These funds are not awarded for RAD conversions.

CVR has incorporated these funds currently being received for demolished units at Colonia Village. In addition, we have incorporated projected DDTF funds received through the repositioning of other public housing units.

Operating Reserve Funds

Pursuant to PIH Notice 2019-23 RAD Notice Rev 4, PHAs are permitted to use available public housing funding, including Operating Reserves, Capital Funds, and Demolition and Disposition Transitional Funding as source of capital in the development budget to support conversion,

whether for rehabilitation or new construction, as well as to increase initial contract rents, Eligible conversion-related uses for these funds include pre-development, development, or rehabilitation costs of the Development, establishment of capital replacement reserve or operating reserve, payment of Capital Fund Financing Program (CFFP), Operating Fund Financing Program (OFFP), or Energy Performance Contract (EPC) debt, and increase of the initial contract rent.

Operating Reserves are not allowed as development source for units that are repositioned under Section 18 only and are not part of a RAD conversion. Those funds must be spent prior to conversion under Section 18.

As of June 30, 2021 HACO had a significant amount of Reserve Funds that could be used for repositioning activities. The Financial Data Schedule, shows HACO has **\$8.3M** in unrestricted Excess Cash/cash reserves, in the LIPH program as outlined below.

AMP	Felicia Court	Colonia Road	Pleasant Valley Village	Plaza Vista Sr.	Scattered Sites	Palm Vista Sr.	Total
Excess Cash	1,784,834	1,364,854	1,630,593	738,226	1,457,948	1,365,463	8,341,918

PHAs are prohibited from using Operating funds on the capital improvements, including operating reserves, at the Public Housing units unless those Developments are undergoing a RAD conversion.

Althea Court Insurance Funds

HACO has approximately \$1.6M of insurance funds remaining in restricted assets due to of a fire that burned down an 8 unit building at Althea Court. These funds have been incorporated into the financial projections to support the new construction of the 8 units.

Section 3: Repositioning and Recapitalization

HUD defines Repositioning as the removal of a property from the Public Housing Section 9 subsidy platform either through RAD, Section 18 Demolition/Disposition, Section 22 Voluntary Conversion, Section 33 Required Conversion, or Section 32 Homeownership and replacing it with Section 8 assistance. In most cases, this conversion is intended to preserve the assets as long-term affordable housing although, in some instances, repositioning can also mean the conversion to tenant based assistance or the sale of Public Housing units to low-income homebuyers and the award of replacement vouchers.

HUD defines Recapitalization as the use of current agency funds or third-party sources to complete necessary physical improvements to a Public Housing property, often by leveraging the Section 8 rental assistance. Recapitalization can be achieved using PHA funds, (Operating Subsidies and Capital Funds), LIHTC, private debt, state and local funding, grants, and in limited cases, Historic and New Market tax credits. It is possible for a housing authority to reposition its public housing inventory to Section 8 without recapitalization, but given the significant physical needs of HACO's units, recapitalization should also be done in conjunction with the repositioning.

Program Characteristics

There are several Program Characteristics for each repositioning option that must be considered when evaluating a property for repositioning including, but not limited to:

- Tenant Protection Vouchers
- Demolition and Disposition Transition Funds
- Asset Repositioning Fees
- Resident Rights
- Replacement Housing Requirements
- Disposition Requirements
- Use of Sales Proceeds
- Use of Public Housing Program Funds
- Tenant Consent to Project Base Vouchers
- Public Housing Closeout Requirements
- Faircloth Impacts

HUD's "Repositioning Options: Summary of Key Characteristics" chart (Exhibit A) provides a summary of these program characteristics for each of repositioning option.

Rent Analysis

RAD

Generally, the best Repositioning options chosen, considering characteristics for each option, is primarily determined by the option that provides the highest rent resulting in a higher net income that can be leveraged to maximize the levels of debt and equity that can be achieved.

The contract rent for converting to RAD is determined by the Housing Authority's current funding. The current funding is based on the sum of the following:

- Per unit monthly (PUM) subsidy eligibility at full occupancy under the Operating Fund program, based on the current year's Operating Fund appropriation (incorporating any pro-ration and excluding Asset Repositioning Fee);
- The amount of the PHA's Capital Fund Formula Grant attributable to the standing units at the project (i.e., excluding DDTF), divided by the units recognized under the Capital Fund Formula, i.e., "standing units", divided by twelve; and
- PUM adjusted formula income under the Operating Fund program, i.e., tenant rent.

The rents are adjusted annually through HUD's automated Operating Cost Adjustment Factor (OCAF) and updated in a RAD Rent Schedule every 2 years. The most recent RAD Rent Schedule was published in December 2020 and included an OCAF for 2021 as outlined below.

Development	PIC Number	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom
COLONIA VILLAGE	CA031000001	\$541	\$648	\$820	\$1,147	\$1,360	\$1,564
COLONIA VILLAGE	CA031000002	\$534	\$639	\$809	\$1,132	\$1,342	\$1,543
COLONIA VILLAGE	CA031000003	\$554	\$663	\$839	\$1,173	\$1,391	\$1,600
PLEASANT VALLEY	CA031000004	\$537	\$642	\$813	\$1,138	\$1,349	\$1,551
PLAZA VISTA	CA031000005	\$709	\$849	\$1,074	\$1,503	\$1,782	\$2,049
OXNARD TOWNHOMES	CA031000007	\$588	\$704	\$891	\$1,247	\$1,478	\$1,700
PALM VISTA	CA031000008	\$662	\$793	\$1,004	\$1,404	\$1,664	\$1,914
RAD AVERAGE		\$589	\$705	\$893	\$1,249	\$1,481	\$1,703

When the Housing Authority converts under RAD, it must choose between converting the property under Project Based Rental Assistance (RAD PBRA) or Project Based Vouchers (RAD PBV) to determine the initial contract rent.

RAD PBV. If the Housing Authority converts under PBVs, the rent is set at the **lower** of 110% of the FMR, Reasonable Rent, or RAD contract rent. Based on the current RAD Contract rent

and the FMRs for Ventura County, the initial contract rent would be set at the RAD rents as outlined above, subject to a Rent Reasonableness study.

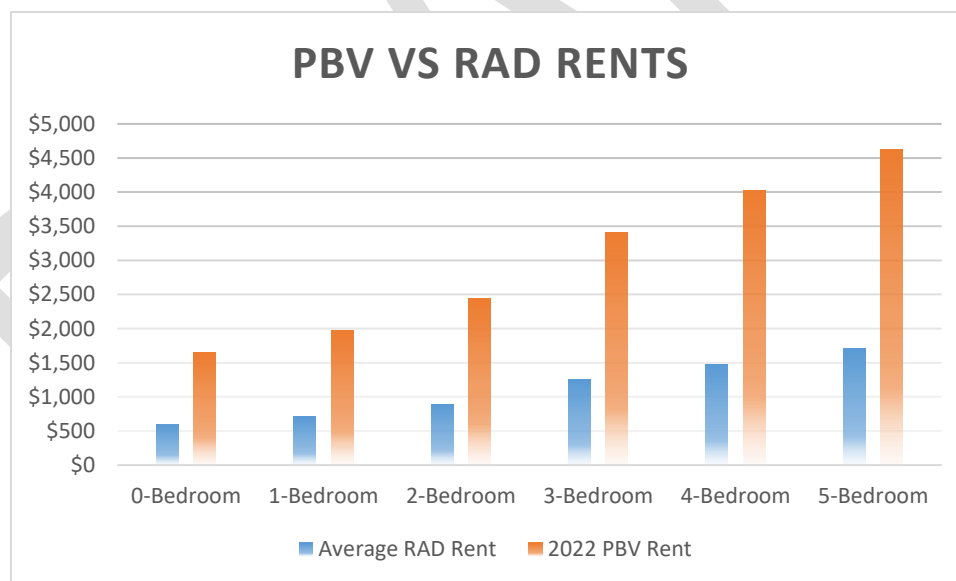
RAD PBRA. Under the PBRA option, the RAD vouchers would be administered by a 3rd Party. The initial contract rent would be set at the **lower** of 120% of the local Fair Market Rents (FMR) or the RAD contract rent and would not be subject to Rent Reasonableness. Based on the current RAD Contract rents and the FMRs for Ventura County, the initial contract rent would be set at the RAD rents.

NON-RAD PBV Rents

PBVs can also be applied to units without using RAD. The maximum approvable rents for Non-RAD Project-Based Vouchers in Oxnard, CA are significantly higher than the current RAD PBRA/PBV options. They can be set at up to 110% of the Fair Market Rent (FMR) as long as the proposed rents are reasonable as compared to similar market rate units.

Below are the potential PBV rents:

Development	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom
2022 HUD FMR	\$1,507	\$1,792	\$2,218	\$3,101	\$3,655	\$4,203
Non-RAD PBV RENTS	\$1,658	\$1,971	\$2,440	\$3,411	\$4,021	\$4,623



Due to the higher Non-RAD PBV rents, CVR recommended Non-RAD approaches wherever possible in this repositioning report to ensure the best operating cash flows for each project and to support debt service for potential funding gaps. It is important to also note that since HACO manages a voucher program, HACO would earn administrative fees on the new vouchers.

Section 4: Repositioning Options

HUD provides four main options for converting Public Housing to Section 8, which can often be used in combination:

- The Rental Assistance Demonstration Program (RAD).
- The Section 18 Demolition or Disposition.
- The Streamlined Voluntary Conversion (SVC).
- The Section 32 Homeownership Program.

Rental Assistance Demonstration (RAD)

HUD's RAD program provides a Housing Authority the ability to convert their public housing and other HUD-assisted properties to long-term, project-based Section 8 rental assistance to achieve the preservation and improvement of their housing stock by enabling access to the private and public debt and equity market to address immediate and long-term capital needs. Additionally, the RAD program provides a 20-year Housing Assistance Payment (HAP) contract that provides stability in the funding source for the Housing Authority. RAD conversions can be accomplished utilizing several approaches. CVR has provided a financial comparison of each option in Exhibit B. Based on this analysis, the RAD/Section 18 Blends provide the best RAD alternatives for HACO due to the level of construction.

PIH Notice 2021-07 provides the latest guidance for RAD/Section 18 Blends. There are two types of RAD/Section 18 Blends.

- **RAD/Section 18 Small PHA Blend.** For any PHA with 250 or fewer Public Housing units, up to eighty percent (80%) of the units in a Converting Project may be disposed of under Section 18. To be eligible, the PHA must submit a feasible repositioning plan approved by the PHA's Board of Commissioners and acceptable to HUD that removes all of a PHA's Public Housing ACC units, reflects that the PHA will not develop additional Public Housing units and will result in the closeout of the PHA's Section 9 Public Housing Program and termination of its Section 9 ACC. Additionally, any PBV contract created under this Section 3(a)(3)(c) must be administered by an HCV contract administrator with at least 250 HCV units under its HCV ACC prior to creation of such PBV contract.
- **RAD/Section 18 Construction Blend.** To be eligible for the construction blend, the proposed transaction may not use 9% tax credits. The RAD/Section 18 Construction Blend is a tiered system for determining the percentages of RAD and Non-RAD PBVs that can be received based on the amount of actual construction costs, inclusive of General Condition, Overhead, and Profit, as a percentage of HUD's Hard Construction Costs (HCC). The percentages of HCC and associated RAD/Section 18 Construction Blends are outlined below.

RAD / Section 18 Blend	
Required HCC Threshold	RAD / Section 18 Blend Percentage
>30%	80% RAD / 20% Section 18
>60%	60% RAD / 40% Section 18
>90%	40% RAD / 60% Section 18
>90% + high-cost area*	20% RAD / 80% Section 18

*Oxnard is not considered a high-cost area.

Section 18 Demolition/Disposition

HUD PIH Notice 2021-07 provides guidance on the requirements to request HUD approval to demolish and/or dispose of public housing property under Section 18 of the U.S. Housing Act of 1937, as amended, as well as related Tenant Protection Voucher (TPV) eligibility for such actions.

If approved, the Housing Authority could convert the TPVs issued to project-based vouchers (PBVs) which have higher rents. This would allow the Housing Authority to raise additional debt to address construction cost and potential gaps.

Another key feature of Section 18 Disposition is the eligibility for phase-out funding under the Operating Fund and Capital Fund programs, called, respectively, Asset Repositioning Fees (ARF) and Demolition Disposition Transition Funds (DDTF). ARF funds provide for a declining phase-out of operating subsidies over two years (if disposition) or three years (if demolition). Under DDTF, the Capital Fund Grant is continued for five years without any phase down.

Under the Notice, HUD describes seven separate ways that a public housing project can qualify for disposition under Section 18 (See Exhibit C). We believe the two most likely ways HACO units could be approved for disposition are summarized below.

- **Scattered Site Units**

Due to the distance between units and lack of uniformity of systems (e.g. HVAC, utilities), the PHA demonstrates an unsustainability to operate and/or maintain the units as public housing. For purposes of this notice, scattered site unit generally mean units in non-contiguous **buildings with four or fewer total units**. CVR is recommending this approach for the 12 Scattered Site Oxnard Townhome units at Cuesta del Mar.

- **RAD / Section 18 Small PHA Blends**

The 2021-07 PIH Notice also allows Housing Authorities with 250 or fewer public housing units to convert up to 80% of its units to PBV. Given the higher PBV levels for Oxnard, this approach would allow each property to support additional debt. However, since

HACO currently has 520 ACC units, the Housing Authority would need to reposition at least 270 ACC units before it could qualify for this option.

For purposes of this report, CVR is recommending utilizing this approach for units that qualify due to the difference in the funding gap and ability to develop with limited need for tax credit equity.

It is important to note that this approach would result in the closeout of the HACO's Section 9 public housing program and termination of its Section 9 ACC.

Section 22 Streamline Voluntary Conversion

Under Section 22 Streamline Voluntary Conversion, if the Housing Authority has 250 or fewer public housing units on its ACC, the Housing Authority could be issued Tenant Based Vouchers (TBV) for up to 100% of the units and convert those vouchers into PBVs. However, the Voluntary Conversion option requires the residents to voluntarily convert their Tenant Based Voucher rights to have the PBV assistance and willingly give up their ability to receive a tenant-based voucher that could be used at the property or off-site in the private market.

The voluntary conversion stipulation of this approach makes it difficult to underwrite financing because it involves variables the Housing Authority does not control or cannot predict. We would typically estimate that only 50% to 80% of the residents would voluntarily convert their TBV to a PBV. Since this percentage will result in the same number of PBVs or fewer than the RAD/Section 18 Construction Blend, CVR did not utilize this approach in our financial analysis.

Section 32 Homeownership Program

This option allows a PHA to sell Public Housing units to low-income households, based on a PHA-adopted, and HUD-approved Homeownership Plan. It is an alternative disposition program to allow for affordable homeownership. Section 32 offers PHAs a flexible way to sell Public Housing units to low-income families, with preference given to current residents of the unit(s) being sold. The basic program requirements are that the purchasers must be low-income (80% below AMI) and have received HUD approved homeownership training, and that all units are at a standard that meets local code or if there is no code, meet Housing Quality Standards (HQS). Any other requirements and program eligibility are largely determined by the local PHA. Any sale proceeds generated must be used for Public Housing, Section 8 or other low-income housing needs, which could include buying and selling more units under the approved Section 32 homeownership plan. Also, the PHA may request Section 8 TPVs to protect HUD-assisted families and for all vacant units in the project that were occupied by an assisted family in the 24 months prior to Section 32 approval.

Although Section 32 is a path to Section 8 TPVs, it is not a path to project-base the current Public Housing units because the units have been sold to low-income families for homeownership. However, when a PHA receives the TPVs following a Section 32 action, the PHA may be able to project-base other units using the TPVs under certain conditions, such as when TPVs were



awarded for vacant units. A PHA is eligible for ARF but not DDTF under Section 32; however, a PHA does still retain its Faircloth Authority.

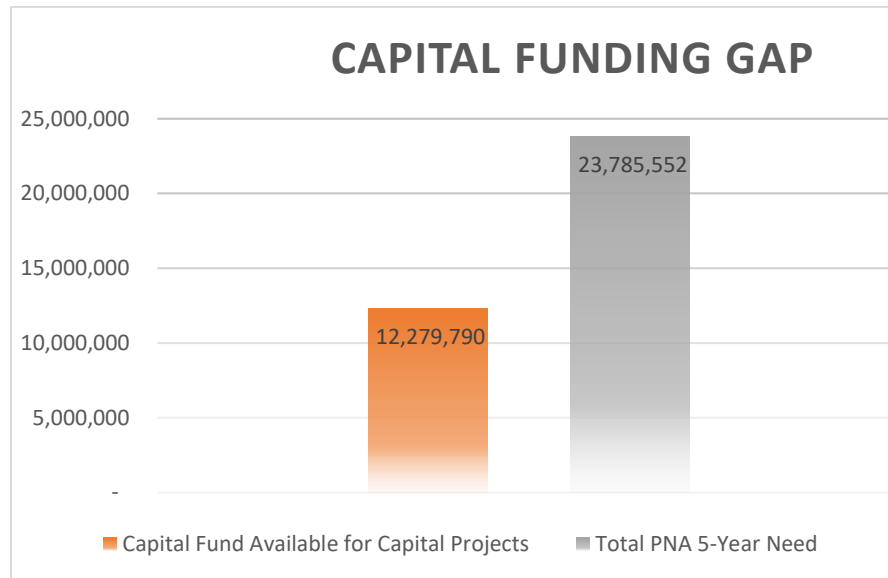
Due to the complexity of implementing this program, the extended amount of time it would take, and the fact that HACO units are not very conducive to conversion to homeownership, we have not included this approach in our financial analysis.

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Section 5: Recapitalization Options

Typically, HUD capital funding does not keep pace with the capital needs of the Housing Authority's properties. Oxnard is no different.

As previously mentioned, the Ameresco report identified **\$23.8M** in capital needs for HACO properties in the next 5 years, not including planned 504 conversions. However, HACO is only projected to receive **\$12.2M** in capital funds to address those needs over the next 5 years.



The recapitalization process allows Housing Authorities to use third-party sources to complete necessary physical improvements to a Public Housing property, often by leveraging the Section 8 rental assistance. Two of the most likely outside sources that are available to HACO include:

- Debt Only
- Low-Income Housing Tax Credits

Debt Only

A project's supportable debt is based, in large part, on its Net Operating Income (NOI), (Revenue – Operating Expenses). As discussed above in the Repositioning section, rents for Non-RAD PBVs in Oxnard are significantly higher than the current HUD RAD contract rents; therefore, utilizing repositioning options that maximize Non-RAD PBVs would generate higher operating income and more supportable debt.

There are several advantages to using debt over the low-income housing tax credit options, including:

- Less complicated transaction results in faster closing

- Less complicated transaction also results in lower transaction costs
- Less likely to require a Developer
- Property management does not need LIHTC experience
- No over-income issues with LIHTC income limits

Based on our financial analysis, the Debt only financing approach would provide sufficient funding to support the needed renovations for all HACO properties except the 102-unit Pleasant Valley property. Pleasant Valley will require Low-Income Housing Tax Credits to supplement their debt and complete renovations needed.

Low-Income Housing Tax Credits

There are two types of Low-Income Housing Tax Credits – 4% credits and 9% credits. The 4% credits are available “as of right” with tax-exempt bonds; the latter are awarded on a competitive basis by each state’s tax credit agency. The 4% credits have generally allowed PHAs to undertake a higher level of rehab than could be supported by debt. The 9% credit transactions have mostly involved new construction or substantial rehabilitation.

As mentioned above, the only HACO property that would need to combine LIHTCs with debt is Pleasant Valley. Based on our financial analysis, 4% tax credits would provide sufficient equity funding for Pleasant Valley and would also be easier to obtain than the competitive 9% LIHTCs.

Section 6: Recommended Approaches

Property	Approach	Debt?	Equity	Total Uses	Total Sources	Projected Gap
Cuesta Del Mar	RAD / Section 18 Construction Blend	Y	N	2,445,309	2,026,127	(419,181)
Hill Street	RAD / Section 18 Construction Blend	Y	N	4,002,683	2,886,147	(1,116,536)
Concord Drive	RAD / Section 18 Construction Blend	Y	N	4,440,434	3,718,048	(722,386)
Althea Court	RAD / Section 18 Construction Blend	Y	N	5,162,012	3,876,866	(1,285,146)
Fremont Square	RAD / Section 18 Construction Blend	Y	N	2,423,222	1,938,066	(485,155)
Felicia Court	RAD / Section 18 Construction Blend	Y	N	18,256,447	16,579,060	(1,677,386)
Pleasant Valley Village	RAD / Section 18 Construction Blend	Y	Y	47,879,865	47,879,865	0
Colonia Road	RAD / Section 18 Small PHA	Y	N	19,539,252	19,539,252	0
Palm Vista Sr. Apt	RAD / Section 18 Small PHA	Y	N	19,310,573	14,682,792	(4,627,781)
Plaza Vista Sr. Apt	RAD / Section 18 Small PHA	Y	N	10,069,784	6,380,402	(3,689,382)
Fashion Park Place	RAD / Section 18 Small PHA	Y	N	5,116,988	5,116,988	0
Total				138,717,097	125,113,324	(13,603,773)

Section 7: Implementation and Phasing Strategy

Utilizing current and projected Capital Funds, anticipated Section 18 DDTF, and operating reserves and private debt made available through a RAD conversion the Housing Authority will have sufficient revenue to address the capital needs of their portfolio include new construction at Althea Court. A summary of the projected sources and uses for implementing the Repositioning Strategy over the next five years is outlined in the following table.

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CAPITAL SOURCES:	2022	2023	2024	2025	2026	Totals
Annual CFP Funding	\$2,065,145	\$883,771	\$550,863	\$111,724	\$0	\$3,611,503
Unobligated Prior Year Funding	\$5,583,226					\$5,583,226
Operating Reserve / Excess Cash	\$3,242,782	\$1,630,593	\$2,103,080	\$1,365,463		\$8,341,918
Althea Insurance Proceeds	\$1,615,259					
DDTF	\$0	\$858,149	\$996,104	\$1,242,059	\$0	\$3,096,313
TOTAL SOURCES	12,506,412	3,372,514	3,650,047	2,719,246	0	22,248,219
NON-REPOSITIONING USES:	2022	2023	2024	2025	2026	Totals
Operations, Admin, Other	\$516,286.25	\$435,480.13	\$386,741.83	\$338,445.80	\$0.00	\$1,676,954
(% of CFP/DDTF)	25%	25%	25%	25%	25%	
Bond Service	\$440,790	\$440,790	\$440,790			\$1,322,370
New Construction / Office Building				\$2,500,000	\$3,357,037	\$5,857,037
REAC / Health & Safety Critical repairs	\$500,000	\$400,000	\$300,000	\$0		\$1,200,000
REPOSITIONING USES	2022	2023	2024	2025	2026	Totals
PBV Only Comprehensive Rehab	\$0	\$0	\$0	\$0	\$0	\$0
Site Name						
# of Units	0	0	0	0	0	0
RAD/PBV Small PHA	\$0	\$0	\$3,689,382	\$2,796,685	\$0	\$6,486,067
Site Name			Plaza Vista Sr. Colonia Road	Palm Vista / Fashion Park Place		
# of Units	0	0	151	100	0	251
RAD/PBV Conversion	\$5,705,791	\$0	\$0	\$0	\$0	\$5,705,791
Site Name	Felicia Court / Oxnard Townhomes	Pleasant Valley Village				
# of Units	178	102	0	0	0	280
TOTAL USES	7,162,867	1,276,270	4,816,914	5,635,131	3,357,037	22,248,219

*Please note that CVR is does not anticipate receiving any DDTF past 2025 due to using those funds to increase the RAD rents for Palm Vista.

Phase I

Next, The Housing Authority should submit a RAD applications for **Cuesta Del Mar**, **Hill Street**, **Concord Drive**, **Althea Court**, **Fremont Square**, **Felicia Court**, and **Pleasant Valley** with the intention of redeveloping these properties under the RAD / Section 18 Construction Blend approach

utilizing only debt for the financing for each property except Pleasant Valley, which will require both debt and equity.

This approach would result in a projected total development budget gap for the Debt Only properties of approximately **\$5.7M** and would only require an LIHTC equity partner for Pleasant Valley. Since this approach converts under the RAD program, the Housing Authority would be allowed to use Capital Funds and any Operating Reserves to fill the gap.

Phase II

Once the Phase I properties are converted and removed from PIC, the Housing Authority would be under the 250 unit threshold and would be eligible to reposition utilizing RAD / Section 18 Small PHA, however converting under this option would require the Housing Authority to close out its Section 9 Public Housing program. This would prevent HACO from developing additional affordable housing under HUD Faircloth to RAD program but would generate more operating revenue. If HACO has a desire to develop new units utilizing their Faircloth availability, HACO should convert the units remaining units under a RAD / Section 18 Construction Blend.

Based on the financial advantages, HACO should convert **Fashion Park Place, Colonia Road, Palm Vista, and Plaza Vista** under the RAD / Section 18 Small PHA. This approach would result in a projected total development budget gap of approximately **\$6.5M** and would use Debt only to finance the developments. Since this approach converts under RAD, the Housing Authority would be allowed to use Capital Funds and any Operating Reserves to fill the gap.

Phase III

Faircloth-to-RAD

After the repositioning of the current public portfolio is complete, the Housing Authority would have sufficient Developer fees, non-federal funding, and cash to consider new construction.

If the Housing Authority decides to convert the final 250 units under a RAD / Section 18 Construction Blend, they could use HUD's Faircloth-to-RAD, process to develop new units. Through this process, HACO can develop public housing units using HUD's public housing mixed-finance program with pre-approval to convert the property to a long-term Section 8 contract following construction. With early-stage RAD conversion approvals, lenders and investors will have revenue certainty through familiar Section 9 contracts to underwrite the construction of the development.

HUD has streamlined the mixed-finance development and RAD conversion processes to eliminate duplicative steps and predictability.

The Housing Authority would need to identify the site construction and begin predevelopment for new construction including Environmental Review and Site and Neighborhood standards.

As of September 30, 2021, HACO has 114 units in their Faircloth availability. The Housing Authority would be able to convert up to 114 units to RAD as part of a mixed-finance development. In addition to RAD units, the Housing Authority can put PBVs on 25 percent of units in the new development. Since, the properties would have RAD/Public Housing units HACO would be able to utilize Capital Funds, DDTF, and Operating Reserve as part of the Development budget.

HOTMA

The Housing Authority should consider sites that formerly had public housing to take advantage of the replacement units provision found in the HOTMA guidance. PIH Notice 2017-21 HOTMA guidance, states that certain units do not count towards the PBV percentage limitation and are exempt from the income-mixing requirement when PBV assistance is attached to them.

New construction units developed under the PBV program may be excluded from the limitation, provided the unit qualifies as a replacement unit. The unit must meet all the following requirements to meet this exception to the limitation:

1. The unit that the PBV newly constructed unit is replacing (i.e., the original unit) must have received one of the forms of HUD assistance or must have been subject to a rent restriction because of one of the HUD loan or insurance programs listed above no more than 5 years from the date the PHA either issued the RFP for PBV assistance or awarded the PBV pursuant to a prior competition for other governmental funds.
2. The newly constructed unit is located on the same site as the unit being replacing.
3. One of the primary purposes of the planned development of the PBV new construction project is or was to replace the affordable rental units that previously existed at the site.

HACO could take advantage of these HOTMA provisions to rebuild new units at the former Colonia Road site. The increased revenue generated by the PBVs, and not being limited to 25% of the new units being PBV, would allow HACO to support a large amount of debt.

Section 8: Next steps

Once HACO has reviewed and finalized this Repositioning Plan, the following details the initial steps recommended for moving the repositioning activities forward.

- Provide a presentation to the Board of Commissioners to obtain concurrence with the concepts and approach.
- Update the PHA Plan to incorporate the planned repositioning activities.
- Conduct resident meetings to begin to explain the repositioning plans. It's important to emphasize that these are just preliminary plans and any implementation activities will be at least one year away.
- Procure firms to:
 - i. Conduct a RAD Capital Needs Assessment;
 - ii. Conduct an Environmental Review;
 - iii. Prepare construction design documents; and
 - iv. Assist with programmatic requirements of the repositioning activities.

Appendix

Private Market Loans

Rents. The cash flow is determined by the operating income minus the expenses. The operating income is primarily determined by the level of rents. For the four different Repositioning options, the rents are set by the published 2020 RAD rents, current Tenant Based Voucher Payment Standard, and Project-Based Vouchers at 110% of the 2022 Ventura County FMR. However, a rent reasonableness study would be needed to determine the actual rent amount.

Expenses. Estimated operating expenses based on a 3-year average of the 2018 – 2020 Financial Data Schedule, were used to determine: the amount of debt the properties could support, the Net Operating Income, and the 20-year cash flow.

Loan Terms. Based on higher PBV rents, Oxnard would be able to support private debt and complete the necessary level of physical improvements needed to ensure a quality, safe, and marketable unit. Debt is not allowed if the units remain ACC, and RAD only rents may not support debt over a 20-year period. The amount of debt that could be put on the properties is determined by the terms of the loan and the cash flow of the properties. For this analysis, we assumed the same loan terms for each conversion option:

Interest – 5%

Loan term – 30 years

Debt Service Coverage ratio – 120%

LIHTC Equity. The Low-Income Housing Tax Credit program is the federal government's primary policy tool for encouraging development and rehabilitation of affordable rental housing. Developers are awarded federal tax credits, which are sold to investors, to finance the initial construction cost in exchange for agreeing to reserve a certain fraction of units that are rent-restricted and for lower-income households. This program couples well with Public Housing units and PHAs looking to reposition and recapitalize since their units are currently rent restricted and for lower-income households.

While the LIHTC program is a federal program, the tax credits are administered by state Housing Finance Agencies (HFAs) that award the tax credits to developers through a competitive process. The HFAs will publish a Qualified Allocation Plan (QAP) to describe how tax credits will be awarded, the process for applying for tax credits, and what is included in the application.

There are two types of LIHTCs available to developers; 9% credits which are limited, awarded on a competitive basis, and are generally used for new construction or sustainable rehabilitation, and 4% tax credit which are generally unlimited and are commonly used for acquisition and rehabilitation. 4% tax credits must be used in combination with federally tax-exempt bonds financing.

For this analysis, we used the following assumptions and information:

- Developer Fee is set at 15% based on the QAP;
- All scenarios are based on a 4% tax credit award and \$.90 per \$1 in the credits; and
- All sites, except Concord Dr, is in a Qualified Census Tract (QCT) or Difficult Development Area (DDA).

Capital Fund Financing Program (CFFP)

Under a CFFP, a PHA borrows private capital to finance public housing development or modernization activities using a portion of its CFP grant for debt services payments and usual and customary financing costs on the debt. With HUD's prior written approval, a PHA secures such payments by granting to the lender a security interest in its future annual Capital Funds grants. HACO currently has a CFFP loan that was used to renovate a number of properties in the past.

Resident Notification Requirements

RAD

Prior to applying to participate in the Rental Assistance Demonstration, the PHA must:

1. Provide written notification to legitimate resident organizations of the PHA's intent to pursue a conversion;
2. Provide written notification in the form of a RAD Information Notice (RIN) to residents of projects proposed for conversion to inform the residents of the PHA's intent to pursue a conversion and of their rights in connection with a proposed conversion (whether any relocation is anticipated). A General Information Notice (GIN) must also be issued if it is required by the Uniform Relocation Assistance and Real Property Acquisition Act (URA). The URA regulations at 49 CFR part 24 and relevant program regulations specify the time by which a GIN must be issued, which may be different than the timing for issuance of the RIN. URA and program regulations also specify the entity responsible for issuing GINs. See the RAD Fair Housing, Civil Rights, and Relocation Notice for additional detail regarding the timing, content and purpose of these resident notifications;
3. Following issuance of the RIN, conduct at least two meetings with residents of projects proposed for conversion to discuss conversion plans and provide opportunity for comment, which discussion must include a description of resident rights and a description of the PHAs preliminary intentions, to the extent formulated, with respect to:
 - a) whether the conversion will include a transfer of assistance and potential locations to which the assistance would be transferred,

b) plans to partner with an entity other than an affiliate or instrumentality of the PHA if such partner will have a general partner or managing member ownership interest in the proposed Project Owner,

c) change in the number or configuration of assisted units or any other change that may impact a household's ability to re-occupy the property following repairs or construction,

d) de minimis reduction of units which had been vacant for more than 24 months at the time of RAD Application, and

e) the scope of work; and

4. Prepare comprehensive written responses to comments received in connection with the required resident meeting on the proposed conversion to be submitted with the RAD Application.

After a PHA is selected to participate in the Demonstration (i.e., receipt of CHAP) but prior to requesting a Concept Call, the PHA must have at least one meeting with residents to discuss updated conversion plans covering, at a minimum, the topics listed above, and to solicit feedback on proposed property improvements, if appropriate. Additional resident meetings may be required if the PHA requests extension to the submission of the Financing Plan.

Following a successful Concept Call and invitation to submit a Financing Plan, the PHA must have at least one more meeting with residents prior to submission of the Financing Plan to discuss updated conversion plans covering, at a minimum, the topics listed above, and the anticipated Financing Plan submission.

Upon issuance of the RAD Conversion Commitment (RCC), the PHA must also notify residents that conversion of the project has been approved, and address, as appropriate, anticipated timing of the conversion, the anticipated duration of the work, the revised terms of the lease and house rules, any anticipated relocation, and opportunities and procedures for the exercise of the choice-mobility option. Households in the affected project(s) who do not want to transition to the Section 8 program may, be offered, if available, the opportunity to move to other public housing owned by the PHA. The following notices will need to be distributed:

1. Notice of Eligibility;
2. RAD Relocation Notice;
3. Notice of Non-Displacement; and
4. Right to Return (if applicable).

Additional meetings with residents are required to discuss any substantial change to the conversion plans relative to what was presented in the previous resident meetings.

PHAs must provide residents with notification of public housing lease termination in accordance with 24 CFR § 966.4(l)(3) and local law and shall enter into new Section 8 leases effective as of the effective date of the HAP Contract. Additionally, if residents are required to move,

residents must be issued a 90-day notice (if applicable) and a 30-day notice to vacate to be temporarily or permanently rehoused.

Section 18

Meetings with residents of projects proposed for conversion are needed to discuss plans and provide an opportunity for comment, in which the discussion must include a description of resident rights and a description of the PHAs preliminary intentions, to the extent formulated.

Section 18 includes relocation provisions for residents of covered projects that are similar to, but not identical to, the URA. Under Section 18, the only required notice is the 90 day notice to vacate. The General Information Notice and Notice of Eligibility or Non-Displacement are not required, but are recommended.

Section 22

For purposes of a voluntary conversion, written notice shall constitute the General Information Notice (GIN).

The written notice shall include all the following:

1. The development will no longer be used as public housing and that the family may be displaced as a result of the conversion;
2. The family will be offered comparable housing, which may include tenant-based or project-based assistance, or occupancy in a unit operated or assisted by the PHA (if tenant-based assistance is used, the comparable housing requirement is fulfilled only upon relocation of the family into such housing);
3. Any necessary counseling with respect to the relocation will be provided, including any appropriate mobility counseling (the PHA may finance the mobility counseling using Operating Fund, Capital Fund, or Section 8 administrative fee funding);
4. The family may be relocated to other decent, safe, sanitary, and affordable housing that is, to the maximum extent possible, housing of their choice;
5. If the development is used as housing after conversion, the PHA must ensure that each resident may choose to remain in the housing, using tenant-based assistance towards rent;
6. Where Section 8 voucher assistance is being used for relocation, the family will be provided with the vouchers at least 90 days before displacement;
7. Additional information required for conversions subject to the URA. If the voluntary conversion is subject to the URA, the written notice described in paragraph (g)(4) of the URA must also provide that:
 - a. The family will not be required to move without at least 90-days advance written notice of the earliest date by which the family may be required to move, and that the family will not be required to move permanently until the family is offered comparable housing as provided in paragraph (g)(4)(ii)(B) of the URA;

- b. Any person who is an alien not lawfully present in the United States is ineligible for relocation payments or assistance under the URA, unless such ineligibility would result in exceptional and extremely unusual hardship to a qualifying spouse, parent, or child, as provided in the URA regulations at 49 CFR 24.208.
- c. The family has a right to appeal the PHA's determination as to the family's application for relocation assistance for which the family may be eligible.
- d. Families residing in the development will be provided with the URA Notice of Relocation Eligibility or Notice of Non-displacement (as applicable) as of the date HUD approves the conversion.

To convert TBVs to PBVs under Section 22 Streamlined Voluntary Conversion, residents would have to voluntarily consent to the PBV assistance and willingly give up their tenant-based voucher. Written Consent – The family must be given at least 30 days from the date of the family briefing to make their decision. The consent form provided to each family at the briefing must explicitly acknowledge a family's consent or non-consent. The consent form must indicate that it must be signed by the head of household and include the name and telephone number of a PHA employee that families can contact directly if they should have any questions or need additional information. If a family does not respond, informs the PHA that they wish to retain HCV assistance, or affirmatively withholds consent, the PHA shall not include that unit under a PBV HAP contract.

EXHIBIT A

Repositioning Options: Summary of Key Characteristics (3-2021)

This chart compares the key program characteristics of each main repositioning option, from eligibility for TPVs to impact on Faircloth

Program	Eligible for TPVs?	Eligible for DDTF?	Eligible for ARF?	Resident Right to Return?	Replacement Housing Required?	Disposition Required?	Use of Sales Proceeds	Use of PH Program Funds	Tenant Consent to PBV?	Removal of all units and Closeout required? ^{2,1}	Reduces Faircloth?
RAD	No	No	No	Yes	Yes	No	Affordable housing purposes per RAD Notice ²	Yes	No	No	Yes
Streamlined RAD (50 or Fewer Units)	No	No	No	Yes	Yes	No	Affordable housing per RAD Notice	Yes	No	Yes	Yes
Section 18 Disposition – • Obsolescence • Health and Safety • Scattered Sites • Infeasible Operation	Yes	Yes	Yes	No	No	Yes	Low-income housing ³	No	No	No	No
Section 18 Disposition – • 50 or Fewer Units	Yes	Yes	Yes	No	No	Yes	See footnote 3	No	No	Yes	No
Section 18 Disposition – • Efficient and Effective	Partial	Yes	Yes	No	No	Yes	See footnote 3	No	No	No	No
Section 18 Disposition – • RAD/Section 18 Blends ⁴	Yes	Yes	Yes ⁵	Yes	Yes	Yes ⁶	Affordable housing purposes per RAD Notice ⁷	Yes	No	No ⁸	No ⁹
Voluntary Conversion	Yes	No	No	No ¹⁰	No	No ¹¹	See footnote 3	No	Yes	No	No
Streamlined Voluntary Conversion (250 or Less Units)	Yes	No	No	No	No	No	See footnote 3	No	Yes	Yes	No
Required Conversion	Yes	No	No	No	No	No	See footnote 3	No	N/A ¹²	No	No
Section 32 Homeownership	Yes	No	Yes	No	No	Yes	Purposes related to low-income housing. Similar to footnote 3	No	N/A	No	No

¹ Close-out refers to the requirement for a PHA to end their public housing program through ACC termination, transfer or consolidation. See PIH Notice 2019-13

² Affordable Housing Purposes means activity that supports the pre-development, development or rehabilitation of other RAD conversions, public housing, section 8 of the Act, Low-Income Housing Tax Credits (LIHTC), or other federal or local housing programs serving households with incomes at or below 80% of area median income, or that provide services or amenities that will be used primarily by low-income households as defined by the 1937 Act.

A PHA is prohibited from receiving excess sales proceeds if public housing funds are part of the development budget, except when it is the PHA's last remaining units.

³ For the provision of low-income housing (as defined by the 1937 Act) or to benefit the public housing residents of the PHA; or leveraging amounts for securing commercial enterprises, on-site in public housing projects of the PHA, appropriate to serve the needs of the public housing residents. This statutory prescribed use of proceeds is narrower than Affordable Housing Purposes, as defined by the RAD Notice, which generally allows proceeds to be used for housing and related services that serve families at or below 80% of AMI.

⁴ These provisions apply to RAD/Section 18 Construction and Small PHA Blends described in PIH Notice 2021-07. These provisions only apply to the Section 18 (not RAD) units.

⁵ PHAs are eligible for ARF for units with Section 18 approval for an entire project or entire building in a project (as project is defined in 24 CFR part 990 and by public housing not by RAD). If some units in a building are being converted under RAD, the PHA is not eligible for ARF for the units in that building approved under Section 18 because 990.190(h) requires an entire building to be disposed under Section 18.

⁶ HUD releases the DOT and approves the real estate transaction (including disposition) for the Section 18 units in a blend pursuant to the RAD requirements.

⁷ HUD releases the DOT and approves the real estate transaction (including proceeds) for the Section 18 units in a blend pursuant to the RAD requirements.

⁸ For the Small PHA blend, PHA must have a HUD-approved repositioning plan that removes all of a PHA's public housing units, but units do not need to be removed in the blend application

⁹ For the Small PHA blend, PHA's repositioning plan must reflect that it will not develop new public housing units under Faircloth

¹⁰ PHAs can "voucher-out" families using tenant-based assistance. No hard unit replacement is required. However, if the project is used as rental housing after conversion, the PHA must ensure that each resident may choose to remain in the housing, using tenant-based assistance towards rent.

¹¹ Section 22 does not require a disposition—a PHA may retain the property after a conversion. However, if the PHA plans to use the project as rental housing after conversion, since families have the right to remain in the unit using tenant-based assistance, and the PHA can't sign two sides of the Section 8 contract, it may need to dispose to another entity (including one it wholly controls) or otherwise ensure compliance with Section 8 HAP separate entity requirements.

¹² If the project is used as rental housing after conversion, the PHA must ensure that each resident may choose to remain in the housing, using tenant-based assistance towards rent. However, the units cannot be project-based. See PIH Notice 2019-10.

EXHIBIT B

Approach	Althea Court PBV With Equity No Debt Comp Rehab	Althea Court PBV With Equity With Debt Comp Rehab	Althea Court PBV No Equity With Debt Comp Rehab	Althea Court RAD / Section 18 With Equity No Debt Comp Rehab	Althea Court RAD / Section 18 With Equity With Debt Comp Rehab	Althea Court RAD / Section 18 No Equity With Debt Comp Rehab	Althea Court RAD S18 Small PHA With Equity No Debt Comp Rehab	Althea Court RAD S18 Small PHA With Equity With Debt Comp Rehab	Althea Court RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	20	20	20	20	20	20	20	20	20
Gross Residential Revenue:	798,264	798,264	798,264	423,768	423,768	545,784	723,960	723,960	723,960
Less Vacancy and Bad Debt:	(39,913)	(39,913)	(39,913)	(21,188)	(21,188)	(27,289)	(36,198)	(36,198)	(36,198)
Effective Residential Income:	758,351	758,351	758,351	402,580	402,580	518,495	687,762	687,762	687,762
Other Income:	2,400	2,400	2,400	2,400	2,400	2,400	2,400	2,400	2,400
Gross Effective Income:	760,751	760,751	760,751	404,980	404,980	520,895	690,162	690,162	690,162
Less Residential OpEx	(211,260)	(211,260)	(211,260)	(211,260)	(211,260)	(211,260)	(211,260)	(211,260)	(211,260)
Replacement Reserves	(7,000)	(7,000)	(7,000)	(7,000)	(7,000)	(7,000)	(7,000)	(7,000)	(7,000)
Net Operating Income	542,491	542,491	542,491	186,720	186,720	302,635	471,902	471,902	471,902
Less Debt Service	0	(452,076)	(452,076)	0	(155,600)	(252,196)	0	(393,252)	(393,252)
Cash Flow	542,491	90,415	90,415	186,720	31,120	50,439	471,902	78,650	78,650
Uses									
Construction Cost	1,186,941	1,186,941	1,186,941	1,186,941	1,186,941	2,786,941	1,186,941	1,186,941	1,186,941
General Conditions/Overhead/ Profit	166,172	166,172	166,172	166,172	166,172	390,172	166,172	166,172	166,172
Hard Cost contingency	135,311	135,311	135,311	135,311	135,311	317,711	135,311	135,311	135,311
Acquisition	9,100,000	9,100,000	0	3,200,000	3,200,000	0	7,900,000	7,900,000	0
Relocation	70,000	70,000	70,000	70,000	70,000	70,000	70,000	70,000	70,000
Soft Costs(not including acquisition and developer fee)	372,106	372,106	223,264	372,106	372,106	524,224	372,106	372,106	223,264
Soft Cost Contingency	18,605	18,605	11,163	18,605	18,605	26,211	18,605	18,605	11,163
Developer Fee	736,870	736,870	179,285	441,870	441,870	411,526	676,870	676,870	179,285
Replacement Reserve	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000	400,000
Reserves	109,130	335,168	335,168	109,130	186,930	235,228	109,130	305,756	305,756
Total Uses	12,295,135	12,521,173	2,707,303	6,100,135	6,177,935	5,162,012	11,035,135	11,231,761	2,677,891
Sources									
Private Loan	0	6,949,511	6,949,511	0	2,391,948	3,876,866	0	6,045,242	6,045,242
LIHTC Equity	4,468,605	4,468,605	0	2,206,771	2,206,771	0	4,008,571	4,008,571	0
Seller Take Back Financing	9,100,000	9,100,000	0	3,200,000	3,200,000	0	7,900,000	7,900,000	0
Total Sources	13,568,605	20,518,116	6,949,511	5,406,771	7,798,719	3,876,866	11,908,571	17,953,813	6,045,242
(Gap)/Surplus	\$1,273,470	\$7,996,943	\$4,242,208	(1493,364)	\$1,620,785	(11,295,146)	\$873,436	\$6,722,052	\$3,367,351
Operating Pro formas									
Year 1	542,491	90,415	90,415	186,720	31,120	50,439	471,902	78,650	78,650
Year 2	551,263	99,187	99,187	188,376	32,777	54,414	479,262	86,011	86,011
Year 5	578,257	126,181	126,181	193,158	37,559	66,433	501,849	108,597	108,597
Year 19	717,732	265,656	265,656	209,603	54,004	122,963	616,914	223,662	223,662
Year 20	728,536	276,460	276,460	210,244	54,645	126,915	625,701	232,450	232,450
Total	12,645,743	3,604,229	3,604,229	4,001,438	889,445	1,773,959	10,930,620	3,065,587	3,065,587

Approach	Felicia Court PBV With Equity No Debt Comp Rehab	Felicia Court PBV With Equity With Debt Comp Rehab	Felicia Court PBV No Equity With Debt Comp Rehab	Felicia Court RAD / Section 18 With Equity No Debt Comp Rehab	Felicia Court RAD / Section 18 With Equity With Debt Comp Rehab	Felicia Court RAD / Section 18 No Equity With Debt Comp Rehab	Felicia Court RAD S18 Small PHA With Equity No Debt Comp Rehab	Felicia Court RAD S18 Small PHA With Equity With Debt Comp Rehab	Felicia Court RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	100	100	100	100	100	100	100	100	100
Gross Residential Revenue:	3,425,592	3,425,592	3,425,592	2,260,200	2,260,200	2,260,200	3,112,152	3,112,152	3,112,152
Less Vacancy and Bad Debt:	(171,280)	(171,280)	(171,280)	(113,010)	(113,010)	(113,010)	(155,608)	(155,608)	(155,608)
Effective Residential Income:	3,254,312	3,254,312	3,254,312	2,147,190	2,147,190	2,147,190	2,956,544	2,956,544	2,956,544
Other Income:	12,000	12,000	12,000	12,000	12,000	12,000	12,000	12,000	12,000
Gross Effective Income:	3,266,312	3,266,312	3,266,312	2,159,190	2,159,190	2,159,190	2,968,544	2,968,544	2,968,544
Less Residential OpEx	(830,000)	(830,000)	(830,000)	(830,000)	(830,000)	(830,000)	(830,000)	(830,000)	(830,000)
Replacement Reserves	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)
Net Operating Income	2,401,312	2,401,312	2,401,312	1,294,190	1,294,190	1,294,190	2,103,544	2,103,544	2,103,544
Less Debt Service	0	(2,001,094)	(2,001,094)	0	(1,078,492)	(1,078,492)	0	(1,752,954)	(1,752,954)
Cash Flow	2,401,312	400,219	400,219	1,294,190	215,698	215,698	2,103,544	350,591	350,591
Uses									
Construction Cost	9,770,236	9,770,236	9,770,236	9,770,236	9,770,236	9,770,236	9,770,236	9,770,236	9,770,236
General Conditions/Overhead/ Profit	1,367,833	1,367,833	1,367,833	1,367,833	1,367,833	1,367,833	1,367,833	1,367,833	1,367,833
Hard Cost contingency	1,113,807	1,113,807	1,113,807	1,113,807	1,113,807	1,113,807	1,113,807	1,113,807	1,113,807
Acquisition	40,100,000	40,100,000	0	21,600,000	21,600,000	0	35,100,000	35,100,000	0
Relocation	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000
Soft Costs(not including acquisition and developer fee)	3,062,969	3,062,969	1,837,781	3,062,969	3,062,969	1,837,781	3,062,969	3,062,969	1,837,781
Soft Cost Contingency	153,148	153,148	91,889	153,148	153,148	91,889	153,148	153,148	91,889
Developer Fee	4,371,998	4,371,998	1,453,155	3,400,199	3,400,199	1,453,155	4,075,199	4,075,199	1,453,155
Replacement Reserve	1,300,000	1,300,000	1,300,000	1,300,000	1,300,000	1,300,000	1,300,000	1,300,000	1,300,000
Reserves	432,500	1,433,047	1,433,047	432,500	971,746	971,746	432,500	1,308,977	1,308,977
Total Uses	62,022,492	63,023,038	18,717,748	42,550,692	43,089,938	18,256,447	56,725,692	57,602,169	18,593,678
Sources									
Private Loan	0	30,761,714	30,761,714	0	16,579,060	16,579,060	0	26,947,194	26,947,194
Deferred fees	1,871,998	1,871,998	0	900,199	900,199	0	1,575,199	1,575,199	0
LIHTC Equity	22,419,874	22,419,874	0	16,241,690	16,241,690	0	21,417,072	21,417,072	0
Seller Take Back Financing	40,100,000	40,100,000	0	21,600,000	21,600,000	0	35,100,000	35,100,000	0
Total Sources	64,391,872	95,153,586	30,761,714	38,741,889	55,320,949	16,579,060	58,092,271	85,039,465	26,947,194
(Gap)/Surplus	\$2,369,381	\$32,130,548	\$12,043,967	(13,000,809)	\$12,231,011	(11,077,389)	\$1,366,579	\$27,437,296	\$8,353,517
Operating Pro formas									
Year 1	2,401,312	400,219	400,219	1,294,190	215,698	215,698	2,103,544	350,591	350,591
Year 2	2,441,214	440,120	440,120	1,311,949	233,457	233,457	2,137,490	384,537	384,537
Year 5	2,564,242	563,148	563,148	1,365,857	287,365	287,365	2,241,928	488,974	488,974
Year 19	3,206,322	1,205,228	1,205,228	1,625,079	546,587	546,587	2,781,036	1,028,082	1,028,082
Year 20	3,256,547	1,255,453	1,255,453	1,643,679	565,187	565,187	2,822,755	1,069,802	1,069,802
Total	56,251,061	16,229,188	16,229,188	29,350,899	7,781,065	7,781,065	49,016,082	13,957,009	13,957,009

Approach	Colonia Road PBV With Equity No Debt Comp Rehab	Colonia Road PBV With Equity With Debt Comp Rehab	Colonia Road PBV No Equity With Debt Comp Rehab	Colonia Road RAD / Section 18 With Equity No Debt Comp Rehab	Colonia Road RAD / Section 18 With Equity With Debt Comp Rehab	Colonia Road RAD / Section 18 No Equity With Debt Comp Rehab	Colonia Road RAD S18 Small PHA With Equity No Debt Comp Rehab	Colonia Road RAD S18 Small PHA With Equity With Debt Comp Rehab	Colonia Road RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	74	74	74	74	74	74	74	74	74
Gross Residential Revenue:	2,834,784	2,834,784	2,834,784	2,304,960	2,304,960	2,304,960	2,560,800	2,560,800	2,560,800
Less Vacancy and Bad Debt:	(141,739)	(141,739)	(141,739)	(115,248)	(115,248)	(115,248)	(128,040)	(128,040)	(128,040)
Effective Residential Income:	2,693,045	2,693,045	2,693,045	2,189,712	2,189,712	2,189,712	2,432,760	2,432,760	2,432,760
Other Income:	8,880	8,880	8,880	8,880	8,880	8,880	8,880	8,880	8,880
Gross Effective Income:	2,701,925	2,701,925	2,701,925	2,198,592	2,198,592	2,198,592	2,441,640	2,441,640	2,441,640
Less Residential OpEx	(768,120)	(768,120)	(768,120)	(768,120)	(768,120)	(768,120)	(768,120)	(768,120)	(768,120)
Replacement Reserves	(25,900)	(25,900)	(25,900)	(25,900)	(25,900)	(25,900)	(25,900)	(25,900)	(25,900)
Net Operating Income	1,907,905	1,907,905	1,907,905	1,404,572	1,404,572	1,404,572	1,647,620	1,647,620	1,647,620
Less Debt Service	0	(1,589,921)	(1,589,921)	0	(1,170,477)	(1,170,477)	0	(1,373,017)	(1,373,017)
Cash Flow	1,907,905	317,984	317,984	1,404,572	234,095	234,095	1,647,620	274,603	274,603
Uses									
Construction Cost	10,127,942	10,127,942	10,127,942	10,743,459	10,743,459	10,743,459	10,127,942	10,127,942	10,127,942
General Conditions/Overhead/ Profit	1,417,912	1,417,912	1,417,912	1,504,084	1,504,084	1,504,084	1,417,912	1,417,912	1,417,912
Hard Cost contingency	1,154,585	1,154,585	1,154,585	1,224,754	1,224,754	1,224,754	1,154,585	1,154,585	1,154,585
Acquisition	31,800,000	31,800,000	0	23,500,000	23,500,000	0	27,500,000	27,500,000	0
Relocation	259,000	259,000	259,000	259,000	259,000	259,000	259,000	259,000	259,000
Soft Costs(not including acquisition and developer fee)	3,175,110	3,175,110	1,905,066	3,368,074	3,368,074	2,020,845	3,175,110	3,175,110	1,905,066
Soft Cost Contingency	158,755	158,755	95,253	168,404	168,404	101,042	158,755	158,755	95,253
Developer Fee	3,995,146	3,995,146	1,495,976	3,726,316	3,726,316	1,585,318	3,780,146	3,780,146	1,495,976
Replacement Reserve	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000	2,000,000
Reserves	397,010	1,191,970	1,191,970	397,010	982,248	982,248	397,010	1,083,518	1,083,518
Total Uses	54,485,460	55,280,420	19,647,704	46,891,102	47,476,340	20,420,751	49,970,460	50,656,968	19,539,252
Sources									
Private Loan	0	24,440,978	24,440,978	0	17,993,095	17,993,095	0	21,106,631	21,106,631
Deferred fees	1,495,146	1,495,146	0	1,226,316	1,226,316	0	1,280,146	1,280,146	0
LIHTC Equity	20,394,868	20,394,868	0	17,704,189	17,704,189	0	18,746,413	18,746,413	0
Seller Take Back Financing	31,800,000	31,800,000	0	23,500,000	23,500,000	0	27,500,000	27,500,000	0
Total Sources	53,690,013	78,130,991	24,440,978	42,430,505	60,423,601	17,993,095	47,526,558	68,633,190	21,106,631
(Gap)/Surplus	(\$790,447)	\$22,850,571	\$4,793,273	(\$4,460,596)	\$12,947,261	(\$1,427,656)	(\$1,443,802)	\$17,976,221	\$1,567,379
Operating Pro formas									
Year 1	1,907,905	317,984	317,984	1,404,572	234,095	234,095	1,647,620	274,603	274,603
Year 2	1,938,511	348,591	348,591	1,425,112	254,635	254,635	1,673,021	300,004	300,004
Year 5	2,032,635	442,714	442,714	1,487,812	317,335	317,335	1,750,895	377,878	377,878
Year 19	2,517,481	927,560	927,560	1,798,598	628,121	628,121	2,145,730	772,713	772,713
Year 20	2,554,923	965,002	965,002	1,821,662	651,186	651,186	2,175,737	802,721	802,721
Total	44,411,091	12,612,678	12,612,678	32,181,428	8,771,894	8,771,894	38,086,855	10,626,522	10,626,522

Approach	Pleasant Valley Village PBV With Equity No Debt Comp Rehab	Pleasant Valley Village PBV With Equity With Debt Comp Rehab	Pleasant Valley Village PBV No Equity With Debt Comp Rehab	Pleasant Valley Village RAD / Section 18 With Equity No Debt Comp Rehab	Pleasant Valley Village RAD / Section 18 With Equity With Debt Comp Rehab	Pleasant Valley Village RAD / Section 18 No Equity With Debt Comp Rehab	Pleasant Valley Village RAD S18 Small PHA With Equity No Debt Comp Rehab	Pleasant Valley Village RAD S18 Small PHA With Equity With Debt Comp Rehab	Pleasant Valley Village RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	102	102	102	102	102	102	102	102	102
Gross Residential Revenue:	3,641,256	3,641,256	3,641,256	2,381,112	2,381,112	2,381,112	3,274,272	3,274,272	3,274,272
Less Vacancy and Bad Debt:	(182,063)	(182,063)	(182,063)	(119,056)	(119,056)	(119,056)	(163,714)	(163,714)	(163,714)
Effective Residential Income:	3,459,193	3,459,193	3,459,193	2,262,056	2,262,056	2,262,056	3,110,558	3,110,558	3,110,558
Other Income:	12,240	12,240	12,240	12,240	12,240	12,240	12,240	12,240	12,240
Gross Effective Income:	3,471,433	3,471,433	3,471,433	2,274,296	2,274,296	2,274,296	3,122,798	3,122,798	3,122,798
Less Residential OpEx	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)	(1,054,272)
Replacement Reserves	(35,700)	(35,700)	(35,700)	(35,700)	(35,700)	(35,700)	(35,700)	(35,700)	(35,700)
Net Operating Income	2,381,461	2,381,461	2,381,461	1,184,324	1,184,324	1,184,324	2,032,826	2,032,826	2,032,826
Less Debt Service	0	(1,984,551)	(1,984,551)	0	(986,937)	(986,937)	0	(1,694,022)	(1,694,022)
Cash Flow	2,381,461	396,910	396,910	1,184,324	197,387	197,387	2,032,826	338,804	338,804
Uses									
Construction Cost	11,915,742	11,915,742	11,915,742	11,915,742	11,915,742	11,915,742	11,915,742	11,915,742	11,915,742
General Conditions/Overhead/ Profit	1,668,204	1,668,204	1,668,204	1,668,204	1,668,204	1,668,204	1,668,204	1,668,204	1,668,204
Hard Cost contingency	1,358,395	1,358,395	1,358,395	1,358,395	1,358,395	1,358,395	1,358,395	1,358,395	1,358,395
Acquisition	39,700,000	39,700,000	0	19,800,000	19,800,000	0	33,900,000	33,900,000	0
Relocation	357,000	357,000	357,000	357,000	357,000	357,000	357,000	357,000	357,000
Soft Costs(not including acquisition and developer fee)	3,735,585	3,735,585	2,241,351	3,735,585	3,735,585	2,241,351	3,735,585	3,735,585	2,241,351
Soft Cost Contingency	186,779	186,779	112,068	186,779	186,779	112,068	186,779	186,779	112,068
Developer Fee	4,814,706	4,814,706	1,765,276	3,819,706	3,819,706	1,765,276	4,524,706	4,524,706	1,765,276
Replacement Reserve	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000	4,000,000
Reserves	544,986	1,537,262	1,537,262	544,986	1,038,455	1,038,455	544,986	1,391,997	1,391,997
Total Uses	68,281,397	69,273,672	24,955,297	47,386,397	47,879,865	24,456,490	62,191,397	63,038,408	24,810,032
Sources									
Private Loan	0	30,507,413	30,507,413	0	15,171,641	15,171,641	0	26,041,270	26,041,270
Deferred fees	2,274,706	2,274,706	54,364	1,279,706	1,279,706	54,364	1,984,706	1,984,706	54,364
LIHTC Equity	24,104,146	24,104,146	0	17,267,170	17,267,170	0	22,672,570	22,672,570	0
Seller Take Back Financing	39,700,000	39,700,000	0	19,800,000	19,800,000	0	33,900,000	33,900,000	0
Total Sources	66,078,852	96,586,265	30,561,777	38,346,876	53,518,517	15,226,005	58,557,275	84,598,546	26,095,634
(Gap)/Surplus	(12,202,545)	\$27,312,593	\$5,606,480	(12,039,521)	\$5,638,651	(10,230,485)	(14,634,122)	\$21,560,138	\$1,285,602
Operating Pro formas									
Year 1	2,381,461	396,910	396,910	1,184,324	197,387	197,387	2,032,826	338,804	338,804
Year 2	2,418,726	434,175	434,175	1,197,647	210,710	210,710	2,063,119	369,097	369,097
Year 5	2,533,108	548,557	548,557	1,237,288	250,351	250,351	2,155,734	461,712	461,712
Year 19	3,116,562	1,132,011	1,132,011	1,406,756	419,819	419,819	2,618,626	924,604	924,604
Year 20	3,161,178	1,176,627	1,176,627	1,417,176	430,239	430,239	2,653,283	959,261	959,261
Total	55,192,498	15,501,478	15,501,478	26,105,222	6,366,482	6,366,482	46,721,589	12,841,149	12,841,149

Approach	Plaza Vista Sr.Apt PBV With Equity No Debt Comp Rehab	Plaza Vista Sr.Apt PBV With Equity With Debt Comp Rehab	Plaza Vista Sr.Apt PBV No Equity With Debt Comp Rehab	Plaza Vista Sr.Apt RAD / Section 18 With Equity No Debt Comp Rehab	Plaza Vista Sr.Apt RAD / Section 18 With Equity With Debt Comp Rehab	Plaza Vista Sr.Apt RAD / Section 18 No Equity With Debt Comp Rehab	Plaza Vista Sr.Apt RAD S18 Small PHA With Equity No Debt Comp Rehab	Plaza Vista Sr.Apt RAD S18 Small PHA With Equity With Debt Comp Rehab	Plaza Vista Sr.Apt RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	50	50	50	50	50	50	50	50	50
Gross Residential Revenue:	1,114,776	1,114,776	1,114,776	883,080	883,080	883,080	1,001,016	1,001,016	1,001,016
Less Vacancy and Bad Debt:	(55,739)	(55,739)	(55,739)	(44,154)	(44,154)	(44,154)	(50,051)	(50,051)	(50,051)
Effective Residential Income:	1,059,037	1,059,037	1,059,037	838,926	838,926	838,926	950,965	950,965	950,965
Other Income:	6,000	6,000	6,000	6,000	6,000	6,000	6,000	6,000	6,000
Gross Effective Income:	1,065,037	1,065,037	1,065,037	844,926	844,926	844,926	956,965	956,965	956,965
Less Residential OpEx	(441,400)	(441,400)	(441,400)	(441,400)	(441,400)	(441,400)	(441,400)	(441,400)	(441,400)
Replacement Reserves	(17,500)	(17,500)	(17,500)	(17,500)	(17,500)	(17,500)	(17,500)	(17,500)	(17,500)
Net Operating Income	606,137	606,137	606,137	386,026	386,026	386,026	498,065	498,065	498,065
Less Debt Service	0	(505,114)	(505,114)	0	(321,688)	(321,688)	0	(415,054)	(415,054)
Cash Flow	606,137	101,023	101,023	386,026	64,338	64,338	498,065	83,011	83,011
Uses									
Construction Cost	4,816,510	4,816,510	4,816,510	4,816,510	4,816,510	4,816,510	4,816,510	4,816,510	4,816,510
General Conditions/Overhead/ Profit	674,311	674,311	674,311	674,311	674,311	674,311	674,311	674,311	674,311
Hard Cost contingency	549,082	549,082	549,082	549,082	549,082	549,082	549,082	549,082	549,082
Acquisition	10,200,000	10,200,000	0	6,500,000	6,500,000	0	8,400,000	8,400,000	0
Relocation	175,000	175,000	175,000	175,000	175,000	175,000	175,000	175,000	175,000
Soft Costs(not including acquisition and developer fee)	1,509,976	1,509,976	905,986	1,509,976	1,509,976	905,986	1,509,976	1,509,976	905,986
Soft Cost Contingency	75,499	75,499	45,299	75,499	75,499	45,299	75,499	75,499	45,299
Developer Fee	1,653,807	1,653,807	716,619	1,468,807	1,468,807	716,619	1,563,807	1,563,807	716,619
Replacement Reserve	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000	1,750,000
Reserves	229,450	482,007	482,007	229,450	390,294	390,294	229,450	436,977	436,977
Total Uses	21,633,635	21,886,192	10,114,814	17,748,635	17,909,479	10,023,101	19,743,635	19,951,162	10,069,784
Sources									
Private Loan	0	7,764,845	7,764,845	0	4,945,138	4,945,138	0	6,380,402	6,380,402
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	7,836,074	7,836,074	0	6,417,636	6,417,636	0	7,146,023	7,146,023	0
Seller Take Back Financing	10,200,000	10,200,000	0	6,500,000	6,500,000	0	8,400,000	8,400,000	0
Total Sources	18,036,074	25,800,919	7,764,845	12,917,636	17,862,774	4,945,138	15,546,023	21,926,426	6,380,402
(Gap)/Surplus	(51,597,561)	\$3,914,727	(51,348,969)	(54,830,999)	(546,701)	(50,077,963)	(54,197,612)	\$1,975,263	(51,689,382)
Operating Pro formas									
Year 1	606,137	101,023	101,023	386,026	64,338	64,338	498,065	83,011	83,011
Year 2	613,933	108,819	108,819	389,420	67,732	67,732	503,700	88,646	88,646
Year 5	637,457	132,343	132,343	399,202	77,513	77,513	520,476	105,422	105,422
Year 19	746,803	241,689	241,689	432,430	110,742	110,742	592,450	177,395	177,395
Year 20	754,339	249,225	249,225	433,678	111,990	111,990	596,898	181,844	181,844
Total	13,612,355	3,510,069	3,510,069	8,264,232	1,830,465	1,830,465	10,986,490	2,685,403	2,685,403

Approach	Hill Street PBV With Equity No Debt Comp Rehab	Hill Street PBV With Equity With Debt Comp Rehab	Hill Street PBV No Equity With Debt Comp Rehab	Hill Street RAD / Section 18 With Equity No Debt Comp Rehab	Hill Street RAD / Section 18 With Equity With Debt Comp Rehab	Hill Street RAD / Section 18 No Equity With Debt Comp Rehab	Hill Street RAD S18 Small PHA With Equity No Debt Comp Rehab	Hill Street RAD S18 Small PHA With Equity With Debt Comp Rehab	Hill Street RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	12	12	12	12	12	12	12	12	12
Gross Residential Revenue:	473,760	473,760	473,760	373,488	418,380	373,488	436,608	436,608	436,608
Less Vacancy and Bad Debt:	(23,688)	(23,688)	(23,688)	(18,674)	(20,919)	(18,674)	(21,830)	(21,830)	(21,830)
Effective Residential Income:	450,072	450,072	450,072	354,814	397,461	354,814	414,778	414,778	414,778
Other Income:	1,440	1,440	1,440	1,440	1,800	1,440	1,440	1,440	1,440
Gross Effective Income:	451,512	451,512	451,512	356,254	399,261	356,254	416,218	416,218	416,218
Less Residential OpEx	(126,756)	(126,756)	(126,756)	(126,756)	(158,445)	(126,756)	(126,756)	(126,756)	(126,756)
Replacement Reserves	(4,200)	(4,200)	(4,200)	(4,200)	(5,250)	(4,200)	(4,200)	(4,200)	(4,200)
Net Operating Income	320,556	320,556	320,556	225,298	235,566	225,298	285,262	285,262	285,262
Less Debt Service	0	(267,130)	(267,130)	0	(196,305)	(187,748)	0	(237,718)	(237,718)
Cash Flow	320,556	53,426	53,426	225,298	39,261	37,550	285,262	47,544	47,544
Uses									
Construction Cost	2,002,392	2,002,392	2,002,392	2,002,392	2,002,392	2,002,392	2,002,392	2,002,392	2,002,392
General Conditions/Overhead/ Profit	280,335	280,335	280,335	280,335	280,335	280,335	280,335	280,335	280,335
Hard Cost contingency	228,273	228,273	228,273	228,273	228,273	228,273	228,273	228,273	228,273
Acquisition	5,400,000	5,400,000	0	3,800,000	4,000,000	0	4,800,000	4,800,000	0
Relocation	42,000	42,000	42,000	42,000	52,500	42,000	42,000	42,000	42,000
Soft Costs(not including acquisition and developer fee)	627,750	627,750	376,650	627,750	627,750	376,650	627,750	627,750	376,650
Soft Cost Contingency	31,387	31,387	18,832	31,387	31,387	18,832	31,387	31,387	18,832
Developer Fee	745,521	745,521	294,848	665,521	675,521	294,848	715,521	715,521	294,848
Replacement Reserve	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000	600,000
Reserves	65,478	199,043	199,043	65,478	180,000	159,352	65,478	184,337	184,337
Total Uses	10,023,136	10,156,701	4,042,374	8,343,136	8,678,158	4,002,683	9,393,136	9,511,995	4,027,668
Sources									
Private Loan	0	4,106,443	4,106,443	0	3,017,689	2,886,147	0	3,654,308	3,654,308
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	3,687,848	3,687,848	0	3,074,470	3,156,056	0	3,457,831	3,457,831	0
Seller Take Back Financing	5,400,000	5,400,000	0	3,800,000	4,000,000	0	4,800,000	4,800,000	0
Total Sources	9,087,848	13,194,291	4,106,443	6,874,470	10,173,745	2,886,147	8,257,831	11,912,140	3,654,308
(Gap)/Surplus	(\$935,288)	\$3,037,590	\$64,069	(\$1,468,666)	\$1,495,587	(\$1,116,536)	(\$1,135,305)	\$2,400,145	(\$372,359)
Operating Pro formas									
Year 1	320,556	53,426	53,426	225,298	39,261	37,550	285,262	47,544	47,544
Year 2	325,721	58,591	58,591	228,557	42,414	40,809	289,720	52,002	52,002
Year 5	341,608	74,478	74,478	238,498	51,965	50,750	303,405	65,687	65,687
Year 19	423,586	156,456	156,456	287,533	97,332	99,785	373,177	135,459	135,459
Year 20	429,927	162,797	162,797	291,154	100,542	103,406	378,510	140,792	140,792
Total	7,467,453	2,124,853	2,124,853	5,152,925	1,396,016	1,397,965	6,609,892	1,855,532	1,855,532

Approach	Fashion Park Place PBV With Equity No Debt Comp Rehab	Fashion Park Place PBV With Equity With Debt Comp Rehab	Fashion Park Place PBV No Equity With Debt Comp Rehab	Fashion Park Place RAD / Section 18 With Equity No Debt Comp Rehab	Fashion Park Place RAD / Section 18 With Equity With Debt Comp Rehab	Fashion Park Place RAD / Section 18 No Equity With Debt Comp Rehab	Fashion Park Place RAD S18 Small PHA With Equity No Debt Comp Rehab	Fashion Park Place RAD S18 Small PHA With Equity With Debt Comp Rehab	Fashion Park Place RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	27	27	27	27	27	27	27	27	27
Gross Residential Revenue:	961,560	961,560	961,560	633,708	633,708	633,708	860,220	860,220	860,220
Less Vacancy and Bad Debt:	(48,078)	(48,078)	(48,078)	(31,685)	(31,685)	(31,685)	(43,011)	(43,011)	(43,011)
Effective Residential Income:	913,482	913,482	913,482	602,023	602,023	602,023	817,209	817,209	817,209
Other Income:	3,240	3,240	3,240	3,240	3,240	3,240	3,240	3,240	3,240
Gross Effective Income:	916,722	916,722	916,722	605,263	605,263	605,263	820,449	820,449	820,449
Less Residential OpEx	(285,201)	(285,201)	(285,201)	(285,201)	(285,201)	(285,201)	(285,201)	(285,201)	(285,201)
Replacement Reserves	(9,450)	(9,450)	(9,450)	(9,450)	(9,450)	(9,450)	(9,450)	(9,450)	(9,450)
Net Operating Income	622,071	622,071	622,071	310,612	310,612	310,612	525,798	525,798	525,798
Less Debt Service	0	(518,393)	(518,393)	0	(258,843)	(258,843)	0	(438,165)	(438,165)
Cash Flow	622,071	103,679	103,679	310,612	51,769	51,769	525,798	87,633	87,633
Uses									
Construction Cost	2,440,495	2,440,495	2,440,495	2,467,486	2,467,486	2,467,486	2,440,495	2,440,495	2,440,495
General Conditions/Overhead/ Profit	341,669	341,669	341,669	345,448	345,448	345,448	341,669	341,669	341,669
Hard Cost contingency	278,216	278,216	278,216	281,293	281,293	281,293	278,216	278,216	278,216
Acquisition	10,400,000	10,400,000	0	5,200,000	5,200,000	0	8,800,000	8,800,000	0
Relocation	94,500	94,500	94,500	94,500	94,500	94,500	94,500	94,500	94,500
Soft Costs(not including acquisition and developer fee)	765,095	765,095	459,057	773,557	773,557	464,134	765,095	765,095	459,057
Soft Cost Contingency	38,255	38,255	22,953	38,678	38,678	23,207	38,255	38,255	22,953
Developer Fee	1,099,560	1,099,560	363,689	845,969	845,969	367,607	1,019,560	1,019,560	363,689
Replacement Reserve	750,000	750,000	750,000	750,000	750,000	750,000	750,000	750,000	750,000
Reserves	147,326	406,522	406,522	147,326	276,747	276,747	147,326	366,408	366,408
Total Uses	16,355,117	16,614,313	5,157,102	10,944,257	11,073,679	5,070,422	14,675,117	14,894,199	5,116,988
Sources									
Private Loan	0	7,968,963	7,968,963	0	3,979,051	3,979,051	0	6,735,670	6,735,670
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	5,978,860	5,978,860	0	4,006,919	4,006,919	0	5,365,481	5,365,481	0
Seller Take Back Financing	10,400,000	10,400,000	0	5,200,000	5,200,000	0	8,800,000	8,800,000	0
Total Sources	16,378,860	24,347,823	7,968,963	9,206,919	13,185,971	3,979,051	14,165,481	20,901,151	6,735,670
(Gap)/Surplus	\$23,743	\$7,733,510	\$2,811,861	\$(1,737,338)	\$2,112,292	\$(1,091,371)	\$(100,630)	\$6,006,952	\$1,618,682
Operating Pro formas									
Year 1	622,071	103,679	103,679	310,612	51,769	51,769	525,798	87,633	87,633
Year 2	631,708	113,315	113,315	314,019	55,176	55,176	533,509	95,344	95,344
Year 5	661,263	142,871	142,871	324,130	65,287	65,287	557,054	118,889	118,889
Year 19	811,415	293,022	293,022	366,574	107,731	107,731	673,913	235,748	235,748
Year 20	822,849	304,457	304,457	369,112	110,269	110,269	682,598	244,433	244,433
Total	14,391,957	4,024,107	4,024,107	6,824,313	1,647,453	1,647,453	12,052,776	3,289,476	3,289,476

Approach	Concord Drive PBV With Equity No Debt Comp Rehab	Concord Drive PBV With Equity With Debt Comp Rehab	Concord Drive PBV No Equity With Debt Comp Rehab	Concord Drive RAD / Section 18 With Equity No Debt Comp Rehab	Concord Drive RAD / Section 18 With Equity With Debt Comp Rehab	Concord Drive RAD / Section 18 No Equity With Debt Comp Rehab	Concord Drive RAD \$18 Small PHA With Equity No Debt Comp Rehab	Concord Drive RAD \$18 Small PHA With Equity With Debt Comp Rehab	Concord Drive RAD \$18 Small PHA No Equity With Debt Comp Rehab
Unit Count	22	22	22	22	22	22	22	22	22
Gross Residential Revenue:	793,152	793,152	793,152	555,456	555,456	555,456	707,016	707,016	707,016
Less Vacancy and Bad Debt:	(39,658)	(39,658)	(39,658)	(27,773)	(27,773)	(27,773)	(35,351)	(35,351)	(35,351)
Effective Residential Income:	753,494	753,494	753,494	527,683	527,683	527,683	671,665	671,665	671,665
Other Income:	2,640	2,640	2,640	2,640	2,640	2,640	2,640	2,640	2,640
Gross Effective Income:	756,134	756,134	756,134	530,323	530,323	530,323	674,305	674,305	674,305
Less Residential OpEx	(232,386)	(232,386)	(232,386)	(232,386)	(232,386)	(232,386)	(232,386)	(232,386)	(232,386)
Replacement Reserves	(7,700)	(7,700)	(7,700)	(7,700)	(7,700)	(7,700)	(7,700)	(7,700)	(7,700)
Net Operating Income	516,048	516,048	516,048	290,237	290,237	290,237	434,219	434,219	434,219
Less Debt Service	0	(430,040)	(430,040)	0	(241,864)	(241,864)	0	(361,849)	(361,849)
Cash Flow	516,048	86,008	86,008	290,237	48,373	48,373	434,219	72,370	72,370
Uses									
Construction Cost	2,170,010	2,170,010	2,170,010	2,170,010	2,170,010	2,170,010	2,170,010	2,170,010	2,170,010
General Conditions/Overhead/ Profit	303,801	303,801	303,801	303,801	303,801	303,801	303,801	303,801	303,801
Hard Cost contingency	247,381	247,381	247,381	247,381	247,381	247,381	247,381	247,381	247,381
Acquisition	8,700,000	8,700,000	0	4,900,000	4,900,000	0	7,300,000	7,300,000	0
Relocation	77,000	77,000	77,000	77,000	77,000	77,000	77,000	77,000	77,000
Soft Costs(not including acquisition and developer fee)	680,298	680,298	408,179	680,298	680,298	408,179	680,298	680,298	408,179
Soft Cost Contingency	34,015	34,015	20,409	34,015	34,015	20,409	34,015	34,015	20,409
Developer Fee	950,326	950,326	322,678	760,326	760,326	322,678	880,326	880,326	322,678
Replacement Reserve	650,000	650,000	650,000	650,000	650,000	650,000	650,000	650,000	650,000
Reserves	120,043	335,063	335,063	120,043	240,975	240,975	120,043	300,968	300,968
Total Uses	13,932,874	14,147,895	4,534,522	9,942,874	10,063,807	4,440,434	12,462,874	12,643,799	4,500,426
Sources	0	0	0	0	0	0	0	0	0
Private Loan	0	6,610,774	6,610,774	0	3,718,048	3,718,048	0	5,562,511	5,562,511
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	4,648,151	4,648,151	0	3,211,895	3,211,895	0	4,119,004	4,119,004	0
Seller Take Back Financing	8,700,000	8,700,000	0	4,900,000	4,900,000	0	7,300,000	7,300,000	0
Total Sources	13,348,151	19,958,925	6,610,774	8,111,895	11,829,942	3,718,048	11,419,004	16,981,515	5,562,511
(Gap)/Surplus	(\$584,723)	\$5,811,030	\$2,076,252	(\$1,830,980)	\$1,766,136	(\$722,386)	(\$1,043,870)	\$4,337,716	\$1,062,085
Operating Pro formas									
Year 1	516,048	86,008	86,008	290,237	48,373	48,373	434,219	72,370	72,370
Year 2	524,084	94,044	94,044	293,757	51,892	51,892	440,618	78,769	78,769
Year 5	548,739	118,699	118,699	304,314	62,450	62,450	460,165	98,315	98,315
Year 19	674,258	244,218	244,218	351,744	109,880	109,880	557,386	195,536	195,536
Year 20	683,837	253,797	253,797	354,873	113,009	113,009	564,628	202,778	202,778
Total	11,949,726	3,348,919	3,348,919	6,463,108	1,625,821	1,625,821	9,961,492	2,724,505	2,724,505

Approach	Cuesta Del Mar PBV With Equity No Debt Comp Rehab	Cuesta Del Mar PBV With Equity With Debt Comp Rehab	Cuesta Del Mar PBV No Equity With Debt Comp Rehab	Cuesta Del Mar RAD / Section 18 With Equity No Debt Comp Rehab	Cuesta Del Mar RAD / Section 18 With Equity With Debt Comp Rehab	Cuesta Del Mar RAD / Section 18 No Equity With Debt Comp Rehab	Cuesta Del Mar RAD S18 Small PHA With Equity No Debt Comp Rehab	Cuesta Del Mar RAD S18 Small PHA With Equity With Debt Comp Rehab	Cuesta Del Mar RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	12	12	12	12	12	12	12	12	12
Gross Residential Revenue:	480,996	480,996	480,996	302,820	302,820	302,820	425,268	425,268	425,268
Less Vacancy and Bad Debt:	(24,050)	(24,050)	(24,050)	(15,141)	(15,141)	(15,141)	(21,263)	(21,263)	(21,263)
Effective Residential Income:	456,946	456,946	456,946	287,679	287,679	287,679	404,005	404,005	404,005
Other Income:	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440
Gross Effective Income:	458,386	458,386	458,386	289,119	289,119	289,119	405,445	405,445	405,445
Less Residential OpEx	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)
Replacement Reserves	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)
Net Operating Income	327,430	327,430	327,430	158,163	158,163	158,163	274,489	274,489	274,489
Less Debt Service	0	(272,859)	(272,859)	0	(131,803)	(131,803)	0	(228,741)	(228,741)
Cash Flow	327,430	54,572	54,572	158,163	26,361	26,361	274,489	45,748	45,748
Uses									
Construction Cost	1,201,092	1,201,092	1,201,092	1,201,092	1,201,092	1,201,092	1,201,092	1,201,092	1,201,092
General Conditions/Overhead/ Profit	168,153	168,153	168,153	168,153	168,153	168,153	168,153	168,153	168,153
Hard Cost contingency	136,924	136,924	136,924	136,924	136,924	136,924	136,924	136,924	136,924
Acquisition	5,500,000	5,500,000	0	2,700,000	2,700,000	0	4,600,000	4,600,000	0
Relocation	42,000	42,000	42,000	42,000	42,000	42,000	42,000	42,000	42,000
Soft Costs(not including acquisition and developer fee)	376,542	376,542	225,925	376,542	376,542	225,925	376,542	376,542	225,925
Soft Cost Contingency	18,827	18,827	11,296	18,827	18,827	11,296	18,827	18,827	11,296
Developer Fee	560,231	560,231	178,539	420,231	420,231	178,539	515,231	515,231	178,539
Replacement Reserve	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000
Reserves	65,478	201,907	201,907	65,478	131,379	131,379	65,478	179,848	179,848
Total Uses	8,419,247	8,555,676	2,515,837	5,479,247	5,545,148	2,445,309	7,474,247	7,588,617	2,493,778
Sources	0	0	0	0	0	0	0	0	0
Private Loan	0	4,194,504	4,194,504	0	2,026,127	2,026,127	0	3,516,302	3,516,302
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	3,086,694	3,086,694	0	2,013,281	2,013,281	0	2,741,668	2,741,668	0
Seller Take Back Financing	5,500,000	5,500,000	0	2,700,000	2,700,000	0	4,600,000	4,600,000	0
Total Sources	8,586,694	12,781,198	4,194,504	4,713,281	6,739,409	2,026,127	7,341,668	10,857,970	3,516,302
(Gap)/Surplus	\$167,447	\$4,225,521	\$1,678,667	(\$665,966)	\$1,194,260	(\$619,181)	(\$112,579)	\$3,269,353	\$1,022,524
Operating Pro formas									
Year 1	327,430	54,572	54,572	158,163	26,361	26,361	274,489	45,748	45,748
Year 2	332,732	59,874	59,874	160,080	28,277	28,277	278,732	49,991	49,991
Year 5	349,049	76,191	76,191	165,829	34,026	34,026	291,744	63,003	63,003
Year 19	433,404	160,545	160,545	191,649	59,846	59,846	357,790	129,050	129,050
Year 20	439,942	167,083	167,083	193,351	61,549	61,549	362,816	134,075	134,075
Total	7,634,478	2,177,308	2,177,308	3,521,731	885,681	885,681	6,348,137	1,773,327	1,773,327

Approach	Fremont Square PBV With Equity No Debt Comp Rehab	Fremont Square PBV With Equity With Debt Comp Rehab	Fremont Square PBV No Equity With Debt Comp Rehab	Fremont Square RAD / Section 18 With Equity No Debt Comp Rehab	Fremont Square RAD / Section 18 With Equity With Debt Comp Rehab	Fremont Square RAD / Section 18 No Equity With Debt Comp Rehab	Fremont Square RAD S18 Small PHA With Equity No Debt Comp Rehab	Fremont Square RAD S18 Small PHA With Equity With Debt Comp Rehab	Fremont Square RAD S18 Small PHA No Equity With Debt Comp Rehab
Unit Count	12	12	12	12	12	12	12	12	12
Gross Residential Revenue:	473,760	473,760	473,760	295,584	295,584	295,584	418,032	418,032	418,032
Less Vacancy and Bad Debt:	(23,688)	(23,688)	(23,688)	(14,779)	(14,779)	(14,779)	(20,902)	(20,902)	(20,902)
Effective Residential Income:	450,072	450,072	450,072	280,805	280,805	280,805	397,130	397,130	397,130
Other Income:	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440
Gross Effective Income:	451,512	451,512	451,512	282,245	282,245	282,245	398,570	398,570	398,570
Less Residential OpEx	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)	(126,756)
Replacement Reserves	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)	(4,200)
Net Operating Income	320,556	320,556	320,556	151,289	151,289	151,289	267,614	267,614	267,614
Less Debt Service	0	(267,130)	(267,130)	0	(126,074)	(126,074)	0	(223,012)	(223,012)
Cash Flow	320,556	53,426	53,426	151,289	25,215	25,215	267,614	44,602	44,602
Uses									
Construction Cost	1,189,052	1,189,052	1,189,052	1,189,052	1,189,052	1,189,052	1,189,052	1,189,052	1,189,052
General Conditions/Overhead/ Profit	166,467	166,467	166,467	166,467	166,467	166,467	166,467	166,467	166,467
Hard Cost contingency	135,552	135,552	135,552	135,552	135,552	135,552	135,552	135,552	135,552
Acquisition	5,400,000	5,400,000	0	2,600,000	2,600,000	0	4,500,000	4,500,000	0
Relocation	42,000	42,000	42,000	42,000	42,000	42,000	42,000	42,000	42,000
Soft Costs(not including acquisition and developer fee)	372,768	372,768	223,661	372,768	372,768	223,661	372,768	372,768	223,661
Soft Cost Contingency	18,638	18,638	11,183	18,638	18,638	11,183	18,638	18,638	11,183
Developer Fee	552,372	552,372	176,792	412,372	412,372	176,792	507,372	507,372	176,792
Replacement Reserve	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000
Reserves	65,478	199,043	199,043	65,478	128,515	128,515	65,478	176,984	176,984
Total Uses	8,292,327	8,425,892	2,493,750	5,352,327	5,415,364	2,423,222	7,347,327	7,458,833	2,471,691
Sources	0	0	0	0	0	0	0	0	0
Private Loan	0	4,106,443	4,106,443	0	1,938,066	1,938,066	0	3,428,241	3,428,241
Deferred fees	0	0	0	0	0	0	0	0	0
LIHTC Equity	3,038,749	3,038,749	0	1,965,337	1,965,337	0	2,693,724	2,693,724	0
Seller Take Back Financing	5,400,000	5,400,000	0	2,600,000	2,600,000	0	4,500,000	4,500,000	0
Total Sources	8,438,749	12,545,192	4,106,443	4,565,337	6,503,403	1,938,066	7,193,724	10,621,965	3,428,241
(Gap)/Surplus	\$146,422	\$4,119,300	\$1,612,693	(\$196,991)	\$1,088,039	(\$485,156)	(\$113,604)	\$3,163,132	\$956,550
Operating Pro formas									
Year 1	320,556	53,426	53,426	151,289	25,215	25,215	267,614	44,602	44,602
Year 2	325,721	58,591	58,591	153,068	26,994	26,994	271,720	48,708	48,708
Year 5	341,608	74,478	74,478	158,388	32,314	32,314	284,303	61,291	61,291
Year 19	423,586	156,456	156,456	181,831	55,757	55,757	347,972	124,960	124,960
Year 20	429,927	162,797	162,797	183,337	57,263	57,263	352,801	129,789	129,789
Total	7,467,453	2,124,853	2,124,853	3,354,706	833,226	833,226	6,181,112	1,720,872	1,720,872

Approach	Palm Vista Sr. Apt PBV With Equity No Debt Comp Rehab	Palm Vista Sr. Apt PBV With Equity With Debt Comp Rehab	Palm Vista Sr. Apt PBV No Equity With Debt Comp Rehab	Palm Vista Sr. Apt RAD / Section 18 With Equity No Debt Comp Rehab	Palm Vista Sr. Apt RAD / Section 18 With Equity With Debt Comp Rehab	Palm Vista Sr. Apt RAD / Section 18 No Equity With Debt Comp Rehab	Palm Vista Sr. Apt RAD S18 Small PHA With Equity No Debt Comp Rehab	Palm Vista Sr. Apt RAD S18 Small PHA With Equity With Debt Comp Rehab	Palm Vista Sr. Apt RAD S18 Small PHA With Equity With Debt Comp Rehab
Unit Count	100	100	100	100	100	100	100	100	100
Gross Residential Revenue:	2,365,200	2,365,200	2,365,200	1,757,040	1,912,560	1,912,560	2,061,120	2,216,640	2,216,640
Less Vacancy and Bad Debt:	(118,260)	(118,260)	(118,260)	(87,852)	(95,628)	(95,628)	(103,056)	(110,832)	(110,832)
Effective Residential Income:	2,246,940	2,246,940	2,246,940	1,669,188	1,816,932	1,816,932	1,958,064	2,105,808	2,105,808
Other Income:	12,000	12,000	12,000	12,000	12,000	12,000	12,000	12,000	12,000
Gross Effective Income:	2,258,940	2,258,940	2,258,940	1,681,188	1,828,932	1,828,932	1,970,064	2,117,808	2,117,808
Less Residential OpEx	(788,900)	(788,900)	(788,900)	(788,900)	(788,900)	(788,900)	(788,900)	(788,900)	(788,900)
Replacement Reserves	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)	(35,000)
Net Operating Income	1,435,040	1,435,040	1,435,040	857,288	1,005,032	1,005,032	1,146,164	1,293,908	1,293,908
Less Debt Service	0	(1,195,867)	(1,195,867)	0	(837,527)	(837,527)	0	(1,078,257)	(1,078,257)
Cash Flow	1,435,040	239,173	239,173	857,288	167,505	167,505	1,146,164	215,651	215,651
Uses									
Construction Cost	10,763,784	10,763,784	10,763,784	10,763,784	10,763,784	10,763,784	10,763,784	10,763,784	10,763,784
General Conditions/Overhead/ Profit	1,506,930	1,506,930	1,506,930	1,506,930	1,506,930	1,506,930	1,506,930	1,506,930	1,506,930
Hard Cost contingency	1,227,071	1,227,071	1,227,071	1,227,071	1,227,071	1,227,071	1,227,071	1,227,071	1,227,071
Acquisition	24,000,000	24,000,000	0	14,300,000	16,800,000	0	19,200,000	21,600,000	21,600,000
Relocation	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000
Soft Costs(not including acquisition and developer fee)	3,374,446	3,374,446	2,024,668	3,374,446	3,374,446	2,024,668	3,374,446	3,374,446	3,374,446
Soft Cost Contingency	168,722	168,722	101,233	168,722	168,722	101,233	168,722	168,722	168,722
Developer Fee	3,756,143	3,756,143	1,597,369	3,271,143	3,396,143	1,597,369	3,516,143	3,636,143	3,636,143
Replacement Reserve	850,000	850,000	850,000	850,000	850,000	850,000	850,000	850,000	850,000
Reserves	411,950	1,009,883	1,009,883	411,950	830,713	830,713	411,950	951,078	951,078
Total Uses	46,409,046	47,006,980	19,430,938	36,224,046	39,267,810	19,251,768	41,369,046	44,428,175	44,428,175
Sources									
Private Loan	0	18,383,402	18,383,402	0	12,874,838	12,874,838	0	16,575,448	16,575,448
Deferred fees	1,256,143	1,256,143	0	771,143	896,143	0	1,016,143	1,136,143	1,136,143
LIHTC Equity	17,954,674	17,954,674	0	14,236,066	15,194,470	0	16,114,538	17,034,606	17,034,606
Seller Take Back Financing	24,000,000	24,000,000	0	14,300,000	16,800,000	0	19,200,000	21,600,000	21,600,000
Total Sources	43,210,817	61,594,219	18,383,402	29,307,209	45,765,451	12,874,838	36,330,681	56,346,197	56,346,197
(Gap)/Surplus	(\$3,198,229)	\$14,587,240	(\$1,047,536)	(\$6,916,837)	\$6,497,642	(\$6,376,930)	(\$5,038,365)	\$11,918,023	\$11,918,023
Operating Pro formas									
Year 1	1,435,040	239,173	239,173	857,288	167,505	167,505	1,146,164	215,651	215,651
Year 2	1,456,027	260,160	260,160	866,720	179,892	179,892	1,161,373	233,815	233,815
Year 5	1,520,088	324,221	324,221	894,710	217,107	217,107	1,207,399	289,065	289,065
Year 19	1,837,516	641,650	641,650	1,012,344	385,832	385,832	1,424,930	557,688	557,688
Year 20	1,861,065	665,198	665,198	1,019,389	397,098	397,098	1,440,227	577,205	577,205
Total	32,878,934	8,961,600	8,961,600	18,841,080	5,680,337	5,680,337	25,860,007	7,884,664	7,884,664

Annual Capital Fund Plan (CFP)

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

US Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226

[illegible]

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

US Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226

Part I: Summary	
PHA Name: Oxnard Housing Authority	Grant Type and Number Capital Fund Program Grant No: CA16-F031-501-23 Replacement Housing Factor Grant No: Date of CFFP: 04/26/2004
FFY of Grant: 2023 FFY of Grant Approval:	
Type of Grant: ☒ Original annual Statement ☐ Performance and Evaluation Report for Period Ending:	
☐ Reserve for Disasters/Emergencies ☐ Revised Annual Statement (Revision no:) ☐ Final Performance and Evaluation Report	
Line	Summary by Development Account
	Original
	Revised ²
	Obligated
	Expended
	Total Actual Cost ¹
24	Amount of line 23 Related to LBP Activities
25	Amount of line 23 Related to Section 504 compliance
26	Amount of line 23 Related to Security - Soft Costs
27	Amount of line 23 Related to Security - Hard Costs
28	Amount of line 23 Related to Energy Conservation Measures
Signature of Executive Director	
Date	
Signature of Public Housing Director	
Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

[illegible]

form HUD-50075.1

PHA Name:

Capital Fund Program Grant

Capital Fund Program Grant No: CA16-P031-501-23

Federal FFY of Grant:

2023

CA16-P031-501-23 Total:

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Oxnard Housing Authority		Grant Type and Number Capital Fund Program Grant No: CA16-P031-501-23 CFFP (Yes/ No): Yes		Federal FFY of Grant: 2023	
		Replacement Housing Factor Grant No:			
Development Number Name/HA-Wide Activities	All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reason for Revised target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
CAL 31-0	4/16/2025		4/16/2027		
PHA-Wide					
CAL 31-2	4/16/2025		4/16/2027		
Felicia Court					
CAL 31-3	4/16/2025		4/16/2027		
Colonia Road					
CAL 31-4	4/16/2025		4/16/2027		
Pleasant Valley					
CAL 31-5	4/16/2025		4/16/2027		
Plaza Vista					
CAL 31-7	4/16/2025		4/16/2027		
Scattered Sites					
CAL 31-8	4/16/2025		4/16/2027		
Palm Vista					

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Five Year Capital Fund Plan (CFP)

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name: Oxnard Housing Authority				[X] Original 5-Year Plan [] Revision no:	
Development Number/Name/HA-Wide	Year 1 2023	Work Statement for Year 2 FFY Grant: 2024 PHA FY: 2025	Work Statement for Year 3 FFY Grant: 2025 PHA FY: 2026	Work Statement for Year 4 FFY Grant: 2026 PHA FY: 2027	Work Statement for Year 5 FFY Grant: 2027 PHA FY: 2028
	Annual Statement				
CAL 31-0 OHA-Wide		\$ 357,000.00	\$ 377,000.00	\$ 357,000.00	\$ 337,000.00
OHA Wide		\$ -	\$ 100,000.00	\$ -	\$ 720,000.00
CAL 31-1 The Courts					
CAL 31-2 Felicia Court			\$ -	\$ -	\$ -
CAL 31-3 Colonia Road		\$ 140,000.00	\$ 290,000.00		\$ -
CAL 31-4 Pleasant Valley		\$ -	\$ -	\$ 400,000.00	\$ -
CAL 31-5 Plaza Vista		\$ 280,000.00	\$ -	\$ -	\$ -
CAL 31-7 Scattered Sites		\$ -	\$ 290,000.00	\$ 300,000.00	\$ -
CAL 31-8 Palm Vista		\$ 280,000.00	\$ -	\$ -	\$ -
CFP Funds Listed for 5-year Planning		\$ 1,057,000.00	\$ 1,057,000.00	\$ 1,057,000.00	\$ 1,057,000.00
Replacement Housing Factor Funds					

Capital Fund Program Five-Year Action Plan						
Part II: Supporting Pages - Work Activities						
Activities for Year 1 2023	Activities for Year: 2 FFY Grant: 2024 PHA FY: 2025			Activities for Year: 3 FFY Grant: 2025 PHA FY: 2026		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	PHA-Wide	Operations	\$ 140,000.00	PHA-Wide	Operations	\$ 140,000.00
	Cal 31-0			Cal 31-0		
		Management Improvement	\$ 12,000.00		Management Improvement	\$ 12,000.00
		Administration	\$ 105,000.00		Administration	\$ 105,000.00
		A&E Fees	\$ 20,000.00		A&E Fees	\$ 20,000.00
		Advertising	\$ 5,000.00		Advertising	\$ 5,000.00
		Planning Salaries/ Benefits	\$ 40,000.00		Planning Salaries/ Benefits	\$ 40,000.00
		Energy Audit	\$ 20,000.00		Computer Hardware	\$ 20,000.00
		Debt Service	-		Physical Needs Assessment	\$ 20,000.00
		Contingency	\$ 15,000.00		Contingency	\$ 15,000.00
	Cal 31-0 Subtotal:		\$ 357,000.00	Cal 31-0 Subtotal:		\$ 377,000.00

(Page 2 of 5)

Capital Fund Program Five-Year Action Plan						
Part II: Supporting Pages - Work Activities						
Activities for Year 1 2023	Activities for Year: 2 FFY Grant: 2024 PHA FY: 2025			Activities for Year: 3 FFY Grant: 2025 PHA FY: 2026		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	OHA Wide			OHA Wide	RAD	
					Preliminary Development Work	\$ 100,000.00
	OHA Wide Subtotal:		\$ -	OHA Wide Subtotal:		\$ 100,000.00
	Colonia Village			Felicia Court		
	CAL 31-3	Alley Repair	\$ 140,000.00	CAL 31-2	Walkways	\$ 290,000.00
	CAL 31-3 Subtotal		\$ 140,000.00	CAL 31-2 Subtotal		\$ 290,000.00
	Plaza Vista			Pleasant Valley		
	CAL 31-5	Elevator	\$ 280,000.00	CAL 31-4		
	CAL 31-5 Subtotal:		\$ 280,000.00	CAL 31-4 Subtotal:		\$ -
	Scattered Sites			Scattered Sites		
	CAL 31-7			CAL 31-7	Furnaces	\$ 290,000.00
				CAL 31-7 Subtotal:		\$ 290,000.00
	CAL 31-7 Subtotal:					
	Palm Vista					
	CAL 31-8	Elevator	\$ 280,000.00	Palm Vista		
				CAL 31-8		
	CAL 31-8 Subtotal:		\$ 280,000.00	CAL 31-8 Subtotal:		\$ -
	Total CFP Estimated Cost		\$ 1,057,000.00	Total CFP Estimated Cost		\$ 1,057,000.00

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages --- Work activities

Activities for Year: 4 FFY Grant: 2026 PHA FY: 2027			Activities for Year: 5 FFY Grant: 2027 PHA FY: 2028		
Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
PHA-Wide	Operations	\$ 140,000.00	PHA-Wide	Operations	\$ 140,000.00
Cal 31-0			Cal 31-0		
	Management Improvement	\$ 12,000.00		Management Improvement	\$ 12,000.00
	Administration	\$ 105,000.00		Administration	\$ 105,000.00
	A&E Fees	\$ 20,000.00		A&E Fees	\$ 20,000.00
	Advertising	\$ 5,000.00		Advertising	\$ 5,000.00
	Planning Salaries/ Benefits	\$ 40,000.00		Planning Salaries/ Benefits	\$ 40,000.00
	Computer Hardware	\$ 20,000.00		Computer Hardware	
	Contingency	\$ 15,000.00		Contingency	\$ 15,000.00
Cal 31-0 Subtotal:		\$ 357,000.00	Cal 31-0 Subtotal:		\$ 337,000.00

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Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages --- Work activities

Activities for Year: 4 FFY Grant: 2026 PHA FY: 2027			Activities for Year: 5 FFY Grant: 2027 PHA FY: 2028		
Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
OHA Wide			OHA Wide	Windows	\$ 370,000.00
Felicia Court				Water Meters	\$ 350,000.00
CAL 31-2	Walkways				
	Windows				
CAL 31-2 Subtotal:		\$ -	OHA Wide Subtotal		\$ 720,000.00
Colonia Village			CAL 31-2 Subtotal:		
CAL 31-3			Colonia Village		
CAL 31-3 Subtotal			CAL 31-3		
			CAL 31-3 Subtotal		
Pleasant Valley					
CAL 31-4	Flooring	\$ 400,000.00	Pleasant Valley		
			CAL 31-4		
CAL 31-4 Subtotal:		\$ 400,000.00	CAL 31-4 Subtotal:		
Plaza Vista			Plaza Vista		
CAL 31-5			CAL 31-5		
CAL 31-5 Subtotal:			CAL 31-5 Subtotal:		
Scattered Sites			Scattered Sites		
CAL 31-7	Building Redevelopment	\$ 300,000.00	CAL 31-7		
CAL 31-7 Subtotal:		\$ 300,000.00	CAL 31-7 Subtotal:		\$ -
CAL 31-8 Subtotal:			CAL 31-8 Subtotal:		
Total CFP Estimated Cost		\$ 1,057,000.00	Total CFP Estimated Cost		\$ 1,057,000.00

HOUSING AUTHORITY OF THE CITY OF OXNARD

RESOLUTION NO. _____

RESOLUTION APPROVING THE 5-YEAR PUBLIC HOUSING AGENCY (PHA) PLAN, THE ANNUAL AGENCY PLAN, THE 2023 CAPITAL FUND PROGRAM (CFP) BUDGET, THE CFP FIVE-YEAR ACTION PLAN AND AUTHORIZING THE HOUSING DIRECTOR TO EXECUTE AND SUBMIT THE PLANS AND CAPITAL FUNDS STATEMENT

WHEREAS, the Housing Authority of the City of Oxnard (OHA) is required by the U.S. Department of Housing and Urban Development (HUD) to develop and adopt a 5-Year PHA Plan and Annual Agency Plan for HUD's review and approval in order to be eligible to receive HUD funding utilized for the OHA's operation; and

WHEREAS, The OHA adopted a 5-Year Agency Plan in 2020; and

WHEREAS, on March 7, 2023, the OHA conducted a public hearing on the proposed fourth year of the 2020-2025 Five-Year PHA Plan, the Annual Agency Plan, the 2023 CFP Budget and the CFP Five-Year Action Plan.

WHEREAS, the OHA wishes to adopt its Annual Agency Plan, the fourth year of the 5-Year PHA Plan for Fiscal Years 2020-2025, the CFP Five-Year Action Plan, and the 2023 CFP Budget.

NOW THEREFORE, the Board of Commissioners of the Housing Authority of the City of Oxnard resolves as follows:

1. The Board hereby approves the Annual Agency Plan, the third year of the 5-Year PHA Plan for Fiscal Years 2020-2025, the CFP Five-Year Action Plan, and the 2023 CFP Budget, as presented to the Board on March 7, 2023; and
2. The Board authorizes and directs the chairman to execute the HUD Public Housing Agency Certification Compliance Form certifying the Housing Authority's compliance with HUD's policies and procedures; and
3. The Board authorizes the Housing Director to execute and submit all reports and documents required to comply with HUD's policies and procedures regarding the Agency Plan; and
4. The Board authorizes the Housing Director to accept and expend the funds as indicated in the 2023 CFP Budget and the CFP Five-Year Action Plan.

APPROVED AND ADOPTED THIS _____ DAY OF _____ 2023 BY THE
FOLLOWING VOTE:

AYES:

NOES:

ABSENT:

John C. Zaragoza, Chairman

Attest:

Rose Chaparro, Secretary-Designate

Approved as to form:

Stephen M. Fischer, General Counsel

5-YEAR AGENCY PLAN AND ANNUAL PLAN

Emilio Ramirez, Director
Housing Department

Community Services, Public Safety, Housing & Development Committee
February 28, 2023

5-Year and Annual Agency Plan

1. The 5-Year PHA and the Annual Agency Plan provide a description of the Housing Authority's basic regulations, requirements and operational program policies. The current 5-Year PHA plan was adopted in 2020. The Annual Agency plan outlines any revisions, new activities, and progress towards the PHA's goals and objectives.
2. Required by 24 CFR Part 903
3. Serves as the application for Capital Fund Grants which provide the funding for capital improvements for Public Housing
4. Due to HUD by April 14, 2023 – at least 75 days prior to the start of the fiscal year

Proposed Revisions

1. Proposed Amendment to the Housing Choice Voucher (Section 8) Administrative Plan:

-Adoption of local limited homeless preference: Applicants and families who meet the definition of “homeless” will be eligible. A certification of homelessness completed by a homeless services provider is required. The OHA limits the number of families that qualify for the homeless preference to fifteen (15) families annually.

Proposed New Activities

The OHA intends to undertake the following new activities related to the following in the 2023 Annual PHA Plan:

1. Conversion of Public Housing to Project Based: In June 2020, the OHA launched the “Rethink and Renew” effort to streamline operations, improve customer services, modernize public housing units, expand programs, and close budget deficits. As part of the effort, the Department of Housing and Urban Development approved for CVR Associates, Inc. (CVR) to provide an assessment of the OHA’s public housing portfolio.

- CVR issued a report that outlines various strategies to transition the OHA’s public housing portfolio to a Section 8 subsidy. This action will provide a more stable stream of subsidy, is more conducive to raising debt/equity, and will allow OHA to leverage funding for rehabilitation of its public housing units.

- The OHA proposes to begin the process of analyzing the feasibility of the strategic opportunities identified by CVR through related activities including: physical needs assessments, financial analysis, and environmental reviews, and development of an asset repositioning plan.

2. Project-based vouchers: In addition, the OHA will undertake efforts to identify and apply for new voucher allocations for project-based vouchers. The project-based voucher is subsidized housing assistance that is tied to a specific unit. The goal is to increase the number of affordable units available to low-income families.

Capital Fund Budget

1. Purpose of the capital fund program is to maintain and preserve the integrity of the Oxnard Housing Authority's public housing units and to fund necessary improvements

2. The Fiscal Year 2023 requested capital fund budget is: \$1,538,180

3. Approximately \$740,000 will be used towards capital improvements:

- 504-conversion project which refers to the multi-phase project through which 24 existing units are being converted to ensure they accessible to individuals with disabilities. This is a requirement from the Department of Housing and Urban Development.

- All public housing units will be inspected and any necessary repairs will be completed to ensure they meet federal inspection standards.

The remaining funds will be allocated towards debt repayment and administrative expenses.

Public Comments

1. The forty-five day public comment period commenced on December 1, 2022
2. Staff held public meetings on December 1, 2022 and January 26, 2023.
3. The following questions were received (summarized)

Question: Is the homeless preference the same program that has been existence?

Response: Yes. The preference relates to the homeless set aside program which has been in existence por the past 7 years. The preference would apply to applicants for the 15 homeless set aside vouchers.

Question: Can the capital fund be used to paint the interior of all public housing units?

Response: Funds are being allocated towards repairs identified during unit inspections. However; public housing residents are asked to report their request for their individual unit by placing a work order.

Recommendation

That the Housing and Economic Development Committee recommend that the Housing Authority of the City of Oxnard:

1. Hold a public hearing to receive comments concerning the third year of the 5-Year PHA Plan, the 2023 Capital Fund Program (CFP) Budget, and the CFP Five-Year Action Plan; and
2. Adopt a resolution:
 - a) Approving the 2023 Annual Agency Plan, 5-Year PHA Plan for the Housing Authority;
 - b) Authorizing and directing the Chairman to execute the Department of Housing and Urban Development (HUD) Public Housing Agency Certification Compliance Form certifying the Housing Authority's compliance with HUD's policies and procedures;
 - c) Authorizing the Housing Director to execute and submit all reports, documents and all other certifications required to comply with HUD's policies and procedures regarding the Annual Agency Plan and the 5-Year PHA Plan;
 - d) Approving the 2023 CFP Budget and CFP Five-Year Action Plan; and
 - e) Authorizing the Housing Director to accept and expend the funds as indicated in the 2023 CFP Budget and CFP Five-Year Action Plan.



End of Presentation



COMMUNITY SERVICES, PUBLIC SAFETY, HOUSING & DEVELOPMENT COMMITTEE AGENDA REPORT

REPORTS AGENDA ITEM NO. D.3

DATE: February 14, 2023

TO: Community Services, Public Safety, Housing & Development Committee

FROM: Emilio Ramirez, Housing Director, (805) 385-8094, emilio.ramirez@oxnard.org

SUBJECT: Fiscal year 2023-24 Annual Action Plan public hearing to receive public comments relating to unmet needs of low- and moderate-income persons residing in the City of Oxnard. (30 minutes)

RECOMMENDATION

That the Community Services, Public Safety, Housing & Development Committee conduct a public hearing to receive public comments related to the unmet needs of low- and moderate-income persons residing in the City of Oxnard, for affordable housing, community and economic development, public services and homelessness for the preparation of the Fiscal Year 2023-24 Annual Action Plan.

Please click the following link to view the required Measure M pre-recorded presentation video: <https://youtu.be/cvU9NIRYot8>

BACKGROUND

The City of Oxnard annually receives entitlement grant funding from the United States Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG), HOME Investment Partnerships Act (HOME) and Health Emergency Solutions Grant (HESG) programs. To receive these entitlement grants for Fiscal Year 2023-24, beginning on July 1, 2023, the City of Oxnard must have an approved Consolidated Plan that establishes the goals and objectives for five years; and prepare, submit, and receive approval of an Annual Action Plan, before entitlement grant funds are disbursed. The local procedures to approve these documents are set forth in the Citizen Participation Plan (See Attachment 1). The process requires public hearings to solicit input on an Annual Plan. The subject meeting is one of several forums to allow for public participation in the development of the Annual Plan.

HUD's Formula Grant Programs

During Fiscal Year 2022-23, the City of Oxnard received \$2,365,280 in CDBG funds, \$855,503 in HOME funds, and \$211,474 in HESG funding. It is anticipated that the City's Fiscal Year 2023-24 Entitlement Grant award will be within 5% of the previous award received. Funds are subject to change based on federal appropriations and any changes to the HUD grant allocation formulas.

The CDBG Program provides funding to support activities such as neighborhood park improvements, alley and street improvements, facility improvements, homeownership assistance, owner-occupied mobile home rehabilitation, housing rehabilitation and public service activities that benefit low and moderate-income residents.

The HOME Program funding can be used to support low- and moderate-income families access affordable housing through down payment assistance, funding for the rehabilitation of single family and mobile home units. HOME funds can also be used to support the construction of new for sale or rental affordable housing units, through partnerships with housing developers.

Hearth Emergency Solutions Grant funding provides funding to support the homeless population through street outreach, emergency shelter operations, rental assistance and case management.

Annual Action Plan Process

Each year the City of Oxnard must submit an Annual Action Plan, which serves as an application for its three entitlements grant programs referenced above. The Annual Action Plan identifies specific activities, goals and funding allocations for the program year. HUD requires that grantees provide opportunities for the public to participate in the development of the Annual Action Plans. Community involvement is a key component of the preparation of the Annual Action Plan. Community meetings were held in January and February 2023, and a Resident Input of Community Need survey was released in English and Spanish.

The City of Oxnard Citizen's Participation Plan requires two public hearings per year to receive comments relating to the unmet needs of low- and moderate-income persons residing in the City of Oxnard, for affordable housing, community and economic development, and public services and homelessness. The public hearings are an opportunity for Oxnard residents to comment on the needs of the community. An addendum to the December 9, 2022 public notice was published in the VIDA Newspaper on January 12, 2023 in Spanish and English.

The Housing Department issued a Notice of Funding Availability (NOFA) announcing the availability of Fiscal Year 2023-24 Entitlement Grant funding in January of 2023. The NOFA invites non-profit providers and City departments to apply for a portion of the City's CDBG, HOME, or HESG funding for an activity or service that primarily benefits low- and moderate-income persons. In order to apply, service providers must attend a mandatory workshop. The community meeting schedule, survey, grant application, workshop schedule and workshop registration information can be located on the Oxnard Housing Department website.

Staff will develop and present funding recommendations, the Fiscal Year 2023-24 Annual Action Plan, and the submittal for funding approval to the City Council. Additional public hearings are tentatively scheduled at the Community Services, Public Safety, Housing & Development Committee meeting on April 25, 2023 and City Council on May 16, 2023. Staff then prepares the 2023-24 Annual Action Plan for electronic submittal to HUD. In addition to the Annual Action Plan, the City of Oxnard is required to submit funding applications and enter into funding agreements with HUD.

Upon HUD's approval, the Fiscal Year 2023-24 Annual Action Plan will become the funding instrument to implement the activities approved by the City Council to meet the goals and objectives set forth in the Consolidated Plan. The City of Oxnard will receive the funding from HUD in late 2023.

STRATEGIC PRIORITIES

This agenda item supports Economic Development strategy. The purpose of Economic Development strategy is to focus on the retention and expansion of Oxnard businesses by increasing the skills and employability of our local workforce, invite new business investments, and target site-based redevelopment opportunities.

This agenda item supports the Quality of Life strategy. The purpose of the Quality of Life strategy is to restore and increase quality services and programs that enrich Oxnard's diverse community, promotes safe neighborhoods, encourages community engagement, and supports our residents in their efforts to improve their quality of life.

FINANCIAL IMPACT

There is no financial impact in conducting the public hearing.

Prepared by: Emilio Ramirez, Housing Director

ATTACHMENTS

1. Oxnard Citizen Participation Plan
2. PowerPoint Presentation

City of Oxnard

Citizen Participation Plan

Amended July 10, 2018

CARES Act Addendum October 6, 2020

Prepared by:

City of Oxnard – Housing Department – Grants Management

435 South D Street, Oxnard, California, 93030

E-mail Address: grantsmanagement@oxnard.org



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Introduction

Pursuant to Title 24, Code of Federal Regulations, Part 91.105, HUD entitlement cities are required to adopt a citizen participation plan. Subsection (a) requires that citizen participation plans adopted prior to August 17, 2015 need to incorporate newer provisions of the 24 CFR 91.105. The City of Oxnard originally adopted its Citizen Participation Plan on October 18, 1994. On July 25, 2000 the original document was amended. This amended Citizen Participation Plan will incorporate provisions to comply with 24 CFR 91.105.

Purpose of the Citizen Participation Plan (CPP)

The Citizen Participation Plan sets forth the policies and procedures for citizen participation in the development of the City of Oxnard (City) Consolidated Plan and Annual Action Plan, any substantial amendments to these plans and the preparation of the Consolidated Annual Performance and Evaluation Report (CAPER), and the Assessment of Fair Housing (AFH), in coordination with the Oxnard Housing Authority (OHA).

The City shall provide the public with a reasonable opportunity to comment on the original Citizen Participation Plan and any amendments thereto. Amendments to the Citizen Participation Plan may be considered substantial or less than substantial as determined by the City based on the nature of the amendment and applicable HUD regulations. The 2018 amendment to the Citizen Participation Plan is substantial.

Encouragement of Citizen Participation

A key component of the Citizen Participation Plan is that it must provide for and encourage citizen participation, especially by low- and moderate-income persons, and in particular those persons living in areas designated by the City as a revitalization area or in a slum or blighted areas and residents of predominantly low- and moderate-income neighborhoods, and where CDBG funds are proposed to be used.

The City shall explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods. Efforts must be taken to encourage the participation of all its citizens, including minorities and non-English speaking persons, and persons with disabilities.

Consolidated Plan and Annual Action Plan Preparation

The Citizen Participation Plan addresses the preparation cycles for the Oxnard Consolidated Plans and Annual Action Plans.

The U.S. Department of Housing and Urban Development (HUD) requires a community receiving funding under Community Planning and Development formula grant programs to submit to HUD a multi-year consolidated plan and annual action plan.

The consolidated plan is a program and funding implementation plan combined in one document that states the City of Oxnard's goals and objectives for housing and community planning and development. In addition, a community must have a consolidated plan approved by HUD before receiving funds under the formula grant programs; Community Development Block Grant (CDBG), including activities under Section 108, such as guaranteed loan funds, Emergency Shelter Grants (ESG), HOME Investment Partnerships (HOME), and Housing Opportunities for Persons With Aids (HOPWA).

The consolidated plan is typically a five-year strategic plan to address unmet public service and housing needs of low-income persons and families within the City. For each of the five years, an annual action plan is developed in preparation for the subsequent grant year which identifies specific activities, goals and funding allocations.

Environmental Reviews

The City maintains a written record of the environmental review undertaken for every project or program receiving federal funds from HUD. This environmental review record is available for public inspection. Certain projects require publication of specific actions or findings, which include a description of the activity, its location, and identification of any measures required to mitigate potentially significant adverse effects. Public comment periods are included in the review process as prescribed by NEPA and 24 CFR Part 58.

Citizen Participation for Section 108 Loan Guarantee Program

In accordance with Section 108 regulations, Subpart M-Loan Guarantees, 24 CFR 570.704, the City will comply with the following pre-submission and citizen participation requirements before submitting an application for Section 108 loan guarantee assistance to HUD. These requirements will also apply to the submission of an Economic Development Initiative (EDI), and Brownfield Economic Development Initiative (BEDI) application.

- The City will develop a proposed application to include the community development objectives and activities the City proposes to pursue and carry out with the Section 108 funds. Each activity will be described in sufficient detail, including the provision under which the project is eligible, the national objective it meets, the amount of funds expected to be used, and the activity's location to allow citizens to determine the degree to which they will be affected. The proposed application will also indicate which activities will generate program income and where citizens may obtain additional information about proposed activities. The proposed application will also include a description of the pledge of grants required under 24 CFR 570.705(b)(2).
- The City will also publish a public notice which will include its proposed application so as to give affected citizens an opportunity to examine the application's contents and to make comments. The public notice will also advise citizens on how and where to submit comments as well as notify citizens of when and where a public hearing will be held at which they can provide further input on the proposed application. The public notice will be published at least 30 calendar days in advance of the public hearing.
- A minimum of two (2) public hearings, held at different stages of the Consolidated Plan citizen participation process, will be held for the purpose of obtaining the views of citizens and formulating or responding to proposals and questions. At least one of these hearings will be held before submission of a Section 108 application to HUD to obtain the views of citizens on community development and housing needs. At the hearing, each activity will be described in sufficient detail including: the provision under which the project is eligible, the national objective to be met, the amount of funds expected to be used, and the activity's location so that citizens can determine the degree to which they will be affected. Citizens will have up to 30 calendar days and including the day of the public hearing to comment.
- Once the City has published the public notice and held the public hearing, the City will determine if the proposed application needs to be modified, based on comments and views received, before submitting the application to HUD. Upon completion, the final application will be made available to the public at the City Clerk's office.

Assessment of Fair Housing Plan/Analysis of Impediments Revisions and Administrative Updates (AFH/AI)

The City shall provide community residents with reasonable notice and an opportunity to comment on revisions to the AFH/AI, as specified under 24 CFR 5.164.

The City has determined that an AFH/AI revision is necessary when:

- The material change in circumstances affects the information on which the AFH/AI is based;
- The analysis, fair housing contributing factors, or the priorities and goals of the AFH/AI no longer reflect actual circumstances.

The City will provide affected citizens a period of not less than 30 calendar days to make comments on a significant AFH/AI revision before it is implemented. Acceptable methods of meeting the citizen participation requirements include:

- Publication of the availability of the substantial change(s) in a local newspaper. The publication will provide a link to a City Housing Department web page which will provide more detailed information on the significant revision(s) and how to provide comments.
- Publication of any proposed change shall appear in a local newspaper whose primary circulation is within the area serving the community of affected citizens;
- Advertisement of the availability of the proposed change on the City's website;
- Posting notices in public buildings within the City, which include, but are not limited to, public libraries; or
- Holding meetings with citizens' advisory groups within the area affected by the significant revision.

Notification to the public shall advise citizens of how and where to submit comments on the proposed changes. A summary of these comments, and a summary of comments not accepted and the reasons therefore, shall be attached to the significant revision that is submitted to HUD.

Access to Meetings for Persons with Disabilities and Non-English Speaking Persons

The Citizen Participation Plan shall provide for and encourage participation by all citizens, including minorities, non-English speaking persons, and persons with mobility, visual, or hearing impairments. Persons with disabilities needing special assistance to participate in the meetings shall contact the City Clerk's Office at least 72 hours prior to the meeting to mobility, visual or hearing impairments shall be accommodated.

To accommodate non-English speaking persons, a translator shall be provided at each hearing and other translators may be made available upon request with at least three business days' notice. Requests can be made by email or telephone to Housing Department, Grants Management Division.

Public Outreach and Access

The consolidated plan and annual action plan development processes shall include consultation with organizations that provide community services, public and private organizations, community

based organizations, faith based organizations, philanthropic organizations, businesses and developers.

Commencing with consolidated plans submitted on or after January 1, 2018, consultations must occur with broadband internet service providers, organizations engaged in narrowing the digital divide, agencies that manage flood prone areas, public land or water resources, and emergency management agencies.

Citizens are encouraged to participate in an advisory role in the planning, implementation, and assessment of the projects recommended under the plan(s).

Notices of public hearings meetings will be sent to members of the Inter-Neighborhood Council Committee (INCC), the presidents of the public housing tenant advisory councils.

Funding Recommendations

Prior to the adoption of the Consolidated Plan and/or Annual Action Plan by the City Council, the following information shall be made available to citizens, public agencies and other interested parties:

- Grant funds that will be available or anticipated to be available for the proposed plan (including program income).
- Range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income.

A summary of the proposed Consolidated Plan and/or Annual Action Plan shall be published in at least one newspaper of countywide circulation and the announcement may also appear in at least one Spanish language newspaper of general circulation. Public service announcements may also be provided for local radio stations. The summary shall describe the plans and purpose of the plan(s) and include a list of the locations where copies of the entire plan(s) may be examined. As a minimum, digital or hard copies of the proposed plan(s) shall be available for public review at the main Oxnard Public Library, City Clerk's Office and the City's Housing Department offices on 435 South D St., Oxnard, CA.

The Consolidated Plan and/or Annual Action Plan and the Activities to be funded shall be made available on the City's Housing Department, Grants Management web page.

The Consolidated Plan and/or Annual Action Plan shall be made available for public comments for a minimum of 30 days prior to submission to HUD.

Written comments can be mailed to Grants Manager, City of Oxnard Housing Department, 435 South D Street, Oxnard, CA 93030 or emailed to grantsmanagement@oxnard.org.

Displacement of Persons

The Citizen Participation Plan must, as required by 24 CFR Part 91, Section 91.105, "set forth the jurisdiction's plans to minimize displacement of persons and to assist any persons displaced...."

The City will pursue projects which promote affordable housing, i.e., new construction and rehabilitation, which will not dislocate persons or families. (Some temporary relocation may be required for rehabilitation projects). If permanent relocation is necessary (due to the acquisition of an occupied residence planned for major reconstruction or demolition, etc.), the City will comply with the Uniform Relocation and Real Property Acquisition Policies Act of 1970 as amended, which establishes types and levels of assistance required depending upon the circumstances. Certification of compliance is included in the City of Oxnard Consolidated Plan.

The City has on file its Residential Anti-displacement and Relocation Assistance Plan as required under Section 104(d) of the Housing and Community Development Act of 1974, as amended, which pertains to any activity assisted with funding under the CDBG, ESG or HOME programs.

Public Hearings

The public hearings will be held at City of Oxnard Council Chambers and/or in facilities in or adjacent to low/moderate income neighborhoods. Public hearings may be scheduled during the evening to ensure the maximum attendance by residents.

The City shall hold a minimum of two public hearings per plan year (fiscal year). The purpose of the hearings is to obtain public comments, to address housing and community development needs, and to outline the development of proposed activities, to address the unmet needs of low-and moderate-income persons regarding housing, community and economic development and public services.

The first hearing may be held in facilities in or adjacent to low/moderate income neighborhoods or City Council Chambers. The purpose of this initial hearing is to obtain the public comments on housing and community development needs, including priority non-housing community development needs. This meeting is mandatory for all applicants recommended for funding.

An optional public hearing may be held to solicit public comment on activities which could be implemented to address the unmet needs identified at the first public hearing but prior to the

adoption of the proposed plan by the City Council. The purpose of this hearing is to obtain citizens' comments on proposed activities and funding allocations.

The final public hearing will be held to obtain citizens' comments on proposed activities and to present the Consolidated Plan and/or the Annual Action Plan to the City Council for adoption. The final hearing shall be held in the City Council Chambers.

The hearings shall be announced in at least one newspaper of general circulation in English. The announcement will also appear in at least one Spanish language newspaper of general circulation. The hearings may also be announced as a public announcement on radio stations as appropriate and announced through an informational flyer distributed/posted by Housing Authorities, public service and other organizations. At least one Spanish language radio station may be informed and the flyer may be prepared in Spanish. The announcement for the public hearings will also be e-mailed, or mailed upon request to the current list of HUD partners, sub-recipients and other interested parties in the City of Oxnard.

Technical Assistance

The City shall provide, upon request, technical assistance to organizations and individuals representative of low- and moderate-income residents wishing to develop proposals for funding assistance under any of the programs covered by the Consolidated Plan. The City shall determine the level and type of assistance consistent with HUD policies and questions.

Amendments to the Plan

The City shall amend its approved Consolidated Plan and/or Annual Action Plan if:

- A change in its allocation priorities or a change in the method of distribution of funds occurs;
- A decision to carry out an activity using funds not previously described in an action plan covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD); or
- A change in the purpose, scope, location, or beneficiaries of an activity occurs.

Amendments will be considered substantial changes and require official action if;

- Grant funds are allocated to a new activity for the first time;
- A funding increase in a current activity, or a change in the use of funding from one eligible activity to another, of more than \$100,000 in CDBG or HOME funding, or more \$30,000 in ESG funding; or if,
- A funded activity is cancelled during the program year.

Changes which are less than substantial are changes which represent less than the amounts listed above, and which do not have a significant impact on the project's purpose, scope, location, or beneficiaries. If an activity is not funded in the current year, but is the same or similar to an activity funded in another program year, and the addition is less than amounts above, and there is no significant change in the project (purpose, scope, location, or beneficiaries), it is not considered a substantial change. The authorized City official may approve changes which are less than substantial.

Reallocation of funding among program years is not considered a substantial change.

Program income will be allocated consistent with the Annual Action Plan and with HUD requirements. If program income is greater or less than the approved annual amount it will be cause for an amendment or an increase to funds available in subsequent year.

The City must submit a copy of each amendment to HUD. HUD allows amendments as they occur or at the end of the program year. Letters transmitting copies of amendments must be signed by the official representative of the City authorized to take such action.

Substantial amendments of the Consolidated Plan or Annual Action Plan will require a Public Hearing and City Council approval. Notice of public hearing will be posted on City's Housing Department, Grants Management Division webpage and noticed in a newspaper of general circulation a minimum of 30 days prior to implementation. A public hearing will be held to obtain citizens' comments on the proposed substantial amendment and to present the substantial amendment to the City Council for adoption.

Consolidated Annual Performance and Evaluation Report (CAPER)

The City will prepare the CAPER as required at the close of the grant year which shall be made available for public comment for a minimum of 15 days prior to submission to HUD.

Public comments will be considered and responded to as appropriate with a summary of the comments attached to the CAPER for submittal to HUD.

Availability of Documents

The Consolidated Plan, Annual Action Plans, substantial amendments, CAPER and the Citizen Participation Plan will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request.

The Consolidated Plan, Annual Action Plans, CAPER, the Citizen Participation Plan and the Uniform Relocation and Real Property Acquisition Policies Act of 1970 as amended, will be available for review at the City of Oxnard Housing Department, 435 South D Street, Oxnard, CA during working hours.

Citizen Participation Coordinator

The Citizen Participation Coordinator shall be a member of Grants Management Division staff in the Housing Department of the City of Oxnard.

The Citizen Participation Coordinator shall make past and present programmatic and funding information available to citizens during all phases of the HUD Community Planning and Development Program cycle, upon request.

Comments and Complaints

The City shall consider all verbal or written comments or views of citizens received at the public hearings in preparing the final Consolidated Plan, Annual Action Plans, amendments to these plans, Section 108 Loan applications, CAPER or the Citizen Participation Plan.

A summary of these comments or views shall be attached to the final Consolidated Plan, amendment to the Plan, CAPER or Citizen Participation Plan and submitted to HUD as appropriate.

The City shall respond in a timely manner, within 15 days where practical, to all written complaints, grievances and requests for information about the Consolidated Plan.

Written comments, complaints and/or grievances can be submitted to Housing Director, City of Oxnard Housing Department, 435 South D Street, Oxnard, CA 93030.

Contingency Plan in the Event of an Emergency/Disaster

In the event of an emergency or disaster that presents a serious and immediate threat to the health and welfare of the citizens of the City, the noticing requirements for public hearings shall be reduced to ten calendar days.

Reprogramming of funds in the event of such an emergency will require approval by the City Council when they are in session or ratification of the reallocation when the City of Council is in recess.

CITY OF OXNARD
CITIZEN PARTICIPATION PLAN – Addendum
FOR THE 2020 CARES ACT FUNDS, FLEXIBILITIES AND WAIVERS

A. POLICY STATEMENT

1. This Citizen Participation Plan Addendum specifically addresses the special policies and guidelines in support of addressing the impacts of COVID-19 through the use of Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Act (HOME) programs, and the 2020 CARES Act Funds, termed CDBG-CV and ESG-CV.
2. All policies and processes described in the City of Oxnard (hereinafter referred to as “City”) Citizen Participation Plan, amended on July 10, 2018, is applicable to all CDBG, ESG and HOME funding sources unless specified in this Addendum.
3. All policies and processes specified in this Addendum are applicable through the adoption date of this Addendum and will expire upon the date specified for the CARES Act of 2020 funding and waivers, by the United States Department of Housing and Urban Development (HUD) department.

B. DEFINITIONS

1. CARES Act Flexibilities and Waivers – HUD Secretary issued statutory and regulatory waivers/alternative requirements for CDBG-CV, ESG-CV and some CDBG, HOME and ESG funds when necessary to expedite or facilitate the use of grant funds to prevent, prepare for, and respond to coronavirus. Prohibits waivers/alternative requirements related to fair housing, nondiscrimination, labor standards, and the environment. (see Appendix A: CARES ACT HUD Waivers Applicable to Citizen Participation Plan)
2. CDBG-CV – Community Development Block Grant funding specifically allocated for the impacts related to COVID-19
3. ESG-CV – Emergency Solutions Grant funding specifically allocated for the impacts related to COVID-19

C. PLANNING PROCESS FOR CONSOLIDATED PLAN DOCUMENTS

1. Public Review and Comment – Documents (Plans) created for the CARES Act of 2020 funds and waivers will be made available to the public for no less than 5 calendar days. Written comments will be accepted during the public comment period. Summaries of comments will be attached to documents requiring public reviews and input.

D. MEETINGS AND HEARINGS

1. During locally, state, or federally declared Stay-At-Home orders, public meetings may occur virtually and will publicly post meeting dates, times, and instructions in advance of the meetings.

Citizen Participation Plan (CPP) Procedural History

1. Originally adopted CPP by City Council on October 18, 1994
2. Modifications to CPP adopted by City Council on July 25, 2000
3. Amended CPP adopted by City Council on July 10, 2018
4. CARES Act Addendum approved by City Council on October 6, 2020

Appendix A
CARES ACT
HUD Waivers
Applicable to Citizen Participation Plan

CARES ACT HUD Waivers Applicable to Citizen Participation Plan

CONSOLIDATED PLAN REQUIREMENTS

1. Citizen Participation Public Comment Period for Consolidated Plan Amendment

Requirement:	30-day Public Comment Period.
Citations:	24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401
Explanation:	A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.
Justification:	Given the need to expedite actions to respond to COVID-19, HUD waives 24 CFR 91.105(c)(2) and (k), 91.115(c)(2) and (i) as specified below, in order to balance the need to respond quickly to the growing spread and effects of COVID-19 with the statutory requirement to provide reasonable notice and opportunity for citizens to comment on substantial amendments concerning the proposed uses of CDBG, HOME, HTF, HOPWA or ESG funds.
Applicability:	This 30-day minimum for the required public comment period is waived for substantial amendments, provided that no less than 5 days are provided for public comments on each substantial amendment. The waiver is available through the end of the recipient's 2020 program year. Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan.

2. Citizen Participation Reasonable Notice and Opportunity to Comment

Requirement:	Reasonable Notice and Opportunity to Comment.
Citations:	24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401
Explanation:	As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to

provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

Justification: HUD recognizes the efforts to contain COVID-19 require limiting public gatherings, such as those often used to obtain citizen participation, and that there is a need to respond quickly to the growing spread and effects of COVID-19. Therefore, HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 as specified below to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances.

Applicability: This authority is in effect through the end of the 2020 program year.

Fiscal Year 2023-24 Annual Action Plan – Public Hearing



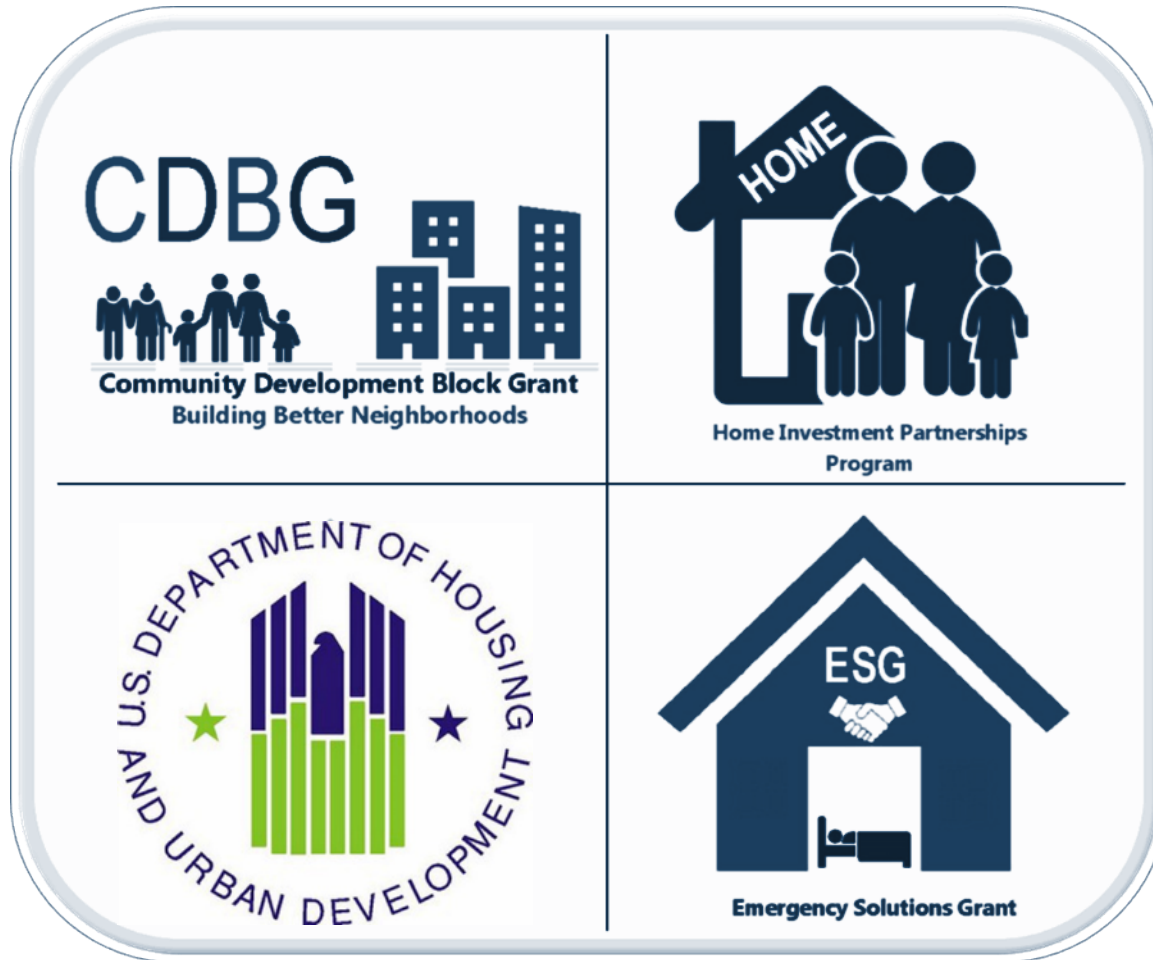
Emilio Ramirez, Housing Director
Housing Department

Community Services, Public Safety, Housing & Development Committee
February 14, 2022

1. The City of Oxnard annually receives CDBG, HOME, and ESG (entitlement grants) funding from the United States Department of Housing
2. Grants must have an approved Consolidated Plan that establishes the goals and objectives for five years
3. Annual Action Plans are required each year before entitlement grant funds are disbursed
4. Staff anticipates grant awards within 5% margin of the previous award received, which was a combined \$3,432,257
5. Outreach for input from residents and stakeholders required



241 West 2nd Street. Rendering via City of Oxnard.



CDBG provides funding for multiple activities such as:

PUBLIC SERVICES



HOUSING REHABILITATION



Colonia Park

INFRASTRUCTURE AND FACILITIES IMPROVEMENTS



HOME investments must result in permanent housing for low-income residents in the form of:

1. Down Payment Assistance
2. Rehabilitation
3. New Construction
4. Acquisition



Ormond Beach Villas - Oxnard, CA



HOMELESS SERVICES



Outreach & Shelter Operations



Rental Assistance



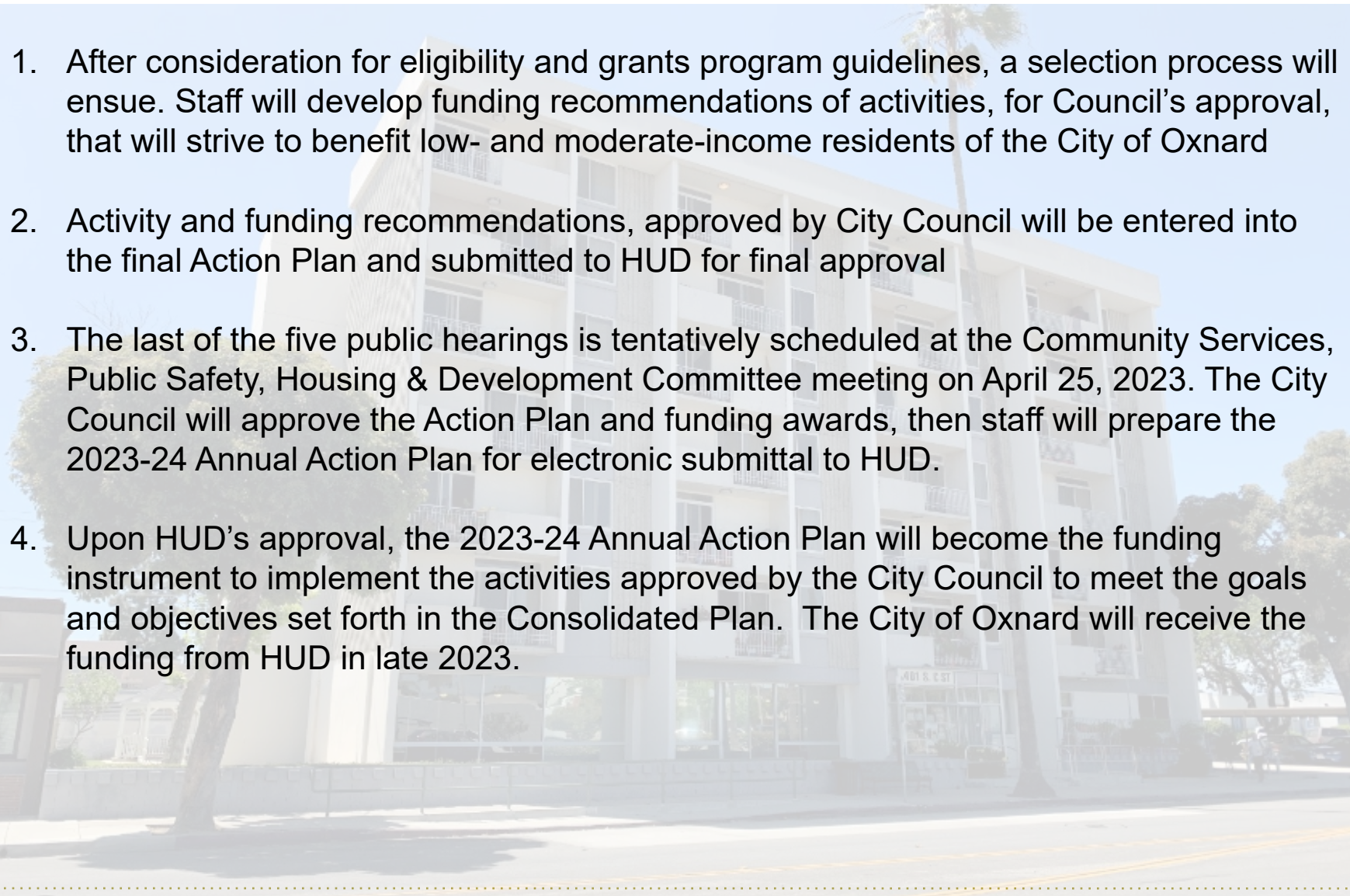
Case Management



1. The Annual Action Plan identifies specific activities, goals and funding allocations for each program year
2. HUD requires opportunities for the public to participate in the development of the Annual Action Plans and to receive comments relating to the unmet needs of low- and moderate-income persons residing in the City of Oxnard
3. HUD requires two public hearings, annually. Five public hearings were scheduled to ensure maximum participation was met, a survey was provided, and bilingual publications and translation services available
4. Publications and presentations included the projected amount of funds (within a 5% margin) for each program. They are as follows:
 - a. CDBG - \$2,365,280
 - b. HOME - \$855,503
 - c. ESG - \$211,474

Ormond Beach Villas – Oxnard, CA

1. The public has been encouraged to provide their input on community needs via a Resident Input of Community Need survey.
2. The Community Meetings schedule and Surveys are located on the Oxnard Housing Department, Grants Management website in English and in Spanish:
<https://www.oxnard.org/city-department/housing/grants-management/>
3. A Notice of Funding Availability (NOFA) announcing the availability of Fiscal Year 2023-24 Entitlement Grant funding in January of 2023. The NOFA invites non-profit providers to apply for a portion of the City's CDBG, HOME, or HESG funding for an activity or service that primarily benefits low- and moderate-income persons.
4. Mandatory workshops for non-profit providers were held on January 18, 2023 and February 1, 2023 to aid with the CDBG and ESG application process.

- 
1. After consideration for eligibility and grants program guidelines, a selection process will ensue. Staff will develop funding recommendations of activities, for Council's approval, that will strive to benefit low- and moderate-income residents of the City of Oxnard
 2. Activity and funding recommendations, approved by City Council will be entered into the final Action Plan and submitted to HUD for final approval
 3. The last of the five public hearings is tentatively scheduled at the Community Services, Public Safety, Housing & Development Committee meeting on April 25, 2023. The City Council will approve the Action Plan and funding awards, then staff will prepare the 2023-24 Annual Action Plan for electronic submittal to HUD.
 4. Upon HUD's approval, the 2023-24 Annual Action Plan will become the funding instrument to implement the activities approved by the City Council to meet the goals and objectives set forth in the Consolidated Plan. The City of Oxnard will receive the funding from HUD in late 2023.

That the Community Services, Public Safety, Housing & Development Committee conduct a public hearing to receive comments from the public relating to the unmet needs of low- and moderate-income persons residing in the City of Oxnard, for affordable housing, community and economic development, public services and homelessness for the preparation of the FY 2023-24 Annual Action Plan.





QUESTIONS?

Written comments to:

emilio.ramirez@oxnard.org or albert.ramirez@oxnard.org