

**COMMENT OF SARAH OWENS ON THE ANNUAL ACTION PLAN PROPOSED  
PURSUANT TO 24 CFR 92.220**

This comment concerns the the draft 2019 Annual Action Plan (The Plan), prepared for the City of Salem and issued April 19, 2019.

**AP-10 1.**

The Plan states, “An issue brief was prepared to examine policy questions relating to whether or not the region should withdraw from the ROCC and re-establish its own CoC. The results of this research and recommendations will be presented to the Salem City Council at a work session scheduled for April 22, 2019. The City of Keizer will also review this policy question.”

The issue brief was prepared for the Mid-Willamette Homeless Initiative Steering Committee, which on March 28, 2019 voted “To recommend forming a Marion and Polk County Continuum of Care with the possibility of including Yamhill County, if mutually beneficial.” (Minutes March 28, 2019 Meeting). On April 24, the Polk County Board of Commissioners passed a resolution in support of forming a regional CoC, with the City of Keizer following suit on May 6, 2019. A similar resolution is set to go before the Marion County Board of Commissioners on May 22, 2019 and the Salem City Council on June 10. Both are expected to pass.

The Plan states that “MWVCAA...coordinates the local CoC effort for Marion and Polk counties through the Marion and Polk Counties Plan to End Homelessness” (page 10) The “Marion and Polk Counties Plan to End Homelessness” (<https://www.co.marion.or.us/BOC/MWHI/Documents/Marion%20and%20Polk%2010%20Year%20Plan%20to%20End%20Homelessness-%20Full%20Plan.pdf>) was created in 2008. Asked by email whether MWVCAA was working on this plan, its Executive Director wrote, “No. The only 10 year plan we had was the one from 2007 or 2008. I looked at it once.”

The Plan states, “To that end street outreach, expansion of the day resource center and homelessness prevention and rapid rehousing, emergency shelter facilities, warming center network and coordinated entry assessments that the jurisdiction worked with MWVCAA to develop standards, policies and procedures.” The sentence lacks meaning and appears to be missing words.

Response: As noted, the AAP was completed and issued for public review on April 19, 2019. The CoC actions referenced in the comment occurred after the AAP was presented. Subsequent to submitting the AAP to HUD additional actions will materialize.

**AP-10 2.**

The Plan states, “The 2015-2019 ConPlan will steer community housing, and economic development programs to ensure that homeless persons recover, and acquire necessary support services that ensure self-sufficiency. This will be achieved by implementing the CoC's 10-Year Plan to End Chronic Homelessness. The objectives of the CoC 10-Year Plan to End Chronic Homelessness include: Create new permanent housing beds for the chronically homeless (60 beds in 10 years); increase the percentage of homeless persons staying in permanent housing over six months to at least 71 percent (increase from 80 percent to 85 percent); increase the percentage of homeless persons moving from transitional housing to permanent housing; increase the percentage of homeless persons employed at completion of the self-sufficiency program (from 33 to 40 percent); decrease the number of homeless households with children (from 292 to at most 155)” (page 18). Asked by email about the “CoC 10-Year Plan to End Chronic Homelessness, MWVCAA’s Executive Director replied, “I’ve never heard of the ‘COC’s 10 year plan to end chronic homelessness.’ I am keeping track (to some degree anyway) of what we have bed wise. But until we have central planning it’s really moot because the bed stock can’t be used in a systemic way.” If the Plan includes the measures quoted above, it should also include base lines (e.g., 10 years beginning when, and the baseline of “chronically homeless beds”) and identify how, by whom, and how often they are to be reported.

Response: The City in conjunction with applicable provider partners remain committed to capturing data to establish benchmarks. MWVCAA is a partner agency in these ongoing efforts.

**AP-20****Goals Summary Information**

The \$270K HOME grant to Salem Housing Authority for security deposits is counted twice, once under “subsistence payments” (p 28) and again under “TBRA and transitional housing” (p 29).

Response: The comment is appreciated. Some revisions have been made in the AAP.

**AP-38**

The \$270K HOME grant to Salem Housing Authority for security deposits is counted under “subsistence payments” (see AP-20), and the total “TBRA and transitional housing” is \$670,000 (should *either* be \$473,354 OR \$743,353 [\$473,354 TBRA + \$270,000 sec. deposits]. See <https://www.cityofsalem.net/citydocuments/federal-programs-funding-recommendations-2019-2020.pdf>

Response: The comment is appreciated. Some revisions have been made in the AAP.

End.



**COMMUNITY ACTION**

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**HELPING PEOPLE  
EXIT POVERTY**

May 13, 2019

City of Salem  
Urban Development Department  
350 Commercial St.  
Salem, OR 97301

City of Salem – Grants Panel,

Mid-Willamette Valley Community Action Agency (MWVCAA) has been notified that the City of Salem has remaining HOME funds for the fiscal year July 1, 2019 – June 30, 2020. In light of this, MWVCAA – The ARCHES Project would like to formally request an allocation of HOME for tenant based rental assistance (TBRA).

MWVCAA is uniquely positioned to distribute HOME funds through a Rapid Re-Housing (RRH) model. Currently, MWVCAA operates a RRH program that is financially supported through the local Continuum of Care. Unfortunately, this funding source will conclude on June 30, 2019; resulting in a \$280,000 decline of available rental assistance for the community. This deficit will create housing instability for 30 program households and prevents the onboarding of additional unsheltered individuals and families into the next fiscal year.

However, this funding closure is an opportunity for the City of Salem. One where HOME funds can be integrated into a pre-established and credible RRH program. By merging HOME funds with The ARCHES project a mutually beneficial program can be crafted; one where expedited spend-down will be a priority, while also maintaining a vital housing pathway for Salem's unsheltered population.

Moving forward, MWVCAA can commit to supplementing HOME TBRA with state funds. This source will be used for client barrier removal (i.e IDs, birth certificates, tenant education), as well as retaining 3.5 FTE. These staff members are experienced in grant spend down, ensuring successful housing placement, while also focusing on client sustainability through self-sufficiency based case management.

MWVCAA looks forward to the opportunity to partner with the City of Salem for the provision of HOME TBRA. An arrangement which will further ARCHES' mission of reducing homelessness in Salem, Oregon. If there are any further questions please contact The ARCHES Project of MWVCAA.

Respectfully,

Ashley Hamilton  
Associate Program Director  
The ARCHES Project  
Mid-Willamette Valley Community Action Agency  
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Creating affordable housing and healthy communities

May 14, 2019

City of Salem  
Urban Development Department  
City Council  
350 Commercial Street NE  
Salem, OR 97301

Re: Public Comment for draft Annual Action Plan HOME funds

To Whom It May Concern,

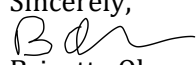
Demand for decent, affordable housing for farmworkers in Salem, and Polk and Marion Counties, far exceeds the supply. Nueva Luz is a proposed 31 unit affordable housing complex for year-round agricultural workers and their families, in West Salem, Oregon. In 2018, WNHS requested \$650,000 and was awarded \$485,530 in HOME funds for this project. WNHS respectfully is requesting additional support. We did not apply for these additional funds during the last HOME application, because WNHS had submitted an application to OHCS earlier this year that, if awarded, would have fully-funded this project. The application scored well, but all urban LIFT funding went to a single project, leaving Nueva Luz with a continued funding gap. We have committed resources from USDA Rural Development that we may lose if we're unable to find a timely path forward; time is of the essence.

Willamette Neighborhood Housing Services (WNHS) would like to request additional financial support to help fill the development gap for Nueva Luz:

- A new allocation of HOME CHDO set-aside funds for the development of Nueva Luz in the amount of **\$150,000**.
- A total of **\$60,000** of CHDO operating funds from 2019 and 2018 for Nueva Luz development (\$30,000 previously awarded in 2018 that we would redirect from operating support to capital support, and a new allocation of \$30,000 for 2019).
- **Additional available HOME funds from the City of Salem**, beyond the CHDO funding referenced above, to help develop this important housing.

WNHS remains committed to developing affordable housing in Salem and has a meeting scheduled with OHCS leadership in late May to discuss other funding opportunities to fill the development gap. These additional commitments from the City of Salem would help fill the current \$1.2 million gap; we are hopeful that we can bridge the remaining gap with help from the state. Nueva Luz will add much needed workforce housing to the limited supply of affordable, quality housing in Polk and Marion Counties.

Thank you for your consideration.

Sincerely,  
  
Brigetta Olson, COO