

## Appendix 1 to AP-12: Public Comments

Public Comments and Responses  
 2017 Annual Action Plan  
 Public Hearing, December 8, 2016  
 HASCO Resident Advisory Board Meeting, January 4, 2017  
 30-Day Public Comment Period  
 March 15, 2017 through April 14, 2017

#	Comment	Response
<b>1</b>	<p>Mr. Mark Smith, Housing Consortium of Everett and Snohomish County, provided some suggestions for enhancements to the 2015 CAPER. He commented that it may be useful to explain in the narrative why no housing units were completed during the program year so that people can understand that there are units in the pipeline being developed but were just not completed this year. He also commented that it would be helpful to include an Appendix to the CAPER which provided additional information on housing project status and the total units under development.</p> <p>Mr. Smith introduced himself as Executive Director of the Housing Consortium of Everett and Snohomish County, an organization that advocates for affordable housing and includes in its membership private non-profit affordable housing developers and other organizations. He thanked Housing and Community Services staff for all the work they do and recognized that a lot of work goes on behind the scenes and that staff work with uncertainty in the amount of funding that will be allocated to programs each year. Mr. Smith stated that the vast majority of funding is used for vouchers, homeless assistance, and services. He acknowledged that the community is needful of these services and hopes these services continue. He commented that a shift needs to happen. He stated that there has been a change in the real estate market, the Snohomish County vacancy rate is 2%, rental evictions are</p>	<p>The County appreciates the comments provided by Mr. Smith.</p> <p>The Consolidated Annual Performance and Evaluation Report (CAPER) is an annual report which evaluates performance under the Consortium’s CDBG, HOME, and ESG programs. The 2015 CAPER was the first report in a new reporting format required by HUD. The report presents information in a more streamlined format than past reports and provides a more direct linkage to the five-year Consolidated Plan and Annual Action Plans and the grant-funded projects under these plans. For capital rental housing projects, the report includes the number of grant-assisted units completed and placed on-line during the program year, but does not include the number of grant-assisted units under development or the total number of units in these projects. The 2015 CAPER performance narrative did briefly reference that additional projects were underway and would be completed in future years. The County agrees that it would be beneficial to add the following information to this narrative in future years: 1) for grant-assisted rental housing capital projects completed during the year, the total number of units completed in the project (the number of grant-assisted units is already reported) and 2) for grant-assisted rental housing capital projects underway, the number of grant-assisted units and total units in these projects that are underway. County HSD staff will also conduct follow-up with Mr. Smith to clarify what additional information he would find helpful and whether it is feasible to add this information to this report or to provide it in another format.</p>

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	<p>going up, and he is hearing from his member organizations that vouchers are no longer keeping up with commercial rents. In addition, he stated that many housing complexes in Snohomish County are being bought up and the new owners are doing minor rehab and then re-renting the units at market rate. He indicated that low-income households at 30% or 50% of the area median income, and many households at 60% of the area median income, cannot afford market rents. He stated that rents have increased 20 to 30% in the space of a few months and vouchers cannot keep pace with these increases. Mr. Smith commented that we need new affordable units built in order to increase the supply of affordable housing available.</p> <p>Mr. Smith further commented that housing developers work with uncertainty when it comes to funding the development and construction of new affordable units. He stated that the development pipeline is long and many housing developers put in their own funds. He stated they want certainty that funds will be available each year for new affordable units.</p> <p>Mr. Smith explained that the tax credit program is anticipated to change its policy to reduce the amount of local contribution needed to receive points in this category from \$600,000 to \$300,000 and stated that Housing &amp; Community Services staff was instrumental in helping to get this reduction. In terms of getting points in this category, he stated it would be helpful if there was a way to move toward having a certain amount allocated each year to new capital construction. He stated that projects have done poorly in the past in competing for available funds because there has been a decrease in affordable housing developers in the county – for example Senior Services and Compass Health. He stated that there is a need to rely on King County organizations, but without a pot of local money cannot compete. He stated there is some talk about allocating a specific amount of funding each year through the Housing Trust Fund (HTF) application process for smaller (25 units or less) projects. He stated that housing developers typically</p>	<p>Consistent with the assessment conducted for the Consortium’s 2015-2019 Consolidated Plan and the continuing pressures in the housing market since that time, the County agrees that there continues to be a high need in our community to develop new affordable housing units. The County also agrees that the Housing &amp; Community Services Division (HCS) within its Human Services Department administers many sources of federal, state, and local funds, a large portion of which is used to provide rent assistance and services to homeless persons, but notes that specific use of the grant funds are guided by the grant requirements themselves. In addition, the majority of CDBG, HOME, and ESG funds are programmed to support capital housing, public facility, and infrastructure needs, with a smaller percentage used to provide services and rental assistance through security and utility deposits.</p> <p>The County acknowledges there is a multi-year development process for affordable housing capital projects and understands the need to provide certainty, to the extent feasible, in funding estimated to be available for these types of projects. The County and Consortium, through its planning and funding processes, has strived to provide as much certainty as is feasible.</p> <p>The 2015-2019 Consolidated Plan includes the estimated amount of funding to be available over the five-year period, broken down by five-year estimates for each goal identified, and also provides details of the overall annual allocation plan percentages for these funds. This level of programming is intended to provide transparency and a level of certainty as to how the estimated funding will be utilized.</p> <p>The goals and allocation priorities in the 2015-2019 Consolidated Plan are based on the highest priority needs identified through the planning process, the eligible uses of grant funds and other requirements, and the projected funds to be available. However, the actual amount of funds available is determined annually by the federal government through its budget and appropriation process, which creates some unavoidable uncertainty in the process.</p> <p>The rental housing capital goal in the 2015-2019 Consolidated Plan is allocated the largest percentage of funding of all the</p>

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	<p>state that the sweet spot is 50 units, but if new rules go into effect may be new opportunities.</p> <p>Mr. Smith requested that we put our heads together and see if there is a process by which can create some certainty in the dollar amount each year that will be available for new construction. He stated the Mental Health/Sales Tax Fund Board has committed to making an amount available per year (currently \$750,000) for capital construction of new affordable housing units targeted to person with chemical addictions and/or mental health challenges. If there was also certainty in funding amount with these funds, could possibly tie this funding to, or combine this funding with, the Mental Health/Sales Tax funds to know how much funding is available for new construction. Without this, lose in-house development capacity.</p>	<p>goals and supports the long-term goal of both preserving or maintaining existing units of affordable rental housing and creating new units of affordable rental housing, both of which were identified as high priority needs. This goal is intended to provide affordable housing developers a wide range of strategies to achieve this goal, which for the creation of new units may include either acquisition/rehabilitation or new construction. It also allows necessarily flexibility in the use of funds from year to year, depending on the type of applications received and the strength of the applications. Both types of applications may apply for funding each year.</p> <p>The County notes that project applications for the new construction of rental housing have been very successful in this application process for 2015 and 2016 awards and for 2017 funding recommendations.</p> <p>While the County believes the existing planning and application processes continue to provide the level of certainty feasible for rental housing capital projects involving new construction, County staff welcomes and will conduct additional conversation with the affordable housing development community in the upcoming year regarding possible proposals for consideration.</p> <p>To improve coordination of funding available for affordable housing, the County combined the 2018 HOME funding with the County's Chemical Dependency and Mental Health Sales Tax funding into one Notice of Funding Availability (NOFA).</p> <p>On April 4, 2017 the County participated in a meeting with the Housing Consortium of Everett &amp; Snohomish County to discuss the role of local funders and developers in establishing a pipeline of future project to better compete for Tax Credit and Housing Trust fund funding.</p>
2	<p>Ms. Galina Volchkova, Volunteers of America Western Washington, stated that she works at the Dispute Resolution Center and assists people who have eviction notices or 3-day pay or vacate notices commented that many of the people she sees are spending 80 to 85% of their income for rent and cannot afford the increasing move-in costs (first and</p>	<p>The County appreciates the comment provided. The County acknowledges the significant challenges that low-income individuals and families face in the current rental housing market. The County also acknowledges the need to provide some immediate rental housing assistance for homeless and at-risk persons, some of the lowest income and most vulnerable residents of our community, with the funding</p>

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	<p>last month's rent, and deposits and double deposits in some cases) that landlords are now demanding.</p> <p>She stated that rent makes up most of their income and negotiating with landlords to keep them housed is hard. She indicated that can be successful if can show will help clients with employment and budgeting, but only if the clients are able to increase their income to afford the housing. She indicated they want to help people as much as possible, but people do not have the incomes to pay the amount of rent and it is difficult to find other affordable housing. She noted that if a person is receiving ABD or SSI there is only a small hope that they would be able to increase income.</p> <p>She stated her concern is homeless prevention and how we are going to help the extremely low-income population that is facing homelessness in their daily lives now, while we are working towards increasing affordable housing units for the future. She commented that without funding and intensive support services, it is difficult to negotiate with landlords to keep households at risk of eviction out of homelessness.</p> <p>She stated that she understands that landlords require move-in costs as protection and that many people have a history of evictions or damage in the past, but that low-income households barely make enough to get by and it is unlikely they would be able collect the money needed for move-in costs. She stated that Seattle and King County are considering new policies/laws that would require landlords to accept payment plans for deposits and commented that Snohomish County may also want to considering doing the same here.</p>	<p>available under the 2015-2019 Consolidated Plan, while continuing to support the long-term goal of maintaining existing, and creating new, affordable rental housing units. Consistent with the 2015-2019 Consolidated Plan goals, HOME funds were awarded for the first time in 2016 for a project to provide security and utility deposits to assist homeless and at-risk persons to overcome these barriers in the rental housing market. The County is aware that there are various efforts taking place at state and local levels to address these types of concerns. The County will continue to explore options that may help with the affordable housing struggles Snohomish County residents encounter.</p>

3	<p>Ms. Rachel Wilkinson Downes, Housing Hope, commented that she agreed with other speakers that there is a high need for more affordable housing units in Snohomish County. She also wanted to thank the County for the work they do, and for the support and funding.</p>	<p>The County appreciates the comment provided. The County also acknowledges that there is a high need for more affordable housing units in the County.</p>
4	<p>A HASCO Resident Advisory Board member commented that people need to be able to access information about what resources are available to them. The resident stated that there needs to be a place where people can find information about what resources are available, especially for those who are close to being homeless, the stage where prevention can help. It's huge gap in services. The resident stated that there is also a gap in short-term assistance for people who barely get by and can become homeless as a result of one crisis. The resident explained that people on the edge of homelessness who don't qualify for assistance but need a little bit of help to get resources or to pay a month's rent. The resident further explained that they slide down hill and can't get back up.</p>	<p>The County appreciates the comment provided by the resident. The County acknowledges the significant challenges for people experiencing a housing crisis, and in particular those at risk of homelessness. Residents may access information about resources through the Volunteers of America 2-1-1 community resource line. Additionally, the existing Coordinated Entry system accessed through 2-1-1 assists those that are literally homeless as well as those at risk of homelessness. Individuals at risk of homelessness may receive referrals to Prevention Navigation services; providing assessment and connections to services, including flexible funds to assist with short term needs. Eligible households may also receive more targeted prevention services through the Dispute Resolution Center at the Volunteers of America.</p>
5	<p>The second comment from a HASCO Resident Advisory Board member commented that a barrier for people trying to get ahead is that if you try to get head, go to school and then get better job, your benefits get cut. The resident stated it is like a punishment for doing better. The resident explained that people need a "stability period" before their benefits get cut off. The resident further explained that folks are afraid of losing benefits and therefore are afraid to take a better job or get ahead.</p> <p>The resident also suggested the use of tiny homes to set up a community with rules, that people can live in, like a little community of small houses.</p>	<p>The County appreciates the comment provided by the resident. The County also acknowledges that there are real and perceived barriers to individuals benefits if their income or eligibility status changes. Many of these public benefits are regulated by federal or state laws.</p> <p>The County and local affordable housing developers have explored many different kinds of affordable housing models that exist, including tiny homes. This model, as all models, has both benefits and challenges. The 2015-2019 Consolidated Plan allows for flexibility in the type of affordable housing model proposed, as long as it meets the applicable requirements.</p>
6	<p>One comment was received during the Draft 2017 Annual Action Plan public comment period. Laurel stated she was injured at work and is now disabled and lives in an apartment that is not accessible to her; the cupboards are too high and</p>	<p>The County appreciates the comment provided and acknowledges that there is a need for more accessible affordable housing units in Snohomish County. The 2015 – 2019 Consolidated Plan affordable rental housing goal identifies</p>

	<p>the space is too small to get around in. She commented that those who build affordable housing should consider the need for accessible rental units. She asked if there were any resources that could help her make her unit more accessible.</p>	<p>a priority need to provide accessibility improvements for affordable rental housing units and for increasing the number of affordable housing units for persons with physical and cognitive disabilities. Affordable rental housing projects supported through the Consolidated Plan programs as well as those built in the open market must follow federal requirements for the number and type of accessible units and features and for responding to requests for reasonable accommodations. As a result of public comment in a previous year's action plan, the "Tenant Accessibility Program" program was developed to provide a funding resource for low-income persons who need accessibility improvements in their rental units. Laurel was given the contact information for the TAP program.</p>
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