

Annual Action Plan FY 2024-2025

> Draft April 23, 2024



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# Version History

No.	Summary of Changes			
	Published Draft for Public Comment:	March 22, 2024	Sent to HUD for Approval:	May 15, 2024
1	Conducted Public Hearing:	April 23, 2024	Approved by HUD:	TBD
	Original 2024-2025 Annual A	ction Plan.		

# AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The Town of Apple Valley (Town) has a storied history as a crossroads along the Mojave River. While the area has long been a population center, it was only first incorporated in 1988. In 2000, according to the Decennial Census, the Town was home to 54,175 residents, now it is home to over 70,000. The Town has evolved and experienced significant growth in population and economic activity since incorporation.

The Town and the City of Victorville worked together to form the Apple Valley-Victorville Consortium (Consortium) in 2003. This was a considered strategy enabling the Town and City to access HOME Investment Partnership (HOME) funds and make more affordable housing resources available to residents. The Town serves as the lead agency for coordinating the Consortium's Consolidated Planning process and submission, while the City of Victorville serves as a subrecipient.

Each jurisdiction is responsible for administering its own Community Development Block Grant (CDBG) program, while the Town administers the HOME Program for both jurisdictions. However, HOME objectives and goals are determined by both jurisdictions through an extensive analysis of housing needs for lower income residents, as specified by the program regulations. Each jurisdiction is also responsible for preparing its own Annual Action Plan (AAP) and Consolidated Annual Performance Evaluation Report (CAPER). The Town and Consortium receive CDBG and HOME funds from HUD on a formula basis each year, and in turn, awards grants, and loans to nonprofit, for-profit or public organizations for programs and projects in furtherance of the Five-Year Consolidated Plan. These programs provide for a wide range of eligible activities to address the needs of the Town and Consortium residents.

#### Community Development Block Grant (CDBG)

The Housing and Community Development Act of 1974 created the CDBG Program with three (3) primary objectives against which HUD evaluates the Five-Year Consolidated Plan and the Town's performance. Those primary objectives are decent housing, suitable living environments, and expanded economic opportunities for low- and moderate-income persons. The CDBG regulations require each activity meet one (1) of the following national objectives:

- Benefit low- and moderate-income persons;
- Aid in the prevention or elimination of slums and blight; or
- Meet other community development needs having a particular urgency (usually the result of a natural disaster).

#### HOME Investment Partnerships (HOME)

The Cranston-Gonzalez National Affordable Housing Act of 1990 created the HOME program to expand the supply of affordable housing for low- and moderate-income households. Often used in partnership with local nonprofit housing development organizations, the HOME program can support a wide range of affordable housing activities, including building, buying, and/or rehabilitating rental and ownership housing or providing direct rental assistance to low- and moderate-income people.

# 2024-2025 Program Year

As of the date of the preparation of this document, HUD has not yet released the Town's and Consortium's annual allocations for the CDBG and HOME programs. For this reason, HUD as advised the Town to prepare this draft document utilizing the current annual allocation and include language detailing the methodology by which the Town will reallocate funds should the 2024-2025 annual allocation increase or decrease. During the 2024-2025 Program Year, the Town anticipates receiving \$652,733 of CDBG funds and the Consortium anticipates receiving \$911,188 in HOME funds.

In the event that the Town's and Consortium's 2024-2025 annual allocation should change, a request of the Town Council is being made to provide staff and the public with a methodology for which activity budgets would be adjusted. It is recommended that Town Council adopt the following language for adjusting activity budgets for the CDBG and HOME programs should the Town's and Consortium's 2024-2025 annual allocation change:

#### **CDBG**

- Should the CDBG allocation be higher than \$652,733:
  - o The CDBG Administration budget will be increased to maximize the 20% administration cap allowed under the CDBG program.
  - The Public Service budget will be increased to maximize the 15% public service cap allowed under the CDBG program. Furthermore, the increase shall be proportionally distributed to the following public service activities: Community Health Action Network – Emergency Assistance Program; Feed My Sheep – Feeding Apple Valley; and Ruth and Naomi Project – Sustenance to Services for Seniors.
  - o Balance of additional funds will be allocated to the Residential Rehabilitation Program.
  - Funding levels for all outstanding activities will remain the same as proposed in the 2024-2025 Action Plan.

- Should the CDBG allocation be lower than \$652,733:
  - The CDBG Administration budget will be reduced to be compliant with the 20% administration cap allowed under the CDBG program.
  - The Public Service budget will be reduced to be compliant with the 15% public service cap allowed under the CDBG program. Furthermore, the reduction shall be proportionally deducted from the following public service activities: Community Health Action Network – Emergency Assistance Program; and Feed My Sheep – Feeding Apple Valley.
  - o Balance of funds will be deducted from the Residential Rehabilitation Program.
  - Funding levels for all outstanding activities will remain the same as proposed in the 2024-2025 Action Plan.

#### HOME

- Should the HOME allocation be higher than \$911,188:
  - The HOME Administration budget will be increased to meet the 10% administration cap allowed under the HOME program (amounts distributed based on HOME Consortia Percentages and Memorandum of Understanding between the Town and City of Victorville).
  - The CHDO Set Aside budget will be increased to meet the 15% minimum CHDO Set Aside requirement under the HOME Program and allocated to the City of Victorville's National Renaissance Northgate Village Apartments Project.
  - Balance of additional funds will be allocated to the Town's Residential Rehabilitation Program and City of Victorville Senior Home Rehabilitation Program (amounts distributed based on HOME Consortia Percentages and Memorandum of Understanding between the Town and City of Victorville).
  - o Funding levels for all outstanding activities will remain the same as proposed in the 2024-2025 Action Plan.
- Should the HOME allocation be lower than \$911,188:
  - The HOME Administration budget will be reduced to be compliant with the 10% administration cap allowed under the HOME program (amounts distributed based on HOME Consortia Percentages and Memorandum of Understanding between the Town and City of Victorville).
  - The CHDO Set Aside budget will be reduced to the 15% minimum CHDO Set Aside requirement under the HOME Program and deducted from the City of Victorville's National Renaissance Northgate Village Apartments Project.
  - Balance of funds will be deducted from the Town's Residential Rehabilitation Program and City of Victorville Senior Home Rehabilitation Program (amounts distributed based on HOME Consortia Percentages and Memorandum of Understanding between the Town and City of Victorville).
  - Funding levels for all outstanding activities will remain the same as proposed in the 2024-2025 Action Plan.

The 2024-2025 Action Plan allocates these resources to fund program activities listed below that will be implemented from July 1, 2024, to June 30, 2025.

#### 2024-2025 CDBG Public Service Activities

Town of Apple Valley: Senior Activities Program	\$40,000
Community Health Action Network: Emergency Assistance Program	\$11,500
Christ the Solid Rock: Lighthouse Food Pantry	\$10,000
Feed My Sheep in the High Desert: Feeding Apple Valley	\$15,909
Inland Fair Housing and Mediation Board: Fair Housing Services	\$10,500
Ruth and Naomi Project Inc.: Sustenance to Services for Seniors	\$10,000

#### 2024-2025 CDBG and HOME Capital Activities

Town of Apple Valley: Residential Rehabilitation Program	\$453,281
Town of Apple Valley: ADA Village North Sidewalk Improvement Project	\$200,000
City of Victorville: Hughes Training and Development Project	\$230,847
City of Victorville: Senior Home Rehabilitation Program	\$223,541
City of Victorville: CHDO National Renaissance Northgate Village Apartments	\$136,679

#### 2024-2025 Program Administration Activities

Town of Apple Valley: CDBG Program Administration	\$130,546
Town of Apple Valley: HOME Program Administration	\$60,826
City of Victorville: Home Program Administration	\$30,292

# 2. Summarize the objectives and outcomes identified in the Plan

The priority needs and goals identified in the Five-Year Consolidated Plan are based on analysis of information including the results of the Town's Resident and Stakeholder Surveys and the housing and community development data elements required by HUD in the online Consolidated Plan system (eCon Planning Suite). Data supplied by HUD includes the 2013-2017 American Community Survey (ACS) 5-Year Estimates and the Comprehensive Housing Affordability Strategy (CHAS) covering the same time. Other sources of information used to identify needs and establish priorities were obtained through consultation with local nonprofit agencies and cited publicly available data.

In consideration of community input and available data, the five (5) priority needs listed below are established as part of the Town's Five-Year Consolidated Plan:

- Supportive services for the homeless and those at risk of homelessness
- Human services
- Housing programs
- Accessibility and mobility
- Economic development including employment opportunities

Consistent with HUD's national goals for the CDBG and HOME programs to provide decent housing opportunities, maintain a suitable living environment and expand economic opportunities for low-and moderate-income residents, the priority needs listed above will be addressed during the 2024-2025 program year through the implementation of activities aligned with the following measurable goals included in the Strategic Plan:

#	Goal Name	Category	Need(s) Addressed	Goal Outcome Indicator
1.	Providing Suitable Living Environments	Homeless Non- Homeless Special	Supportive services for the homeless and those at risk of homelessness	Public Service Activities other than Low/Moderate-Income Housing Benefit: 467 persons assisted
		Needs	Human Services	Homelessness Prevention: 23 persons assisted
2.	Affordable Housing	Affordable Housing	Housing Programs	Homeowner Housing Rehabilitated: 17 Households assisted
			Supportive services for the homeless and those at risk of homelessness	Rental Units Rehabilitated: 140 Household Housing Units
				Housing for Homeless Added: 1 Household Housing Unit
3.	Increase access to essential services and amenities	Non-Housing Community Development	Accessibility and Mobility	Public Facility or Infrastructure Activities other than Low/ Moderate Income Housing: 6,000 persons assisted

#### 3. Evaluation of past performance

Each year, the U.S. Department of Housing and Urban Development (HUD) assesses the Jurisdictions management of CDBG & HOME program funds, the Consortium's compliance with the Five-Year Consolidated Plan and the extent to which the Consortium is preserving and developing decent affordable housing, creating a suitable living environment and expanding economic opportunities. Overall, the Consortium has performed satisfactorily in addressing its priority needs and carrying out the programs described in the current Five-Year Consolidated Plan.

During the period spanning July 1, 2022, through June 30, 2023, the Town and its partners were able to utilize CDBG, CDBG-CV and HOME funds to accomplish the following (current year 2023-2024 not available as of the preparation of this document):

# CDBG and HOME Programs

- Provide Suitable Living Environments to residents by:
  - o Providing shelter and shelter services to a total of 37 unduplicated residents.
  - o Providing food baskets to 908 unduplicated residents.
  - Addressing a total of 3,272 code enforcement cases to address health and safety concerns.
  - o Completing the Hilltop House Demolition Project.
  - Commencing construction work of the ADA Golf Improvement Project which is anticipated to be completed during the 2023-2024 PY assisting approximately 9,801 unduplicated residents.
- Providing Affordable Housing assistance to twelve (12) owner occupied eligible households with financial assistance to rehabilitate their single-family residence under the Town's Residential Rehabilitation Program.
- Providing Economic Opportunities to two (2) eligible microenterprise businesses who have five (5) or fewer employees, including the owner(s), with financial assistance to pay for rental and utility arrears through the release of the Town's Microenterprise Assistance Program (MAP).
- Providing fair housing services to a total of 13 unduplicated residents.

#### CDBG-CV Program

Responding to COVID-19 by providing five (5) eligible small businesses who have been
economically impacted by COVID-19 and who have more than five (5) employees,
including the owner(s), with financial assistance to pay for rental and utility arrears through
the release of the Town's Emergency Business Assistance Program (EBAP). In turn, these
businesses were able to create four (4) full-time equivalent jobs and retain one (1) full-time
equivalent job.

While the Town and local partners were able to successfully implement the activities listed above during the prior program year, there were insufficient resources to fully address the level of need in the Town.

# 4. Summary of Citizen Participation Process and consultation process

The Consolidated Plan regulations at 24 CFR Part 91 provide the citizen participation and consultation requirements for the development of the Consolidated Plan. Chief among those requirements is the need to consult with the Continuum of Care (CoC) to address homelessness, Public Housing Authorities (PHA), business leaders, civic leaders and public or private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families, homeless individuals and families, youth and/or other persons with special needs. Information supplied by these community stakeholders, together with the data supplied by HUD resulted in a well-informed planning document that reflects the housing, community and economic development needs and priorities for the Consortium over the Five-Year Consolidated Plan period.

In accordance with the Town's Citizen Participation Plan (CPP), residents and stakeholders were able to participate in the development of the 2022-2026 Consolidated Plan through surveys, community meetings and public hearings. Efforts were made to encourage participation by low- and moderate-income persons, particularly those living in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. Efforts were made to encourage the participation of minorities and non-English speaking persons, as well as persons with disabilities. The consultation process included representatives of the CoC, PHA, and other specified groups who completed surveys, provided local data, and assisted the Town to ensure practical coordination of strategies to maximize impact and to avoid duplication of effort.

From October 2021 through May 2022, the Town's Housing and Community Development (HCD) Department held community meetings, public hearings, focus groups and conducted surveys to afford citizens and local and regional organizations representing low- and moderate-income residents the maximum feasible opportunity to provide input on the housing and community development needs of the Town. The resident and stakeholder surveys solicited input from residents and employees working in the Town and the City of Victorville. The questionnaire polled respondents about the level of need in their experience for various types of improvements that could potentially be addressed with CDBG and HOME resources. The focus groups were organized by interest group; food banks and homeless services; youth and education services; public servicers; veterans, elderly and disables services; and faith-based organizations. The community meetings and hearings were publicly noticed.

Subsequently, the Town made the draft 2024-2025 AAP available for public review and comment from March 22, 2024, to April 23, 2024. Residents were invited to review the draft AAP and to attend the Public Hearing on April 23, 2024, or submit written comments concerning the housing and community development needs, proposed projects and activities in the AAP, as well as proposed strategies and actions for affirmatively furthering fair housing. No public comments were received.

During the development of the 2024-2025 AAP, the Town solicited applications from various non-profit organizations and Town Departments for the provision of fair housing services, public services, and community and economic development projects. Applications received by the January 25, 2024, deadline were evaluated for eligibility and funding recommendations.

# 5. Summary of public comments

Community meetings, public hearings and surveys were conducted to receive comments on the housing and community development needs. The community meetings were held on November 15, 2021, at 10 am and 6 pm. The resident survey opened and was published on October 29. The public hearings were held on March 8, 2022, and May 10, 2022, at 6 pm. The meetings and hearings were held in person. No comments were received.

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As required by HUD regulations, all comments received, and responses to said comments by the Town are summarized in section AP-12 of this Action Plan. No comments were received during the April 23, 2024, public hearing.

# 6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and views received by the Town were accepted and taken into consideration in the development of the 2024-2025 AAP. A complete list of comments received has been included in Appendix A.

# 7. Summary

The 2024-2025 AAP addresses each of the four (4) Strategic Plan Goals from the 2022-2026 Consolidated Plan by allocating a total of \$652,733 in CDBG funds and \$911,188 in HOME funds towards eligible activities that are to be implemented from July 1, 2024, to June 30, 2025. Activities submitted for consideration in response to any solicitation of Notice of Funding Availability (NOFA) process must conform with one (1) of the four (4) Strategic Plan strategies and the associated action-oriented, measurable goals to be considered to receive CDBG and/or HOME funds.

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# PR-05 Lead & Responsible Agencies - 91.200(b)

# 1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	Apple Valley	Housing & Community Development
HOME Administrator	Apple Valley	Housing & Community Development

Table 1 – Responsible Agencies

#### **Narrative**

The Town serves as the lead agency for coordinating the Consolidated Planning and submission process, while the City of Victorville serves as a subrecipient. The Town's HCD Department is the lead agency responsible for administering its CDBG program and the Consortium's HOME program. The Town's HCD Department shall be responsible for all grants planning, management, and monitoring duties necessary to comply with HUD regulations and Town policies throughout the implementation of the Consolidated Plan and each of the five AAPs, including preparation of its AAP and CAPER.

#### Consolidated Plan Public Contact Information

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# AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

In the preparation of the Consolidated Plan, the Town consulted with public and private departments and agencies and social service and non-profit organizations to understand the community's needs and available resources. The Town met with several department representatives to provide information about the Consolidated Plan and its processes. Department staff provided input on how CDBG and HOME resources could be used and leveraged to provide services. Focus group participants highlighted the priority needs in general terms and specific to the population.

Other jurisdictions within the region were contacted and consulted, including the City of Victorville. As the HOME Consortium lead agency, the Town held joint community meetings as well as strategy sessions to determine priority use of HOME funding over the Five-Year Consolidated Plan period. During the joint consultation process, the Consortium provided detailed information about the Consolidate Plan and HOME program, the Consortiums distribution of funds and current projects using HOME funds.

The Consortium recognizes Apple Valley and Victorville residents are the center of and partners in the development of the Consolidated Plan. The CPP establishes a means by which citizens, public agencies and other interested parties can actively participate in the development of the Consolidated Plan, AAP and the CAPER.

Opportunities to participate in the planning process were provided throughout. Special effort was made to engage low-income persons. The Consortium made efforts to make opportunities for engagement known.

- Public notices were printed in the local newspaper and posted to the Town's website in English and Spanish.
- Web-based surveys links were shared widely through the Town's social media accounts and blast and direct email, hard copies of the survey were also available at Town Hall.
- Stakeholder meetings were targeted to specific groups; especially those of people with disabilities, disadvantaged youths, homeless people.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The Consortium recognizes the importance of careful coordination and alignment among various service providers to maximize the effectiveness of the CDBG and HOME programs. As a result,

during the development of the Consolidated Plan, the Consortium consulted with organizations that provide assisted housing, health services and other community-focused programs. Outreach efforts included surveys, invitations to community meetings, and follow-up in-person interviews where appropriate.

The Consortium further recognizes the importance of continued coordination and alignment during the remainder Consolidated Plan period with these organizations and agencies. The Consortium will reinforce these partnerships through the implementation of the NOFA process for CDBG and HOME funds each year and through technical assistance provided to subrecipients.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

To help prevent homelessness and protect at-risk populations, the Consortium supports and participates in the San Bernardino County Continuum of Care (CoC) System and the San Bernardino County Homeless Partnership (SBCHP) to assist persons at risk of becoming homeless. The CoC is comprised of a network of public, private, faith-based, for-profit, and non-profit service providers who utilize several federal, state and local resources to provide services for homeless people. The region's municipalities, including the Town, also provide resources for services that assist the homeless and those at risk of becoming homeless. The non-profit and faith-based community plays a key role in the current CoC system. Hundreds of agencies throughout the County provide programs ranging from feeding the homeless on the street to creating permanent supportive housing opportunities. These services are available to homeless families with children, and single men and women. The non-profit and faith-based community also serve special needs populations, such as victims of domestic violence, veterans, the disabled and youth.

The CoC guides the development of homeless strategies and the implementation of programs to end homelessness throughout the region. The Town provided a detailed questionnaire to the CoC to identify the CoC's perceived needs in the county and its objectives to address the needs of different homeless persons populations, specifically chronically homeless families and individuals, families with children, veterans, unaccompanied youth and persons at risk of homelessness. Following the delivery and response to this questionnaire, the Town followed up with the CoC to clarify existing needs and objectives and understand opportunities for collaboration and coordination during the Consolidated Plan process.

To address the Town's homeless population, the Town utilizes CDBG funds to provide public and supportive services to prevent homelessness and/or aid those who are homeless or at risk of becoming homeless. Homeless supportive and prevention services funded through the Town's CDBG 2024-2025 program year include:

- Community Health Action Network The program will assist individuals and families at risk of homelessness with emergency utility assistance payments to prevent utility shut off.
- Christ the Solid Rock The program will provide homeless individuals and families with food and case management services.
- Feed My Sheep in the High Desert The program will provide homeless individuals and families with food.
- Inland Fair Housing and Mediation Board The program will provide fair housing mediation and landlord-tenant dispute resolution services, to help prevent homelessness.
- Ruth and Naomi Project Inc. The program will provide elderly individuals at risk of homelessness with food and temporary rental assistance.

The Consortium plans to fund CoC member agencies over the Consolidated Plan period to assist in efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Although not a direct Emergency Solutions Grant (ESG) entitlement community, the Town consulted with a number of housing, social services, governmental and other entities involved in housing and community development in the Town. Through these consultations, the Town identified the holistic needs of the community, including those for extremely low-income households and homeless households individuals and how the Town can continue to effectively coordinate with regional homeless service providers to best meet the needs of these populations. The CoC was consulted directly in person, by telephone and email to discuss performance standards, outcomes, and policies and procedures for HMIS. Through the consultation with the Coc, the Town identified opportunities it could take to better serve its homeless population. For this reason, the Town directly assisted in the most recent Homeless Point in Time Count that was conducted on January 25, 2024. Through the Town's efforts, it was determined that do to the cold temperatures in the High Desert during winter time, there is a tremendous need for warming shelters to ensure the safety of the Town's homeless population. In addition, it was determined that it is difficult to get an accurate count of the homeless population due to following:

- Lack of clear definition of homelessness
- Mobility of the population
- Cyclical nature of homelessness
- Cold temperatures during Point-in-Time Count
- Lack of trust to engage with the public

During the 2024-2025 program year, the Town will work closely with the CoC and its homeless population to curve these difficulties.

The following table provides a listing of the entities consulted as part of this planning process.

# 2. Agencies, groups, organizations and others who participated in the process and consultations

1	Agency/Group/Organization	Rock'n Our Disabilities
	Agency/Group/Organization Type	Services - Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
2	Agency/Group/Organization	Orenda Foundation's Veterans Project
	Agency/Group/Organization Type	Services - Homeless Veterans
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Veterans Economic Development
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

3	Agency/Group/Organization	Victor Valley Family Resource Center
	Agency/Group/Organization Type	Services – Housing Assisted Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
4	Agency/Group/Organization	City of Victorville
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homelessness Strategy Markey Analysis Economic Development Led-Based Paint Strategy Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

5	Agency/Group/Organization	High Desert Second Chance Food Bank
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
6	Agency/Group/Organization	Victor Valley Domestic Violence (A Better Way)
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

7	Agency/Group/Organization	Inland SoCal 211+ (United Way)
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
8	Agency/Group/Organization	Apple Valley PAL
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

9	Agency/Group/Organization	Catholic Charities - San Bernardino
	Agency/Group/Organization Type	Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
10	Agency/Group/Organization	Legal Aid of San Bernardino
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Homeless Needs – Families and Children  Homelessness Needs – Unaccompanied Youth  Homelessness Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

11	Agency/Group/Organization	Western University
	Agency/Group/Organization Type	Mental Health Agency/Facility
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
12	Agency/Group/Organization	No Drugs America
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
13	Agency/Group/Organization	Assistance League of Victor Valley
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

14	Agency/Group/Organization	Inland SoCal United Way
	Agency/Group/Organization Type	Services-Elderly
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
15	Agency/Group/Organization	A Greater Hope
	Agency/Group/Organization Type	Foster Care Agency/Facility
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
16	Agency/Group/Organization	Combat Veteran Motorcycle Association
	Agency/Group/Organization Type	Services - Homeless Veterans
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Veterans Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

17	Agency/Group/Organization	Apple Valley
	Agency/Group/Organization Type	Other Government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
18	Agency/Group/Organization	A Core Solution
	Agency/Group/Organization Type	Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

19	Agency/Group/Organization	High Desert Community Foundation
	Agency/Group/Organization Type	Business Leader
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
20	Agency/Group/Organization	Set Free Church
	Agency/Group/Organization Type	Civic Leader
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

21	Agency/Group/Organization	Lutheran Social Services of So Cal
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
22	Agency/Group/Organization	Inland Fair Housing & Mediation Board
	Agency/Group/Organization Type	Services-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

23	Agency/Group/Organization	Family Assistance Program
	Agency/Group/Organization Type	Services- Victims of Domestic Violence Services-Victims
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
24	Agency/Group/Organization	Victor Valley Community Services Council
	Agency/Group/Organization	Services-Elderly Persons
	Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
25	Agency/Group/Organization	TOAV Park and Recreation
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

26	Agency/Group/Organization	St. John of God Health Care Services
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
27	Agency/Group/Organization	Feed My Sheep
	Agency/Group/Organization Type	Services-Homeless Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

28	Agency/Group/Organization	High Desert Homeless Services
	Agency/Group/Organization Type	Services-Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
29	Agency/Group/Organization	Greater Hope Foundation for Children
	Agency/Group/Organization Type	Services-Children Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
30	Agency/Group/Organization	Spectrum/ Charter Communications
	Agency/Group/Organization	Services-Broadband Internet Service Providers
	Туре	Services-Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Other-Broadband Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

31	Agency/Group/Organization	San Bernardino County Homeless Partnership
	Agency/Group/Organization Type	Services-Homeless Continuum of Care Regional Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
32	Agency/Group/Organization	Department of Housing and Urban Development
	Agency/Group/Organization Type	Federal Government
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Economic Development Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

33	Agency/Group/Organization	City of Victorville
	Agency/Group/Organization Type	Floodplain Management Agency; Water District/Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
34	Agency/Group/Organization	Housing Authority County of San Bernardino
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
35	Agency/Group/Organization	Victor Valley Global Medical Center
	Agency/Group/Organization Type	Services-Health; Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

36	Agency/Group/Organization	Foothill AIDS Project
	Agency/Group/Organization Type	Services-HIV/AIDS
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
37	Agency/Group/Organization	High Desert Detention Center
	Agency/Group/Organization Type	Public Funded Institution
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
38	Agency/Group/Organization	BLM, Barstow Field Office
	Agency/Group/Organization Type	Public Land Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

39	Agency/Group/Organization	Coachella Valley Housing Coalition
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.
40	Agency/Group/Organization	CA HCD
	Agency/Group/Organization Type	State Government
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/ Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	To obtain a comprehensive assessment of the needs and priorities within the community, the Consolidated Plan process included consultation with Consortium residents, service providers and selected departments from each member jurisdiction. Engagement was conducted through surveys, community meetings and focus group interviews.

Table 2 - Agencies, groups, organizations who participated

# Identify any Agency Types not consulted and provide rationale for not consulting

The Town maintains a list of agencies, organizations and other stakeholders that have expressed an interest in the Town's CDBG and HOME programs and invited representatives from each entity to participate at multiple points in the planning process. All agencies were strongly encouraged to attend the community meetings and participate in surveys.

# Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care (CoC)	County of San Bernardino	The County of San Bernardino is a CoC applicant and conducts homeless counts, surveys of the homeless population, and strategic planning to end homelessness. Consistent with the goals of the CoC, the Consortium will provide support to nonprofits that meet the social services needs of the Consortium residents with an emphasis on the homeless.
Housing Element	Town of Apple Valley/ City of Victorville	Based on the Regional Housing Needs Allocation (RHNA) set forth by the State of California, The Housing Element is the Consortium's chief policy document for the development of affordable and market rate housing. Consistent with this policy document, the Consortium will maintain and enhance the quality of existing residential neighborhoods and promote and encourage fair housing opportunities for all economic segments of the community, regardless of age, sex, ethnic background, physical condition, or family size.

Table 3 - Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

As a Consortium, the Town and the City of Victorville coordinate housing and community development strategies among the jurisdictions. The Consortium collaborates with State and local agencies such as jurisdictions in the SBCHP; the California Department of Housing and Community Development regarding the periodic update of the Housing Elements; and neighboring jurisdictions and the County for any partnering opportunities to address housing and community development needs in the region.

The Town's HCD Department works with subrecipients of CDBG funds to ensure a coordinated effort among service agencies in the region to address the needs of the Town's residents, including but not limited to, chronically homeless individuals and families, families with children, veterans and their families, unaccompanied youth, and persons who were recently homeless but now living in permanent housing. To promote economic opportunities for low-income residents, the Town coordinates with subrecipient social service agencies, businesses and housing developers to ensure that where there are job opportunities for low-income people in connection with HUD-assisted projects, information is disseminated through appropriate channels consistent with the objectives of Section 3 of the Housing and Community Development Act of 1968.

#### **Narrative**

The Consortia's collaborative and cooperative planning partnerships with governmental, nonprofit, and private entities are done to ensure that the Consortium's below moderate-income residents' needs and issues are comprehensively evaluated and thoroughly addressed. Aside from these partnerships, other departments within the Consortium are involved in collaborating and cooperating with state and federal entities in planning efforts.

To address consultation requirements regarding broadband, the Town coordinated with Inland Empire Regional Broadband Consortium, Verizon, Spectrum and Frontier to aid in narrowing the digital divide. While broadband is available through multiple providers in the Town, costs may be excessive at times. Access to affordable high-speed broadband is a high public infrastructure need in the Town, especially since COVID-19 which required immediate access to information to ensure individuals were compliant with social distancing requirements to safeguard against immediate infection and school closures which required students to learn from home.

To address consultation requirements regarding resiliency, the Town coordinated with Victor Valley Wastewater Reclamation Authority, California Desert District Office (U.S. Department of the Interior: Bureau of Land Management) and FEMA to help understand and open up the lines of communication for managing public land and water resources, managing flood prone areas and managing emergency situations. Through this consultation, the Town will continue to open and preserve the lines of communication between the stakeholders and the Town and to be active participants in housing and community development planning and program implementation.

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# AP-12 Participation - 91.105, 91.200(c)

# 1. Summary of citizen participation process/Efforts made to broaden citizen participation citizen participation process and how it impacted goal-setting.

In preparation for the Consolidated Plan the Town followed the established processes of the CPP to ensure broad community engagement. At each step, the Town worked to ensure low- and moderate-income residents, members of minority groups, agencies involved in the provision of services to these populations, and others who are directly impacted by the programs and activities supported by the Consolidated Plan programs had the opportunity to be actively involved. The CPP, Consolidated Plan, AAP, CAPER and the Analysis of Impediments to Fair Housing Choice were posted on the Town's website at: <a href="https://www.applevalley.org/services/housing/plans-reports-and-surveys">https://www.applevalley.org/services/housing/plans-reports-and-surveys</a> and a hard copy was made available for review in the Town Housing and Community Development Department for 30 days from April 17 to May 10, 2022.

To assist in identification of priority needs citizens were engaged through community meetings, surveys, public hearings, focus groups, and individual meetings. Citizens who participated in the process received extensive information about the Consolidated Plan, citizen participation process, HUD requirements for entitlement jurisdictions, the amount of funding the Consortium anticipates receiving and how those funds can be used. Residents were given the opportunity to provide staff with their input on the prioritization of community needs. Each of these efforts, including review of HUD Data and relevant policy documents, assisted the Consortium in its goal setting efforts.

Publicly noticed meetings and hearings were held at different stages in the development of the Consolidated Plan. The community meetings were held on November 15, 2021, and the public hearings on March 8 and May 24, 2022. No public comments were received.

On October 29, 2021, the Consortium opened surveys to afford citizens and local and regional organizations representing low-and-moderate income persons the maximum feasible opportunity to provide input on housing and community development needs. The surveys solicited input from residents and employees working in the Consortium. The questionnaire polled respondents about the level of need in their neighborhoods for various types of improvements which could potentially be addressed using federal funds, such as CDBG and HOME allocations. The electronic survey was made available on the Town's website and across its social media platforms. It was also made available in hard copy at Town Hall. The resident survey received 111 responses and the stakeholder survey received four (4) responses.

To satisfy the federal requirements at 24 CFR 91.105(e)(1)(ii), the Town held two (2) public hearings to obtain residents' views on housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing, and a review of program performance. The Town convened the first public hearing on March 7, 2024, to receive comments regarding program performance and funding recommendations for inclusion in the 2024-2025 AAP. The following public comments were received, accepted and incorporated into the 2024-2025 AAP:

- Inland Fair Housing and Mediation Board Stated that they are thankful for the funding to help with more fair housing concerns in Apple Valley.
- Community Health Action Network Expressed how thankful they are for CDBG. The program funds have helped them provide more help for utility assistance for more Apple Valley residents.
- Ruth and Naomi Project, Inc. Expressed that they need the funding to help seniors with meals and other interactions with seniors, do provide food giveaways, and are planning to open another senior home.

Subsequently, the Town made the draft 2024-2025 AAP available for public review and comment from March 22, 2024, to April 23, 2024. Residents were invited to review the draft AAP and to attend the Public Hearing on April 23, 2024, or submit written comments concerning the housing and community development needs, proposed projects and activities in the AAP, as well as proposed strategies and actions for affirmatively furthering fair housing. No public comments were received.

During the development of the 2024-2025 AAP, the Town solicited applications from various non-profit organizations and Town Departments for the provision of fair housing services, public services, and community and economic development projects. Applications received by the January 15, 2024, deadline were evaluated for eligibility and funding recommendations.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/ Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published October 29 & November 5, 2021, in the Apple Valley News announcing two Community Meetings to receive input on the preparation of the Consortium's 2022-2026 Consolidated Plan and the 2022-2023 AAP.	No comments were received.	Not applicable.	Not applicable.
2	Public Meeting	Non-targeted/ Broad Community	Publicly noticed Community Meeting on November 15, 2021, at 10:00 a.m. and 6:00 p.m. at the Apple Valley Town Hall, 14955 Dale Evans Parkway, Apple Valley.	Residents in attendance received a presentation on the Consolidated Plan and discussed housing and community development needs with Staff.	No comments were received.	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
3	Internet Outreach	Non-targeted/Broad Community	The Resident Survey was available online and in paper format at the Housing and Community Development Department from October 29, 2021, to January 14, 2022. The Town advised residents and stakeholders of the availability of the survey via newspaper ad, email to stakeholders, posting on the Town's website, Facebook, Twitter, announcements at Town Council meetings, and during the Community Meetings.	The purpose of the survey was to allow all residents the opportunity to provide their assessment of the level of need in the Town for a variety of housing, community, and economic development activities.  In total, 111 residents completed the survey. A summary of all survey responses is provided in Appendix B of the Consolidated Plan.	All survey responses were accepted.	Not applicable.
4	Newspaper Ad	Non-targeted/ Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published February 18, 2022, in the Apple Valley News announcing Public Hearing to receive input on the preparation of the Consortium's 2022-2026 Consolidated Plan and the 2022-2023 AAP.	No public comments were received.	No comments were received.	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
5	Public Hearing	Non-targeted/ Broad Community	A public hearing was held before the Apple Valley Town Council on March 8, 2022, in Council Chambers to receive input on the highest priority housing, community and economic development needs in the Consortium. This meeting took place prior to the publication of the draft 2022-2026 Consolidated Plan for public review and comment.	No comments were received.	Not applicable.	Not applicable.
6	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published April 22, 2022, in the <i>Apple Valley News</i> announcing the availability of the draft 2022-2026 Consolidated Plan, draft 2022-2023 AAP, draft Analysis of Impediments to Fair Housing Choice, and CPP for a 30-day public review and comment period to include a public hearing before the Apple Valley Town Council on May 10, 2022.	Not applicable.	Not applicable.	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
7	Public Hearing	Non-targeted/Broad Community	Public hearing before the Apple Valley Town Council on May 24, 2022, to receive comments on the draft 2022-2026 Consolidated Plan, draft 2022-2023 AAP, draft Apple Valley Analysis of Impediments to Fair Housing Choice, and draft CPP prior to adoption and submission to HUD.	To be determined.	To be determined	Not applicable
8	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published on December 2, 2022, in the Valleywide Newspaper announcing the Town's Notice of Funding Availability (NOFA) for the 2023-2024 program year.	Not applicable.	Not applicable.	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
9	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published on February 23, 2023, in the Daily Press Newspaper announcing the Town's public hearing before the Community Development Citizen's Advisory Committee (CDCAC) for funding recommendations for inclusion in the draft 2023-2024 AAP.	Not applicable.	Not applicable.	Not applicable.
10	Public Hearing	Non-targeted/Broad Community	Public hearing before the Apple Valley CDCAC on March 9, 2023, to receive comments on funding recommendations for inclusion in the draft 2023-2024 AAP to made available for the 30-day public review period.	Comments received during the public hearing have been included in Appendix A.	All comments were accepted.	Not applicable

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
11	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published March 24, 2023, in the Valleywide Newspaper announcing the availability of the draft 2023-2024 AAP for a 30-day public review and comment period to include a public hearing before the Apple Valley Town Council on April 24, 2023.	Not Applicable.	Not Applicable.	Not Applicable
12	Public Hearing	Non-targeted/Broad Community	Public hearing before the Apple Valley Town Council on April 24, 2023, to receive comments on the draft 2023-2024 AAP prior to adoption and submission to HUD.	No comments received.	No comments received.	Not applicable

Sort Order	Mode of Outreach			Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
13	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published on December 1, 2023, and December 8, 2023, in the Apple Valley News announcing the Town's Notice of Funding Availability (NOFA) for the 2024-2025 program year.	Not applicable.	Not applicable.	Not applicable.
14	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published on February 16, 2024, in the Apple Valley News announcing the Town's public hearing before the Community Development Citizen's Advisory Committee (CDCAC) for funding recommendations for inclusion in the draft 2024-2025 AAP.	Not applicable.	Not applicable.	Not applicable.

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
15	Public Hearing	Non-targeted/Broad Community	Public hearing before the Apple Valley CDCAC on March 7, 2024, to receive comments on funding recommendations for inclusion in the draft 2024-2025 AAP to made available for the 30-day public review period.	Comments received during the public hearing have been included in Appendix A.	All comments were accepted.	Not applicable
16	Newspaper Ad	Non-targeted/Broad Community  Non-English Speaking - Specify Other Language: Spanish	Newspaper ad published March 22, 2024, in the Apple Valley News announcing the availability of the draft 2024- 2025 AAP for a 30-day public review and comment period to include a public hearing before the Apple Valley Town Council on April 23, 2024.	Not Applicable.	Not Applicable.	Not Applicable

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/Attendance	Summary of Comments Received	Summary of Comments Not Accepted and Reasons	URL (If applicable)
17	Public Hearing	Non-targeted/Broad Community	Public hearing before the Apple Valley Town Council on April 23, 2024, to receive comments on the draft 2024-2025 AAP prior to adoption and submission to HUD.	No comments received.	No comments received.	Not applicable

Table 4 – Citizen Participation Outreach

### **Expected Resources**

### AP-15 Expected Resources - 91.220(c)(1,2)

#### Introduction

One of the main obstacles to meeting community needs is inadequate resources. As with most of the priority goals, the needs far outweigh the Consortium's available resources; that are not sufficient to address all the needs of low- and moderate-income persons or special needs residents in the Consortium. It is anticipated that Federal and private funding sources for housing and community development programs will remain limited until the current economic conditions eventually recover. Even under these circumstances, the Consortium strives to make progress in implementing its public improvement and community service projects and programs as well as meeting the established objectives.

The projects and activities included in the 2024-2025 AAP are based on resources that are reasonably anticipated to be available to the Town from federal, state, local and private sources from July 1, 2024, through June 30, 2025. The actual resources available to support activities during the implementation of the remainder of the Consolidated Plan may vary significantly due to factors outside of the Town's control. For example, HUD formula grant allocations are subject to change each year based on several factors such as the amount of the national appropriation, changes in ACS population data applied to the CPD grant formulas, statutory changes to the CPD grant formulas, the addition or removal of entitlements receiving a particular CPD grant and the availability of reallocated funds. Additionally, state, local and private resources will vary significantly depending on the economic conditions.

For the 2024-2025 program year, the Town will receive a CDBG allocation totaling \$652,733 and the Consortium will receive a HOME allocation of \$911,188. The following section summarizes the major sources of funding available to carry out housing and community development activities in the Consortium, and specifically identifies the Consortium's third year and projected funding levels for the remainder of the Consolidated Plan for formula grant CDBG and HOME programs.

## Anticipated Resources

		Uses of Funds	Ε	xpected Amo	unt Available Yea	ar 3	Expected		
Program	Source of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	Narrative Description	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$652,733	\$0	\$0	\$652,733	\$1,305,466	The expected amount available for the remainder of the Consolidated Plan period assumes level funding in future years.	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$911,188	\$0	\$0	\$911,188	\$1,822,376	The expected amount available for the remainder of the Consolidated Plan period assumes level funding in future years.	

Table 5 - Expected Resources - Priority Table

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

Available public resources to serve low- and moderate-income households will need to be distributed across the spectrum of needs and heavily leveraged when possible. This means providing funds for homebuyer assistance, housing rehabilitation, and the creation or development of new housing serving the target groups. The Consortium will actively pursue additional State and federal funding sources to leverage CDBG and HOME Funds.

As a Town with substantial housing and community development needs, Apple Valley needs to leverage its CDBG and HOME entitlement grants with a variety of funding resources to maximize the effectiveness of available funds. The Town's former Redevelopment Agency was the Town's primary non-federal source of leveraged funds. With the elimination of the Town's Redevelopment Agency, the Town's ability to leverage federal funds has been substantially reduced.

Since the initial planning and programming of these resources, the Town's HCD Department has worked closely with other Town departments as well as County, State, and Federal partners to identify other available resources authorized through the CARES Act, the Small Business Administration (SBA), and Federal Emergency Management Agency (FEMA) that may be leveraged to maximize the impact of the CDBG and HOME. These additional resources are listed below:

#### Federal Resources

- Continuum of Care (CoC) Program
- HUD Veterans Affairs supportive Housing (HUD-VASH)
- Supportive Housing for the Elderly (Section 202)
- Supportive Housing for Persons with Disabilities (Section 811)
- Housing Opportunities for Persons with AIDS (HOPWA)
- Youthbuild
- Federal Low-Income Housing Tax Credit Program
- Department of Transportation Grants
- Department of Energy Grants
- Federal Highway Administration
- Emergency Solutions Grant
- HOME Investment Partnerships
- CARES Act
- Project Homekey

#### State Resources

- State Low-Income Housing Tax Credit Program
- Building Equity and Growth in Neighborhoods Program (BEGIN)
- CalHome Program
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding
- Prop 47 Board of State & Community Corrections
- Justice Assistance Grant (JAG) Program
- Homeless Emergency Aid Program (HEAP)
- Project Roomkey

#### Local Resources

- San Bernardino County Homeless Partnership (SBCHP)
- Housing Authority of the County of San Bernardino (HACSB)
- Southern California Home Financing Authority (SCHFA) Funding
- San Bernardino County Continuum of Care Program
- General Fund

#### Private Resources

- Federal Home Loan Bank Affordable Housing Program (AHP)
- Community Reinvestment Act Programs
- United Way Funding
- Private Contributions

#### HOME Matching Requirements

The Consortium will be receiving \$911,188 in HOME funding which can be leveraged with CDBG funding if used for affordable housing. The Consortium will leverage HOME funding if future eligible projects are presented during the remaining Consolidated Plan period. The HOME Program requires a 25-percent match based on funding expenditure. The HOME statute provides a reduction of the matching contribution requirement under three conditions: 1) Fiscal distress; 2) Severe fiscal distress; and 3) Presidentially declared major disasters covered under the Stafford Act. The Consortium has been identified by HUD as a fiscally distressed jurisdiction and has been granted a 100-percent match reduction for the 2023-2024 program year. The Consortium expects this designation to occur in the 2024-2025 program year as well.

# If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Each year the Town has participated in the opportunity to purchase vacant lots through the County's eligible tax lien sales. Through the years, the Town has acquired some of these eligible vacant lots with the intent to continuously meet the Town's General Plan and Housing Element goals for increasing the amount and availability of affordable housing units within the Town. During the 2024-2025 program year, the Town will look at potentially utilizing these lots to address the affordable housing needs represented in the 2024-2025 AAP. In addition, through the NSP III, the Town acquired a property that it plans to utilize for the development of affordable multi-family housing units.

#### Discussion

The Town shares overall responsibility for meeting the priority needs identified in the Strategic Plan with many other organizations. The Town is responsible for using CPD entitlement funds to address the needs of low- and moderate-income residents. Other Town departments and organizations provide services to low- and moderate-income residents by utilizing funding from federal, state, local and private resources.

During the 2024-2025 program year, the Town will rely on other public and private funding, including but not limited to:

- Low-Income Housing Tax Credits
- Project-based Section 8 certificates
- Project financing at favorable interest rates from local lenders
- Private market real estate investments
- Market rate housing that subsidizes affordable units on the same development site to enhance the availability, affordability and sustainability of affordable housing

Along with leveraged dollars, the Town will allocate \$652,733 of CDBG funds and \$911,188 of HOME funds during the 2024-2025 program year on public service, housing preservation and public facility and infrastructure improvement activities that promote a suitable living environment and decent housing.

# Annual Goals and Objectives

# AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

## Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Suitable Living Environments	2024	2025	Homeless Non-Homeless Special Needs	Townwide	Supportive services for the homeless and those at risk of homelessness Human Services	CDBG: \$97,909	Public Service activities other than Low/Moderate Income Housing Benefit: 467 Persons Assisted  Homelessness Prevention: 23 persons assisted
2	Affordable Housing	2024	2025	Affordable Housing	Townwide/Citywide	Housing Programs  Supportive services for the homeless and those at risk of homelessness	CDBG: \$224,278 HOME: \$820,070	Homeowner Housing Rehabilitated: 17 Household Housing Units  Rental Units Rehabilitated: 140 Household Housing Units  Housing for Homeless Added: 1 Household Housing Unit
3	Increase Access to Essential Services and Amenities	2024	2025	Non-Housing Community Development Non-Homeless Special Needs	Townwide	Accessibility and Mobility	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6,000 Persons Assisted
4	Administration	2024	2025	Administration	Townwide/Citywide	All	CDBG: \$130,546 HOME: \$91,118	Other - 3

Table 6 – Goals Summary

#### **Goal Descriptions**

1	Goal Name	Provide suitable living environments
	Goal Description	Support assistance to homeless persons to acquire the necessary documentation and consultation (mental health, physical health and nutrition, job skills training, identification, social security, and disability benefits, etc.) to achieve reentry into employment and housing; food and nutrition services; utility assistance; support assistance to non-homeless special needs populations.
2	Goal Name	Affordable Housing
	Goal Description	Transitional shelters; affordable housing for multi-family, single family, veterans; rehabilitation owner occupied and rental; down payment assistance; code enforcement activity to improve neighborhood aesthetics and values; reduce overcrowding in occupied properties; consider establishing rent control for affordability; encourage collaboration between public agencies, developers, investors, and other stakeholders to develop a wide range of housing development.
3	Goal Name	Increase Access to Essential Services and Amenities
	Goal Description	Develop and support efforts to improve mobility in the community; identify and remove barriers that impede accessibility in the community; support transit systems, mass and specialized, that enable residents to access destinations for employment, education, recreation, and other essential purposes; support collaborative efforts to improve community and regional transit.
4	Goal Name	Administration
	Goal Description	Provide for the timely and compliant administration of the CDBG and HOME programs in accordance with HUD policy and federal regulations. HUD requires the Town to represent Administration funds as a "goal" within the Strategic Plan so that the sources of funds (refer to Section AP-35) are fully allocated to goals.

Table 7 – Goal Description

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

The Town's Residential Rehabilitation Program (RRP) and City of Victorville's Senior Home Rehabilitation Program (SHRP) will provide for the rehabilitation of 17 existing units for very low and low-income households. The City of Victorville will be allocating \$230,847 of HOME funds to its Hughes Training and Development Project which will consist of rehabilitating the main house to include a new roof, address lead-based paint remediation, and barriers to accessibility. The project will provide transitional housing for homeless individuals, and physical and mentally disabled individuals. It is anticipated that the project will assisted 18

extremely low income persons. Lastly, the Consortium's Community Housing Development Organization (CHDO) set aside dollars will go towards the National Renaissance Northgate Village Apartments Project which will provide for three (3) roof replacements, and replacements of water heaters and support beams at the complex. The improvements are anticipated to assist approximately 140 very low and low-income households in an effort to address the affordable housing needs in the community.

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### AP-35 Projects - 91.420, 91.220(d)

#### Introduction

The Town and the Consortium anticipate completing the following funded activities during the 2024-2025 AAP period:

#### **Projects**

#	Project Name
1	TOAV: Parks and Recreation – Senior Activities Program
2	Community Health Action Network – Emergency Assistance Program
3	Christ the Solid Rock Missionary Baptist Church – Lighthouse Food Pantry
4	Feed My Sheep in the High Desert – Feeding Apple Valley
5	Inland Fair Housing and Mediation Board (IFHMB) – Fair Housing Services
6	Ruth and Naomi Project, Inc. – Sustenance to Services for Seniors
7	CDBG Residential Rehabilitation Program (RRP)
8	ADA Village North Sidewalk Improvement Project
9	CDBG Program Administration
10	AV Home Program Administration
11	AV HOME Residential Rehabilitation Program (RRP)
12	VV HOME Program Administration
13	VV CHDO National Renaissance Northgate Village Apartments Project
14	VV HOME Hughes Training and Development Project
15	VV HOME Senior Home Repair Program (SHRP)

Table 8 - Project Information

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

Based on the Strategic Plan, the Town and Consortium are allocating 100 percent of its non-administrative CDBG and HOME investments for program year 2024-2025 to projects and activities that benefit low- and moderate-income people. The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state, and other local sources.

# AP-38 Project Summary

## Project Summary Information

1	Project Name	TOAV: Parks and Recreation – Senior Activities Program
	Target Area	Townwide
	Goals Supported	Provide suitable living environments
	Needs Addressed	Human services
	Funding	CDBG: \$40,000
	Description	Seniors (age 62 and older) will receive scholarships of up to \$500/year to participate in a multitude of different activities free of costs. Such classes include but are not limited to: Aqua Zumba, Yoga, Tai Chi, and Pickleball.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	80 persons assisted
	Location Description	Townwide
	Planned Activities	TOAV: Parks and Recreation – Senior Activities Program (80 persons assisted) - \$40,000

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2	Project Name	Community Health Action Network – Emergency Assistance Program
	Target Area	Townwide
	Goals Supported	Provide suitable living environments
	Needs Addressed	Human services
	Funding	CDBG: \$11,500
	Description	The program will provide emergency utility (gas bill, electrical bill, etc.) payment assistance to low-income individuals and families.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	23 persons assisted
	Location Description	Townwide
	Planned Activities	Community Health Action Network – Emergency Assistance Program (23 persons assisted) - \$11,500

3	Project Name	Christ the Solid Rock Missionary Baptist Church – Lighthouse Food Pantry
	Target Area	Townwide
	Goals Supported	Provide Suitable Living Environments
	Needs Addressed	Supportive services for the homeless and those at risk of becoming homeless
	Funding	CDBG: \$10,000
	Description	The program will support the need for hunger relief to the homeless and less fortunate through a food bank/pantry program. The pantry will operate 4 days a week and will be serviced by medically trained nurses, trained volunteers, and adult and youth counselors.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	40 persons assisted
	Location Description	Townwide
	Planned Activities	Christ the Solid Rock Missionary Baptist Church: Lighthouse Food Pantry (40 persons assisted) - \$10,000

4	Project Name	Feed My Sheep in the High Desert – Feeding Apple Valley
	Target Area	Townwide
	Goals Supported	Provide Suitable Living Environments
	Needs Addressed	Supportive services for the homeless and those at risk of becoming homeless
	Funding	CDBG: \$15,909
	Description	The program will provide food to low-income seniors, disabled adults and the homeless. The agency desires to supply both bagged groceries and protein to residents as an integral part of the program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	182 persons assisted
	Location Description	Townwide
	Planned Activities	Feed My Sheep in the High Desert: Feeding Apple Valley (182 persons assisted) - \$15,909

5	Project Name	Inland Fair Housing and Mediation Board (IFHMB) – Fair Housing Services
	Target Area	Townwide
	Goals Supported	Provide Suitable Living Environments
	Needs Addressed	Human Services
	Funding	CDBG: \$10,500
	Description	The program will provide education, outreach, and enforcement activities to affirmatively further fair housing. Residents will receive assistance obtaining remedy for violations of their federal and state fair housing rights through investigation, mediation, and other enforcement activities.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	5 persons assisted
	Location Description	Townwide
	Planned Activities	Inland Fair Housing and Mediation Board (IFHMB): Fair Housing Services (5 persons assisted) - \$10,500

6	Project Name	Ruth and Naomi Project, Inc. – Sustenance to Services for Seniors
	Target Area	Townwide
	Goals Supported	Provide Suitable Living Environments
	Needs Addressed	Human Services
	Funding	CDBG: \$10,000
	Description	The program will provide elderly persons with access to food pantry, computer and cell phone classes, healthy eating and health care informational seminars, future planning and financial classes, grief support groups, sewing and alterations classes, and emergency rental assistance.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	160 persons assisted
	Location Description	Townwide
	Planned Activities	Ruth and Naomi Project, Inc. – Sustenance to Services for Seniors (160 persons assisted) - \$10,000

7	Project Name	CDBG Residential Rehabilitation Program (RRP)
	Target Area	Townwide
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Programs
	Funding	CDBG: \$224,278
	Description	This program will provide financial assistance to rehabilitate low-income single-family owner-occupied homes. Such improvements will address health and safety concerns as well as code violations.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	4 household housing units
	Location Description	Townwide
	Planned Activities	CDBG Residential Rehabilitation Program (RRP) (4 household housing units) - \$224,278

8	Project Name	ADA Village North Sidewalk Improvement Project
	Target Area	Townwide
	Goals Supported	Increase Access to Essential Services and Amenities
	Needs Addressed	Accessibility and Mobility
	Funding	CDBG: \$200,000
	Description	The project will construct a new continuous accessible pedestrian pathway throughout the northerly portion of the Village in Apple Valley. Existing non-ADA compliant sidewalks will be removed, and a new 6-foot continuous accessible pathway will be installed in its place along with curb ramps, driveway approaches, and crosswalks.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	6,000 persons assisted
	Location Description	Yucca Loam Road between Navajo Road and west of Valley Drive
	Planned Activities	ADA Village North Sidewalk Improvement Project (6,000 persons assisted) - \$200,000

9	Project Name	CDBG Program Administration
	Target Area	Townwide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	CDBG: \$130,546
	Description	Funds are used in the administration of the CDBG program.
	Target Date	6/30/2025
	Estimate the number and type of families	Other - 1
	that will benefit from	
	the proposed activities	
	Location Description	Townwide
	Planned Activities	CDBG Program Administration (Other – 1) - \$130,546

10	Project Name	AV HOME Program Administration
	Target Area	Townwide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	HOME: \$60,826
	Description	Funds are used in the administration of the HOME program.
	Target Date	6/30/2025
	Estimate the number and type of families	Other - 1
	that will benefit from	
	the proposed activities	
	Location Description	Townwide
	Planned Activities	AV HOME Program Administration (Other – 1) - \$60,826

11	Project Name	AV HOME Residential Rehabilitation Program (RRP)
	Target Area	Townwide
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Programs
	Funding	HOME: \$229,003
	Description	This program will provide financial assistance to rehabilitate low-income single-family owner-occupied homes. Such improvements will address health and safety concerns as well as code violations.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	3 household housing units
	Location Description	Townwide
	Planned Activities	AV HOME Residential Rehabilitation Program (RRP) (3 household housing units) - \$229,003

12	Project Name	VV HOME Program Administration
	Target Area	Citywide
	Goals Supported	Administration
	Needs Addressed	Administration
	Funding	HOME: \$30,292
	Description	Funds are used in the administration of the HOME program.
	Target Date	6/30/2025
	Estimate the number and type of families	Other - 1
	that will benefit from	
	the proposed activities	
	Location Description	Citywide
	Planned Activities	VV HOME Program Administration (Other – 1) – \$30,292

13	Project Name	VV CHDO National Renaissance Northgate Village Apartments
		Project
	Target Area	Citywide
	Goals Supported	Affordable Housing
		J. Control of the con
-	Needs Addressed	Housing Programs
	Funding	HOME: \$136,679 (CHDO dollars)
	Description	The project will provide for three (3) roof replacements and the
		replacement of various water heaters and support beams
		throughout the complex.
	Target Date	6/30/2025
	Estimate the number	140 household housing units
	and type of families	
	that will benefit from	
	the proposed activities	
	Location Description	17251 Dante Street, Victorville, CA 92394
	DI LACTO	NA CHECAN COLOR
	Planned Activities	VV CHDO National Renaissance Northgate Village Apartments Project (140 household housing units) - \$136,679

14	Project Name	VV HOME Hughes Training and Development Project
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Programs
	Funding	HOME: \$230,847
	Description	The project will consist of rehabilitating the main house to include a new roof, addressing lead-based paint remediation, and barriers to accessibility. The project will provide transitional housing for homeless individuals, and physical and mentally disabled individuals.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	1 household housing unit
	Location Description	14624 Mesa Drive, Victorville, CA
	Planned Activities	VV HOME Hughes Training and Development Project (1 household housing units) - \$230,847

15	Project Name	VV HOME Senior Home Rehabilitation Program (SHRP)
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Programs
	Funding	HOME: \$223,541
	Description	This program provides financial assistance to senior and disabled/handicapped homeowners to correct code violations and make ADA improvements.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	10 household housing units
	Location Description	Citywide
	Planned Activities	VV HOME Senior Home Rehabilitation Program (SHRP) (10 household housing units) - \$223,541

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

The primary obstacle to meeting the needs of the most underserved groups in the Consortium (primarily low-income families, seniors, youth, and the homeless) is the general lack of funding resources available to the public and private agencies providing the services to meet those needs.

In addition, cities across California are grappling with ramifications of Assembly Bill 1X26, which, in conjunction with a December 2011 California Supreme Court decision, eliminated RDAs and the associated diversion of property tax increment revenue to RDAs (known as tax increment or redevelopment funds). Redevelopment funds have represented one of the largest funding sources for affordable housing in California (redevelopment law required that 20 percent of the funds must be spent for affordable housing) and were utilized to revitalize blighted areas and foster economic development in redevelopment project areas.

At the federal level, entitlement grants have not kept up with inflation, further decreasing funds available to provide services to meet needs within the Consortium. With inflation, lower incomes, and the growing needs of low-income persons and special needs groups, the limited funding resources is a significant obstacle to meeting underserved needs in the Consortium.

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### AP-50 Geographic Distribution - 91.420, 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The 2024-2025 AAP does not identify specific targeted geographic areas. All CDBG and HOME funds will be directed toward activities benefitting low- and moderate-income residents, town-wide and all Consortium funds will be directed toward activities benefitting low- and moderate-income residents Consortium-wide.

#### Geographic Distribution

Target Area	Percentage of Funds
Townwide	100%

Table 10 - Geographic Distribution

#### Rationale for the priorities for allocating investments geographically

The Town will be allocating 100 percent of its non-administrative CDBG funds and 100 percent of its HOME investments funds during program year 2024-2025 to projects and activities that benefit low- and moderate-income people. While the Town typically targets public facility and infrastructure activities in eligible areas, the Town does not target specific neighborhoods with concentrated investment and instead evaluates funding on a Townwide basis when determining eligibility. The Town is not requesting approval of a Neighborhood Revitalization Strategy Area as part of its Consolidated Plan.

#### Discussion

Based on the Strategic Plan, the Town and Consortium are allocating 100 percent of its non-administrative CDBG and HOME investments for program year 2024-2025 to projects and activities that benefit low- and moderate-income people Town- and Consortium-wide.

#### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

Three (3) main housing problems (a) cost-burdened households, (b) substandard housing; and (c) overcrowding are identified in the in the Consolidated Plan. For these reasons, there is a high need for additional rental housing units affordable for households earning less than 80 percent of AMI. According to ACS and CHAS data, approximately 30,629 of the households earning 0-80 percent of AMI, are cost burdened households — meaning households paying more than 30 percent of their income for housing. Furthermore, 10,980 of those households are considered severely cost burdened—meaning they pay more than 50 percent of their income for housing. Within the severely cost burdened households, 6,680 are renters and most of those households (6,255) earn less than 50 percent of AMI and are considered the most at risk of becoming homeless.

To address these problems during the 2024-2025 program year, the Town has allocated \$453,281 (\$224,278 CDBG and \$229,003 HOME) to its Residential Rehabilitation Program which will provide financial assistance to rehabilitate eligible owner-occupied single-family residences.

One Year Goals for the Number of Households to be Supported		
Homeless	18	
Non-Homeless	157	
Special-Needs	0	
Total	175	

Table 11 - One Year Goals for Affordable Housing by Support Requirement

<sup>\*</sup> Hughes Training and Development Project

One Year Goals for the Number of Households Supported Through		
Rental Assistance	0	
The Production of New Units	0	
Rehab of Existing Units	175	
Acquisition of Existing Units	0	
Total	175	

Table 12 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The Town has identified a high priority need to increase the supply of affordable housing and a high priority need to preserve the supply of affordable housing. During the 2024-2025 program year, the

Town and Consortium will invest CDBG and HOME funds under its Residential Rehabilitation Program and Senior Home Rehabilitation Program to rehabilitate 17 existing housing units. The City of Victorville will be allocating \$230,847 of HOME funds to its Hughes Training and Development Project which will consist of rehabilitating the main house to include a new roof, addressing lead-based paint remediation, and barriers to accessibility. The project will provide transitional housing for homeless individuals, and physical and mentally disabled individuals. It is anticipated that the project will assist 18 persons. Lastly, the Consortium's Community Housing Development Organization (CHDO) set aside dollars will go towards the National Renaissance Northgate Village Apartments Project which will provide for three (3) roof replacements, and replacements of water heaters and support beams throughout the complex. The improvements are anticipated to assist approximately 140 households.

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#### AP-60 Public Housing - 91.420, 91.220(h)

#### Introduction

The Housing Authority of the County of San Bernardino (HACSB) has been one of the leading providers of affordable housing in the County of San Bernardino for over 70 years. San Bernardino County is the largest county by land area in the contiguous United States consisting of 24 cities and covering over 20,000 square miles of land. By population, it is the twelfth largest county in the nation, with more residents than some states.

According to the HACSB's 2022 Annual Report, HACSB was one of the first housing authorities to apply for the new Rental Assistance Demonstration (RAD) program when it launched nationally in 2012 and began converting their nearly 1,300 Public Housing units located across the county to Housing Choice Voucher (HCV) units in 2015. That conversion was completed in May 2022, almost exactly eight (8) years after they began. HACSB has one Public Housing unit remaining. All public housing programs consist of housing choice and project-based vouchers administered by the HACSB. According to the HACSB' 2022 Annual Report, there are 10,461 housing choice vouchers are administered throughout San Bernardino County. Of these, 264 were issued to Apple Valley residents. HACSB monitors all units to ensure they are in adequate condition, meeting the Section 8 Housing Quality Standards (HQS).

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

During the 2024-2025 program year, HACSB will continue providing housing and public services to existing residents of HUD Public Housing units and HACSB-owned affordable housing units. HACSB will continue to maintain and expand the supply of affordable housing units in the Town and throughout San Bernardino County through its partnerships with the State of California and San Bernardino County Department of Community Development and Housing.

Due to rising rents and low vacancy rates in San Bernardino County, HACSB has been working with HUD to expand its Local Payment Standards Moving to Work (MTW) initiative to allow HACSB to be more adaptable to changing market rents. Through their 2023 Annual MTW Plan, HACSB modified their Local Payment Standards MTW Initiative to allow them to make mid-year changes to their Local Payment Standards for MTW vouchers. With these changes, if market rents shift suddenly and dramatically, they can adjust their Local Payment Standards to adapt to the current market. HACSB also modified their methodology for determining Local Payment Standards to anticipate market growth over the year (HACSB Annual Report 2022).

HACSB's 2022 Annual MTW Plan included a new activity that focuses on attracting and retaining landlords to lease to assisted households, and help households locate housing assistance through housing navigation services. The Landlord Signing Bonus will provide an incentive payment of \$1,000 to the landlord for each unit newly leased to a HACSB MTW voucher program participant (HACSB Annual Report 2022).

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Through the national expansion of the HCV program, which will include approximately 19,700 new HCV nationwide, HACSB will be allocated 102 new HCV. These new vouchers will help HACSB serve families currently waiting for assistance (HACSB Annual Report 2022).

For over ten years, HACSB has partnered with Loma Linda University (LLU) for third-party research and evaluation of the programs they administer. The lessons learned from this partnership help shape local policy decisions and help advocate for policy change on a national scale. In 2023, HACSB will continue to work with LLU for the evaluation of the Emergency Housing Voucher (EHV) program. EHV couples rental assistance with housing navigation services and other supportive services, and targets vulnerable populations including homeless individuals and victims of domestic/dating violence. Through the research with LLU, HACSB hopes to identify which factors influence a family's ability to successfully enter the program and sustain stable housing. Initial findings found that there are five (5) primary barriers to successful leasing 1) Tenant Preference (location, amenities, etc.); 2) Inability to Maintain Contact Between Housing Navigation Service and Customer; 3) Financial Barriers; 4) Physical Limitations (such as first-floor unit needed but unavailable); and 5) Legal Barriers. This research will be especially important so that HACSB can share what they learn and push for solutions that they know work as Congress looks to expand rental assistance programs in 2024 and beyond (HACSB Annual Report 2021 and 2022).

On August 16, 2022, HUD announced the new Stability Vouchers (SV) Program. This new program will serve eligible low-income households who are homeless, at-risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, and veteran households who meet one of these criteria. HACSB anticipates receiving funding to assist up to 30 households through this new program (HACSB Annual Report 2022).

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

HACSB encourages residents to be actively involved in the community and in the management of public housing developments through resident councils and numerous opportunities for feedback such as community meetings and surveys. HACSB and the Town also actively encourage and promote public housing residents to explore homeownership opportunities and programs through HACSB's Homeownership Assistance Program targeted at current residents. HACSB also encourages and supports residents in participating in homebuyer counseling programs and recommends residents use the family self-sufficiency escrow account to save money towards homeownership. Under the Family Self-Sufficiency Program (FSS) participants develop a five-year training and service plan that outlines the steps to become employed, increase their earnings, and become independent of government assistance. Upon graduation of the FSS program, graduates are allowed to use the escrow account funds towards homeownership. The FFS program is planned to close out through the 2024 MTW Annual Plan (2024 MTW Plan).

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Under the Housing Authorities Homeownership Assistance Program, families are provided mortgage assistance for up to 15 years for working families and up to 30 years for disabled families. More than 260 families have become homeowners through the program since 2000 (HACSB 2022 Annual Report).

The Town also provides a number of resources on services for foreclosure prevention and counseling. Although not currently allocated funds in this AAP, the Town will be looking into bringing back its Homebuyer Assistance Program (HAP) and anticipates allocating funds to this program via future AAPs or Substantial Amendments. As of the date of this AAP, the Town is currently in the process of updating its existing HAP Program Guidelines and Policies and Procedures to be more conducive to the current market conditions, high interest rates and bidding wars.

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

Not applicable. HACSB is considered a High Performing PHA.

#### Discussion

The Town and HACSB will continue their partnership to address challenges including rents that are rising faster than families' incomes, and the need to preserve existing aging affordable housing for future generations. However, the HACSB is well-positioned to maintain and expand the supply of affordable housing units in the Town and throughout San Bernardino County through its partnerships with the State of California, San Bernardino County Department of Community Development and Housing, the Town and other cities throughout the county.

In 2020, HACSB embarked on a path to update its long-term strategic goals, but within days, the world's focus shifted to the emerging COVID-19 pandemic and the State of California shut down in response to Governor Gavin Newsom's Stay-At-Home Executive Order on March 19, 2020. The immediate and ongoing challenges and changes brought on by the pandemic had a direct impact on the families and communities served. HACSB worked to implement immediate changes to help protect families experiencing hardships resulting from the pandemic and ensure that they were positioned to continue providing services to customers without interruption. Years later, many of the changes necessitated by the pandemic have become routine practice for HACSB. Five core goals for HACSB were identified and are noted as Aspirational Statements (HACSB 2022 Annual Report):

1) To ensure that HACSB's culture empowers and values its team through effective communication, learning opportunities, work/life balance, professional development, and a shared passion for the mission.

- 2) To be known as a trusted provider of safe, dignified, and desirable homes and environments that enrich and add value to the community.
- 3) To pursue continued financial stability, monitoring, and accountability as stewards of limited funding.
- 4) To utilize research and technology to drive the creation of innovative programming and operational processes that allow us to be more effectively responsive and result in the advancement of the families we serve.
- 5) To create, build, and utilize partnerships that provide opportunities and create a meaningful difference in the lives of the families that we serve, maximizing our resources by mobilizing the talents of our community partners.

#### AP-65 Homeless and Other Special Needs Activities – 91.420, 91.220(i)

#### Introduction

The Town will be programming 2024-2025 CDBG funds to various public service agencies to address high priority needs including preventing homelessness and providing assistance to those who have become homeless. This will be accomplished through homeless prevention programs, food bank distribution programs, and beneficiary assistance for rental and utility payments.

#### Homelessness Prevention Services

According to the results of the most recent data available from the 2023 Point-in-Time Homeless Count (PIT Count) held on January 26, 2023, on any given night in San Bernardino County, approximately 4,195 adults and children are homeless. For the Town, a total of 35 homeless individuals were identified, of which 3 individuals were reported as being sheltered and the remaining 32 individuals were unsheltered. To address incidences of homelessness in the Town and to prevent extremely-low income Apple Valley families from becoming homeless, the Town will place a high priority on programs that work to prevent homelessness or rapidly connect homeless individuals with housing and supportive services. To address this need, the Town will support a continuum of services in the Town utilizing leveraged funds through the San Bernardino County CoC to prevent and eliminate homelessness including, but not limited to, homelessness prevention programs, food bank distribution programs, and beneficiary assistance for rental and utility payments.

During the 2024-2025 program year, the Town will utilize CDBG funds to program dollars to homelessness prevention services provided by agencies such as Community Health Action Network, Feed My Sheep in the High Desert, Christ the Solid Rock and Inland Fair Housing and Mediation Board which anticipate providing services to a vast amount of Apple Valley residents.

#### Services for Residents with Special Needs

Analysis of available data and consultation with organizations providing services for special needs populations revealed a high need for a range of additional services including, but not limited to those concerned with developmentally disabled adults. To address these needs, the Town will allocate CDBG and HOME dollars for its Residential Rehabilitation Program which allows eligible single-family owner-occupied residents the ability to complete home improvements, which include but are not limited to accessibility improvements such as, ADA compliant toilets, showers, accessibility ramps, etc. In addition, the Town will be allocating \$200,000 in CDBG funds towards Public Facility and Infrastructure Improvements to address sidewalk accessibility issues in the Town's Downtown Village area.

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

The Consortium's one-year goal is to provide suitable living environments for the Consortia's residents by engaging in street outreach and engagement activities to reach homeless populations.

To reach out to unsheltered homeless persons and assess their individual needs for the purpose of connecting them with available shelter, housing and services, the Town will provide information and referrals — primarily to 2-1-1 of San Bernardino County. To reduce and end homelessness, the Town will provide CDBG public service funds to the following activities:

- TOAV Parks and Recreation: Seniors Activities Program
- Community Health Action Network: Emergency Assistance Program
- Christ the Solid Rock: Lighthouse Food Pantry
- Feed My Sheep in the High Desert: Feeding Apple Valley
- Inland Fair Housing and Mediation Board: Fair Housing Services
- Ruth and Naomi Project, Inc.: Sustenance to Services for Seniors

Furthermore, the Town will provide capital improvement funding for Public Facility and Infrastructure Improvements to address sidewalk accessibility issues in the Town's Downtown Village area.

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

The Consortium's one-year goal is to provide suitable living environments for the Consortium's residents by partnering with agencies that support homeless populations and reviewing policy relating to emergency shelter and transitional housing needs. To address the emergency shelter and transitional housing needs of homeless persons, the Town will support the following actions:

- The Town has allocated HOME ARP funds toward supportive services for the City of Victorville Wellness Center Campus. The Wellness Center Campus will be the first facility of its kind in San Bernardino County and will play a critical role in helping homeless individuals stabilize their lives. The Campus will provide 170 beds and will allow the Wellness Center to serve several functions by providing a low-barrier emergency shelter, recuperative care facility, medical clinic, interim housing and wrap around supportive services such as case management, care coordination, job training/placement and housing navigation.
- The Town shall encourage the development of Homeless Shelters, Transitional Housing and Single Room Occupancy by complying with Government Code Section 65583, which requires these uses to be identified in the Development Code. Application fee waivers shall also be given to these projects proposed in the Town.

• The Consortia will continue to work jointly with the San Bernardino County's CoC, which provides funding and a network of resources for homeless individuals and those at-risk of homelessness. The CoC provides emergency shelter, supportive services, transitional housing, and permanent housing. The Town commits staff to the CoC planning and implementation process and provides the CoC Steering Committee critical information regarding the types of resources and programs provided to assist the homeless.

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

The Consortium's one-year goal is to provide suitable living environments for the Consortium's residents by funding and partnering with agencies that support homeless and at-risk of homeless populations.

During the 2024-2025 program year, the following activities will be implemented to help homeless persons make the transition to permanent housing and independent living:

- Community Health Action Network: Emergency Assistance Program The program will
  provide emergency utility assistance to low-income individuals and families at risk of
  becoming homeless with payment assistance with their utilities (gas bill, electrical bill, etc.).
- Christ the Solid Rock Missionary Baptist Church: Lighthouse Food Pantry The program will support the need for hunger relief to the homeless and less fortunate through a food bank/pantry program. The pantry will operate 4 days a week. The program will be serviced by medically trained nurses, trained volunteers, and adult and youth counselors.
- Feed My Sheep in the High Desert: Feeding Apple Valley The program will provide assistance to Apple Valley residents that are 62+, homeless, and disabled adults. Beneficiary individuals will receive food on Fridays from 10 A.M. 12 P.M., as well as holiday dinners (Easter, Thanksgiving and Christmas) that may be delivered or picked up on a different designated day and time. Feed My Sheep desires to supply both bagged groceries and protein to residents as an integral part of the program.
- Ruth and Naomi Project, Inc: Sustenance to Services for Seniors The program will provide elderly individuals at risk of homelessness with access to a food pantry, computer and cell phone classes, healthy eating and health care informational seminars, future planning and financial classes, grief support groups, sewing and alterations classes, and beneficiary assistance in the form of rental payments to prevent eviction.

• The Consortia will participate in the San Bernardino County's CoC, which provides funding and a network of resources for homeless individuals. The CoC provides emergency shelter, supportive services, transitional housing, and permanent housing. The Town commits staff to the CoC planning and implementation process and provides the CoC Steering Committee critical information regarding the types of resources and programs the Consortia currently funds that assist the homeless.

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

The Town will continue to work with and refer residents to the County's Department of Behavioral Health (DBH) to ensure residents are provided the immediate attention and services they require to prevent homelessness and encourage self-sufficiency. The DBH's Mental Health Services Act (MHSA) Housing Program allows DBH to support seven housing projects that include 104 Permanent Supportive Housing (PSH) units, housing those who are living with a serious mental illness and/or substance use disorder (2022-2023 San Bernardino County DBH MHSA Annual Plan).

In addition, the Town will coordinate with local hospitals regarding Senate Bill No. 1152 which requires each hospital to have a written discharge planning policy and process that requires that the appropriate arrangements for posthospital care are made prior to discharge for those patients likely to suffer adverse health consequences upon discharge if there is no adequate discharge planning. The bill would require a hospital to document specified information before discharging a homeless patient. The bill would require a hospital to develop a written plan for coordinating services and referrals for homeless patients with the county behavioral health agency, health care and social service agencies in the region, health care providers, and nonprofit social service providers, as available, to assist with ensuring appropriate homeless patient discharge. The bill would also require a hospital to maintain a log of homeless patients discharged and the destinations to which they were released after discharge. The bill would specify how its provisions are to be construed in relation to local ordinances, codes, regulations, or orders related to the homeless patient discharge processes, and would exempt state hospitals under the jurisdiction of the State Department of State Hospitals from its provisions. Because a violation of these requirements would be a crime, this bill would impose a state-mandated local program.

Lastly, the Town has allocated HOME ARP funds toward supportive services for the City of Victorville Wellness Center Campus. The Wellness Center Campus will be the first facility of its kind in San Bernardino County and will play a critical role in helping homeless individuals stabilize their lives.

The Campus will provide 170 beds and will allow the Wellness Center to serve several functions by providing a low-barrier emergency shelter, recuperative care facility, medical clinic, interim housing and wrap around supportive services such as case management, care coordination, job training/placement and housing navigation.

#### Discussion

The Town and the Consortium consider ending and preventing homelessness a high priority and will support CDBG funded activities that help prevent homelessness and that provide a structured path to stable housing for individuals and families who become homeless.

#### AP-75 Barriers to Affordable Housing - 91.420, 91.220(j)

#### Introduction

A barrier to affordable housing is a public policy or nongovernmental condition that constrains the development or rehabilitation of affordable housing. Barriers can include land use controls, property taxes, state prevailing wage requirements, environmental protection, cost of land and availability of monetary resources. Barriers to affordable housing are distinguished from impediments to fair housing choice in the sense that barriers are lawful and impediments to fair housing choice are usually unlawful.

Based on information gathered during community meetings, the 2022 Analysis of Impediments to Fair Housing Choice, Consolidated Plan Resident Survey, the 2021-2029 Housing Element and market analysis, the primary barriers to affordable housing in Apple Valley are:

- housing affordability,
- the lack of monetary resources necessary to develop and sustain affordable housing,
- concentrations of racial and ethnic minorities,
- access to opportunities and exposure to adverse community factors, and
- housing issues.

These barriers are interconnected in the sense that demand for affordable housing exceeds the supply, insufficient resources are available to increase the supply of affordable housing resulting in renter households carrying a housing cost burden in excess of 30 percent of AMI and/ or living in areas with low access to opportunities and high exposure to adverse community factors. In the last five years, the elimination of local Redevelopment Agencies by the State of California resulted in the loss of a crucial resource for the development and preservation of affordable housing. While there are mechanisms whereby certain affordable housing assets tied to the former Redevelopment Agencies may be utilized today, these resources are finite and scarce.

According to the 2022 AFH, Apple Valley and Victorville residents in general have relatively low access to high performing schools and employment opportunities, and relatively high exposure to poverty in their neighborhoods. However, in Apple Valley, Black and Hispanic residents (especially those living below the poverty line), residents of Mexican origin, and families with children, are least likely to live in neighborhoods with high performing schools, high labor force participation, and high levels of human capital. While in Victorville Native Americans, particularly those living below the poverty line, appear to be least successful in accessing employment; Asian Pacific Islander residents have slightly less access to public transit and face slightly higher transportation costs; Hispanic residents, residents born in Mexico, and families with children disproportionately reside in racially or ethnically concentrated areas of poverty. As Apple Valley-Victorville populations

continues to change the Consortium should anticipate meeting the needs of a small and increasing proportion of the population with limited English proficiency, an aging population, and an increasingly diverse population.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

To address housing affordability and the lack of monetary resources for affordable housing, this Strategic Plan calls for the investment of a significant portion of CDBG and HOME funds for the development of new and preservation of existing affordable rental housing units over the next five years. Although the Consortium no longer has access to Redevelopment Housing Set-Aside funds, it will continue to leverage CDBG and HOME funds to attract private and other available public resources.

To promote fair housing, the following goals have been established for Apple Valley and Victorville.

Goal	Program Marketing		
Description	Both jurisdictions shall ensure that all HUD-funded programs are marketed in high poverty areas within their jurisdiction in manners that will be accessible to residents to ensure that low-income residents and high poverty neighborhoods have best access to all program activities.		
Goal	Target Non-Housing Activities in Areas of High Poverty		
Description	Both jurisdictions shall use CDBG funds to carry out non-housing activities (such as public works, public services, and economic development) in areas of high poverty. This may include carrying out activities jurisdiction-wide but promoting services in those areas or electing to target activities in these areas.		
Goal	Monitor and Apply for Federal and State Funding to Increase Community Development and Housing Activities		
Description	Both jurisdictions shall actively monitor new funding opportunities for additional community development and affordable housing activities. Unless there is specific justification not to apply, the jurisdictions shall apply for these funding streams.		
Goal	Promote Fair Housing Education for Tenants and Homebuyers		
Description	Both jurisdictions shall fund and promote fair housing training for tenants, homebuyers and potential homebuyers to ensure that residents are fully informed of their rights as it relates to housing.		
Goal	Promote Fair Housing Education for Landlords and Realtors		
Description	Both jurisdictions shall fund and promote fair housing training for landlords and realtors to ensure that they understand the fair housing requirements and rights of tenants and homebuyers.		
Goal	Maintain Fair Housing Resources on Website		
Description	In collaboration with the fair housing provider for the jurisdiction, maintain a page on the jurisdiction website that provides access to fair housing resources and documents. Further, collaborate with the fair housing provider to promote trainings and other fair housing related events.		
Goal	Maintain Housing and Community Development Resources List		
Description	Establish and maintain a list of all housing and community development resources that is updated annually. This list may include services such as grant or loan programs for reasonable modifications and access to programs such as Meals on Wheels.		

#### Discussion

To address housing affordability and the lack of monetary resources for affordable housing, the Consolidated Plan calls for the investment of a significant portion of CDBG and HOME funds for the rehabilitation and preservation of existing affordable housing units over the five (5) years spanning the Consortia's Consolidated Plan. Although the Town no longer has access to Redevelopment Housing Set-Aside funds, the Town will continue to leverage its CDBG and HOME funds to attract private and other available public resources. This strategy will increase the supply of affordable housing and preserve existing affordable housing in the Town.

#### AP-85 Other Actions - 91.420, 91.220(k)

#### Introduction

The Town's and Consortium's planned investment of CDBG and HOME funds through the 2024-2025 AAP will address obstacles to fostering development of and maintaining existing affordable housing; evaluating and reducing lead-based paint hazards; reducing the number of families living in at or below the poverty line; developing institutional structure; and enhanced coordination among collaborative agencies and organizations. Additionally, this section will identify obstacles to meeting underserved populations needs and propose action to overcome those obstacles.

#### Actions planned to address obstacles to meeting underserved needs

The primary obstacles to meeting the underserved needs of low- and moderate-income people include lack of funding from federal, state and other local sources, and the high cost of housing that is not affordable to low-income people. To address this obstacle, at least in part, the Town is investing CDBG funds in local nonprofit organizations to address the public service needs of those who are homeless, at risk of homelessness, or have incomes that are extremely low-, low-, or moderate.

The Town will continue offering financial assistance to low- and moderate-income Apple Valley homeowners using CDBG and HOME funds. The Residential Rehabilitation Program provides financing for home improvements necessary to ensure that residents can continue to live in quality housing that is already affordable to the occupants.

To address underserved needs, the Town is allocating 100 percent of its non-administrative CDBG and HOME funds in 2024-2025 AAP to projects and activities that benefit low- and moderate-income people or people presumed under HUD regulations to be low- and moderate-income.

#### Actions planned to foster and maintain affordable housing

During the 2024-2025 program year, the Town will use CDBG and HOME funds allocated to continue preserving and maintaining existing affordable housing through the Residential Rehabilitation Program. The program anticipates assisting seven (7) low- and moderate-income owners of single-family dwellings.

The Town will continue to participate in the Apple Valley-Victorville HOME Consortium, an effective way of providing more housing resources to residents. To exemplify these efforts, the Town will allocate its portion of CHDO Set-Aside funds to the City of Victorville's National Renaissance Northgate Village Apartments Project which will provide for three (3) roof replacements, and replacements of water heaters and support beams at the complex. The improvements are anticipated to assist approximately 140 households.

In addition, the City of Victorville will be allocating \$230,847 of HOME funds to its Hughes Training and Development Project which will consist of rehabilitating the main house to include a new roof, addressing lead-based paint remediation, and barriers to accessibility. The project will provide transitional housing for homeless individuals, and physical and mentally disabled individuals.

#### Actions planned to reduce lead-based paint hazards

The Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) emphasizes prevention of childhood lead poisoning through housing-based approaches. To reduce lead-based paint hazards, the Town's Residential Rehabilitation Program will conduct lead-based paint testing and risk assessments for each property assisted that was built prior to January 1, 1978 and will incorporate safe work practices or abatement into the scope of work as required to reduce lead-based paint hazards in accordance with 24 CFR Part 35.

#### Actions planned to reduce the number of poverty-level families

The implementation of CDBG and HOME activities meeting the goals established in the Consolidated Plan-Strategic Plan and this AAP will help to reduce the number of poverty-level families by:

- Supporting activities that increase the supply of housing that is affordable to low- and moderate-income households;
- Supporting a continuum of housing and public service programs to prevent and eliminate homelessness;
- Supporting housing preservation programs that ensure low-income households have a safe, decent and appropriate place to live; and
- Supporting public services through various nonprofits funded by CDBG that serve the community's youth, seniors, families, veterans and residents with special needs.

In addition to these local efforts, mainstream state and federal resources also contribute to reducing the number of individuals and families in poverty. Federal programs such as the Earned Income Tax Credit and Head Start provide a pathway out of poverty for families who are ready to pursue employment and educational opportunities. Additionally in California, the primary programs that assist families in poverty are CalWORKS, CalFresh (formerly food stamps) and Medi-Cal. Together these programs provide individuals and families with employment assistance, subsidy for food, medical care, childcare and cash payments to meet basic needs such as housing, nutrition and transportation. Other services are available to assist persons suffering from substance abuse, domestic violence, and mental illness.

#### Actions planned to develop institutional structure

The institutional delivery system in Apple Valley is best represented through the collaboration between local government and an outstanding set of nonprofit organizations that carry out a diverse array of human service programs to enrich the lives of residents. These relationships are collaborative—each organization partnering with the next to ensure that all Apple Valley residents have the support necessary to lead fulfilling lives. Affordable housing development and preservation activities will be carried out by the Town in partnership with housing developers and contractors. Guided by the Strategic Plan, public service activities will be carried out by nonprofit organizations and Town departments to serve low- and moderate-income residents. The Town will collaborate across departments on town-owned public facilities improvements and will partner closely with nonprofit organizations receiving capital improvement funds to ensure their projects are delivered on time, within budget, and in compliance with all federal, state, and local regulations.

Through technical assistance and the annual Notice of Funding Availability process commencing each year, the Town continues to develop and expand local institutional structure by strengthening existing partnerships and leveraging the experience of organizations that previously have not participated in locally administered federal programs to expand the number of program offerings available to residents. The Town consistently funds a variety of high-quality services that address underserved needs in Apple Valley.

### Actions planned to enhance coordination between public and private housing and social service agencies

To enhance coordination between public and private housing and social service agencies, the Town will welcome and encourage the participation of a wide variety of agencies and organizations that deliver housing and supportive services that add value to the lives of low- and moderate-income residents in Apple Valley.

#### Discussion:

In the implementation of the 2024-2025 AAP, the Town will invest CDBG and HOME resources to address obstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

#### AP-90 Program Specific Requirements - 91.420, 91.220(1)(1,2,4)

#### Introduction

In the implementation of programs and activities under the 2024-2025 AAP, the Town will follow all HUD regulations concerning the use of program income, forms of investment, overall low- and moderate-income benefit for the CDBG program.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income:	\$0

#### Other CDBG Requirements

1. The amount of urgent need activities	
2. The estimated percentage of CDBG funds that will be used for activities that benefit	
persons of low and moderate income. Overall Benefit - A consecutive period of one,	
two or three years may be used to determine that a minimum overall benefit of 70% of	
CDBG funds is used to benefit persons of low and moderate income. Specify the years	
covered that include this Annual Action Plan. The Town will meet this requirement over	
the 2022-2023, 2023-2024 and 2024-2025 CDBG program years.	

### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The Town will not use any other forms of investment beyond those identified in Section 92.205.

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Consortium does not currently utilize HOME funds for homebuyer activities but may choose to do so via a Substantial Amendment to the AAP and therefore incorporates the following recapture guidelines.

Housing that is for acquisition by a family must meet the affordability requirements of this paragraph.

- (1) The housing must be single family housing.
- (2) The housing must be modest housing as follows:
- (i) In the case of acquisition of newly constructed housing or standard housing, the housing has a purchase price for the type of single-family housing that does not exceed 95 percent of the median purchase price for the area, as described in paragraph (2)(iii) of this section.
- (ii) In the case of acquisition with rehabilitation, the housing has an estimated value after rehabilitation that does not exceed 95 percent of the median purchase price for the area, described in paragraph (a)(2)(iii) of this section.
- (iii) If a participating jurisdiction intends to use HOME funds for homebuyer assistance or for the rehabilitation of owner-occupied single- family properties, the participating jurisdiction must use the HOME affordable homeownership limits provided by HUD for newly constructed housing and for existing housing. HUD will provide limits for affordable newly constructed housing based on 95 percent of the median purchase price for the area using Federal Housing Administration (FHA) single family mortgage program data for newly constructed housing, with a minimum limit based on 95 percent of the U.S. median purchase price for new construction for nonmetropolitan areas. HUD will provide limits for affordable existing housing based on 95 percent of the median purchase price for the area using Federal FHA single family mortgage program data for existing housing data and other appropriate data that are available nation-wide for sales of existing housing, with a minimum limit based on 95 percent of the state-wide nonmetropolitan area median purchase price using this data.

(3) The housing must be acquired by a homebuyer whose family qualifies as a low-income family, and the housing must be the principal residence of the family throughout the period described in the Affordability Restriction Period table referenced below. In determining the income eligibility of the family, the participating jurisdiction must include the income of all persons living in the housing. The homebuyer must receive housing counseling.

## A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Periods of affordability. The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The per unit amount of HOME funds and the affordability period that they trigger are described in the table below:

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under \$15,000	5
\$15,000 to \$40,000	10
Over \$40,000	15

Table 13 – Affordability Restriction Period

#### Recapture Provision

The Town will incorporate a recapture provision into written agreements and long-term affordability covenants as required by 24 CFR 92.254. The recapture provision ensures that the participating jurisdiction recoups all or a portion of the HOME assistance to the Qualified Homebuyer (a) upon resale of the Home, (b) upon the occurrence of an Event of Default, (c) the housing does not continue to be the principal residence of the family or (d) the housing is leased, subleased, or rented to any third person for the duration of the period of affordability. The period of affordability is based upon the total amount of HOME funds subject to recapture described in the Affordability Restriction Period Table above.

In establishing this provision, the Town is subject to the limitation that when the recapture requirement is triggered by a sale (voluntary or involuntary) of the housing unit, and there are no net proceeds, or the net proceeds are insufficient to repay the HOME investment due, the Town can only recapture a portion of the net proceeds, if any. The amount recaptured will at no time exceed the amount of net proceeds. The net proceeds are the sales price less (a) closing costs, (b) the repayment of the First Mortgage/ Superior Loan Repayment (other than HOME funds), (c) repayment of the Qualified Homebuyer's initial investment in the Home and (d) any increase in value

attributable to Capital Improvements made at the Qualified Homebuyer's documented expense. In the event net proceeds are not sufficient to repay the full amount of the HOME assistance plus enable the Qualified Homebuyer to recover his or her initial investment in the home and documented costs of any Capital Improvements, the Qualified Homebuyer shall share the Net Proceeds with the Town. For the purpose of this provision, "initial investment in the home" shall mean the Qualified Homebuyer's down payment. Share of Net Proceeds shall be calculated as set forth in the following mathematical formulas:

#### http://www.ecfr.gov/graphics/ec12oc91.007.gif

In the event of a mortgage default during the period of affordability, the Town shall have the right of first refusal to purchase the home from the homebuyer before foreclosure and may use additional HOME funds to acquire the housing to preserve the housing's affordability. However, notwithstanding a foreclosure situation, the Town intends to recapture all or some of its HOME funds invested during or at the end of the established affordability period, if practicable. Recaptured HOME funds consist of loan payments (including interest) and/or a loan payoff, upon sale if the assisted owner is no longer residing in the assisted residence or for any other breaches of the agreement with the Town. Recaptured funds may be used for any HOME eligible activity. These recaptured funds are identified in the Town's accounting system by a unique recaptured revenue object number. Any recaptured funds will be used by the Town before any additional HOME funds subject to the regulations found at 24 CFR 92.502.

Should the Qualified Homebuyer sell, transfer or convey the Home to a purchaser prior to the eighth (8th) anniversary of the Delivery Date; or there exists an Event of Default during the same period, the Qualified Homebuyer shall pay the Town an Equity Share as described below. The Equity Share shall be calculated on a pro-rata basis as the ratio of the amount of the HOME assistance to the original sale price of the Home, excluding the sum of the Qualified Homebuyer's initial investment in the Home, reasonable costs of resale and any increase in the value attributable to Capital Improvements made at the Qualified Homebuyer's documented expense, and shall be in addition to the amount owed by the Qualified Homebuyer for repayment of the HOME assistance. At no time shall the Equity Share exceed fifty percent (50%). The Equity Share shall decrease with the Qualified Homebuyer's length of occupancy of the home as follows:

- (a) Years 0 through 2 0% reduction of Equity Share
- (b) Years 3 through 4 50% reduction of Equity Share
- (c) Years 5 through 8 66% reduction of Equity Share
- (d) Years 9 through 15-100% reduction of Equity Share

The minimum Equity Share payment shall be One Thousand Dollars (\$1,000). The Qualified Homebuyer may only refinance the First Mortgage for the purposes of reducing the interest rate and/or the monthly payment. If the Town approves the refinancing of the First Mortgage, written permission shall be provided to the Qualified Homebuyer of such approval, upon receipt of which Qualified Homebuyer may refinance the First Mortgage.

Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The Town does not intend to use HOME funds during the 2024-2025 program year to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Town of Apple Valley - 90 - 2024 Annual Action Plan



# **2024-2025 ANNUAL ACTION PLAN JULY 1, 2024 THROUGH JUNE 30, 2025**

# APPENDIX A Citizen Participation

- Proof of Publication NOFA
- Proof of Publication CDCAC Public Meeting
- Proof of Publication Public Hearing & Adoption
- Summary of Comments Received

Cust Id: 2455 Ad Id: 30976 Sch Id: 92063 Your Control #: 24-25 Public Hearing NOFA (English)

**Apple Valley News** 5737 Kanan Road, Ste. 296 Agoura Hills, CA 91301 (760)-244-0021

Page 1

Town of Apple Valley Housing & Community Developme 14955 Dale Evans Parkway

Apple Valley, CA 92307

#### **Proof of Publication** State of CA, County of SAN BERNARDINO

am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the agent of the printer of the Apple Valley News, a newspaper of general circulation, printed and published weekly and which newspaper has been adjudged a newspaper of general circulation for the City of Apple Valley, by the Superior Court of the County of San Bernardino, State of California, that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and

entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

12/01/23.12/08/23

I certify (or declare) under the penalty of perjury under the laws of the State of California that the following is true and correct. Dated at Apple Valley, CA on

Signature

12/08/2023

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NOTICE OF FUNDING AVAILABILITY (NOFA) YFAR FISCAL 2024-2025 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND INVESTMENT HOME PARTNERSHIP (HOME) **PROGRAMS** 

To All Interested Parties:

The Town of Apple Valley ("Town") will be accepting Year Fiscal 2024-2025 Community **Development Block Grant** (CDBG) and HOME Investment Partnerships (HOMF) Project Application Forms from Town Departments and community organizations funding seekina implement eligible housing, community and economic development projects consistent with CDBG program regulations at 24 CFR Part 570, affordable housing projects consistent with the HOME program regulations at 24 CFR Part 92 and the priority needs of the Town's 2022-2026 FiveYear Consolidated Plan The Town anticipates receiving approximately \$652,733 of CDBG funds and \$911.188 of HOME funds from the U.S. Department of Housing and Urban Development (HUD).

Applications will evaluated against the Town's five (5) Priority Needs included in its 2022-2026 Consolidated Supportive Plan: (1) Services for the homeless and those at risk of homelessness, Services. Human (3) Housing Programs, (4) Accessibility and Mobility (5) Economic Development including employment opportunities.

Proposed projects under the CDBG and HOME programs must benefit lowand moderateincome people. Applicants are advised that information and source documentation on family size, income and HUDrequired demographic data of beneficiaries may be required, subsequent to award, during the term of the contract. The CDBG regulations limit the use of CDBG funds for public services to 15 percent of the final CDBG allocation from HUD, estimated to be \$97,909 for the Town. minimum grant The funding level per public service application selected for funding is \$10,000.

The Town may deviate from the minimum grant

program amount priorities noted above in cases where Council determines it to be in the best interest of the residents of the Town. Applications are evaluated for eligibility HUD based οn regulations and the extent to which the proposed activity meets community needs. Applicants must submit a complete Project Application Form for each project. The Town will use information to this determine if the proposal is eligible for CDBG or HOME funding.

A Mandatory Technical Assistance Workshop will be held on Wednesday. December 13, 2023 from 10:00 a.m. - 12:00 p.m. via Microsoft Teams to explain the application process and answer any questions. Applications for CDBG and HOME funding will be made available on the Town's website

www.applevalley.org effective December 13, 2023. Applications must be delivered to and received by the Housing and Community Development Department, Attn: Silvia Urenda, Town Hall. 14975 Dale Evans

Parkway, Apple Valley,

California no later than

4:30 p.m. on Thursday,

January 25, 2024, to be considered. No Late Applications, Faxes or Postmarks will accepted. Please contact Silvia Urenda, at (760) 240-7000 ext. 7910 or via email SUrenda@applevalley.or g with any questions you may have and to RSVP for the Mandatory Technical Workshop to ensure you receive the invite to the Microsoft Teams meeting.

Those applications Federal and meetina Town eligibility requirements will be provided to the Community Development Citizens Advisorv Committee (CDCAC) for their review and recommendation to the Town Council. The CDCAC is anticipated to conduct a Public Hearing on Thursday, February 15, 2024 to meet to recommendations to be included into the Town's 2024-2025 Annual Action Plan anticipated to be taken to Town Council in April 2024 for approval. After the Town Council considers all public testimony, all eliaible applications, and **CDCAC** recommendations, thev approve will the

2024-2025 Annual Action

Plan including projects approved for CDBG and HOME funds.

**FUNDING** THE DECISIONS OF THE TOWN COUNCIL SHALL BE FINAL.

Cust Id: 2455 Ad Id: 30975 Sch Id: 92061 Your Control #: 24-25 Public Notice NOFA--Spanish

**Apple Valley News** 5737 Kanan Road, Ste. 296 Agoura Hills, CA 91301 (760)-244-0021

Page 1

Town of Apple Valley Housing & Community Developme 14955 Dale Evans Parkway

Apple Valley, CA 92307

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Signature



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AVISO AL PÚBLICO SOBRE DISPONIBILIDAD FONDOS (NOFA) AÑO FISCAL 2024-2025 **PROGRAMA** SUBSIDIOS GLOBALES PARA EL DESARROLLO COMUNITARIO (CDBG)

**PROGRAMA** DF **ASOCIACIÓN** PARA **INVERSIONES** ΕN VIVIENDA (HOME)

A Todas Las Personas Interesadas:

El Avuntamiento de la Ciudad de Apple Valley aceptará los Formularios de Solicitud de Proyecto de Subsidios Globales para el Desarrollo Comunitario (CDBG) y Asociación para Inversiones en Vivienda HOME para el Año Fiscal 2024-2025 por parte de los departamentos del Ayuntamiento y de las organizaciones

comunitarias que buscan fondos para implementar proyectos admisibles de vivienda. desarrollo comunitario y desarrollo económico consistentes con las regulaciones del programa CDBG estipulado en 24 CFR Parte 570, proyectos de viviendas asequibles consistentes con las regulaciones del HOME programa estipulado en 24 CFR

Parte 92 las necesidades prioritarias del Plan Consolidado Quinguenal 2022-2026 del Avuntamiento de la Ciudad. El Ayuntamiento de la Ciudad anticipa recibir aproximadamente \$652,733 de fondos de CDBG y \$911,188 de fondos de HOME por parte del Departamento de Vivienda v Desarrollo Urbano de los Estados Unidos (HUD).

solicitudes Las se evaluarán contra las cinco (5) Necesidades Prioritarias del Ayuntamiento de la Ciudad incluidas en el Plan Consolidado 2022-2026: (1) Servicios de apoyo a Personas sin Hogar y Personas en Riesgo de quedarse sin hogar, (2) Servicios Humanitarios, (3) Programas de Vivienda, (4) la Accesibilidad y Movilidad y (5) Desarrollo Económico Oportunidades de Empleos.

Los proyectos propuestos bajo los programas de CDBG y HOME deben beneficiar a las personas con ingresos bajos y Se moderados. les informa a los solicitantes que la información y la documentación sobre el tamaño de la familia, los ingresos y los datos

demográficos requeridos HUD de beneficiarios pueden ser requeridos luego de la adiudicación durante la vigencia del contrato. Las regulaciones de CDBG limitan el uso de los fondos de CDBG para servicios públicos hasta el 15 por ciento de la asignación final de CDBG provenientes de HUD, la cual se ha estimado que serán \$97,909 para la Ciudad. El nivel mínimo financiación de del subsidio por solicitud de público servicio seleccionado para la financiación es de \$10,000.

El Ayuntamiento de la Ciudad puede desviarse de la cantidad mínima del subsidio o de las prioridades del programa antes mencionadas en los casos en que el Concejo Municipal determine que es en el mejor interés de los residentes de la Ciudad solicitudes evaluadas si reúnen los requisitos necesarios para su admisión según las regulaciones de HUD y el grado en que la actividad propuesta satisface las necesidades de la comunidad. Los solicitantes deben presentar un Formulario de Solicitud de Proyecto completo para cada

FΙ proyecto. Avuntamiento Ciudad utilizará esta información para determinar si la propuesta es admisible para recibir fondos de CDBG o HOME.

Se llevará a cabo un

Taller Técnico Obligatorio el miércoles 13 de diciembre de 2023 de 10:00 a.m. a 12:00 p.m. a través Microsoft de Teams para explicar el proceso de solicitud y responder a cualquiera de las preguntas. Las solicitudes de financiación de CDBG y HOME estarán disponibles en el sitio web de la ciudad www.applevalley.org a partir del 13 de diciembre de 2023. Las solicitudes deben ser entregadas y recibidas por el Departamento de Vivienda y Desarrollo Comunitario, Attn: Silvia Urenda. Town Hall, 14975 Dale Evans, Apple Valley, California no más tarde de las 4:30 p.m. del jueves 25 de enero de 2024 para ser considerada. No se solicitudes aceptarán tardías. faxes 0 matasellos Para más información comuníquese con Silvia Urenda. al (760)240-7000 ext. 7910 o por

correo

electrónico

SUrenda@applevalley.or g con cualquier pregunta que pueda tener y confirme su asistencia al Taller Técnico Obligatorio asegurarse de recibir la invitación a la Microsoft reunión de Teams

Aquellas solicitudes que

con

cumplan requisitos de elegibilidad federales y municipales se proporcionarán al Comité Asesor de Ciudadanos de Desarrollo Comunitario (CDCAC) para revisión. El CDCAC se anticipa a llevará a una Audiencia Pública jueves 15 de febrero de 2024 para reunirse y proporcionar recomendaciones financiación aue se incluirán en el Plan de Desempeño 2024-2025 Ciudad que de la anticipado para se llevará al Ayuntamiento en abril 2024 para su aprobación. Después de que el Concejo Municipal considere todos los testimonios públicos, todas las solicitudes admisibles las recomendaciones de CDCAC, aprobará el Plan Desempeño 2024-2025. incluvendo los proyectos aprobados para los fondos de CDBG y HOME.

LAS DECISIONES DE FINANCIACIÓN DEL CONCE.IO MUNICIAL SERÁN DEFINITIVAS.

Cust Id: 2453 Ad Id: 31571 Sch Id: 93879 Your Control #: 2024-2025 CDBG (ENGLISH)

Apple Valley News 17130 Sequoia Ave., Ste. 204 Hesperia, CA 92345 (760)-244-0021 Page 1 of 1

HANNAH RALEIGH Town of Apple Valley 14975 Dale Evans Pkwy

Apple Valley, CA 92307

Proof of Publication
State of CA, County of SAN BERNARDINO

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101

entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

02/16/24

I certify (or declare) under the penalty of perjury under the laws of the State of California that the following is true and correct. Dated at Apple Valley, CA on

Signature Patricia Holland 02/16/2024

Notice of Public Hearing
Town of Apple Valley
2024-2025 CDBG Public
Service Application
Review

Notice is hereby given that the Town of Apple Valley Community Citizen Development Advisory Committee (CDCAC) will be conducting a public hearing to solicit public comment from interested residents on Thursday, March 7, 2024, at 6:00 pm in the Town Council Chambers.

The purpose of the Public Hearing is to hear and respond to the residents on the proposals or questions concerning housing and community development needs. priority nonhousing community development needs, proposed strategies and actions for affirmatively furthering housing, the development of proposed activities, and a review of program performance. The CDCAC committee will be discussing and recommending funding to this year's applicants for the 2024-2025 Community Development Block Grant funding. Applicants and the public are invited to present brief descriptions of their proposals for funding through the CDBG program. All interested

persons are invited to attend. Please direct any questions regarding this public hearing to Silvia Urenda at (760) 240-7000 ext. 7910 or via email at SUrenda@applevalley.or

Cust Id: 2453 Ad Id: 31572 Sch Id: 93880
Your Control #: 2624-2025 CDBG (SPANISH)

Apple Valley News
17130 Sequoia Ave., Ste. 204
Hesperia, CA 92345
(760)-244-0021
Page 1 of 1

HANNAH RALEIGH Town of Apple Valley 14975 Dale Evans Pkwy

Apple Valley, CA 92307

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101

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02/16/24

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Signature Patricia Holland 02/16/2024

Aviso De Audiencia

Pública
Cuidad De Apple Valley
Departamento de
Desarrollo Comunitario
2024-2025 Revisión De
La Solicitud De Servicio
Público

Por la presente se notifica que el Comité Asesor de Ciudadanos para el Desarrollo Comunitario de Apple Valley (CDCAC) llevará a cabo una audiencia pública para solicitar comentarios públicos de los residentes interesados el jueves 7 de marzo de 2024 a las 6:00 p. m. en las Cámaras del Concejo Municipal.

El propósito de Audiencia Pública es escuchar y responder a los residentes sobre las propuestas o preguntas relacionadas con las necesidades de vivienda y desarrollo comunitario. necesidades prioritarias de desarrollo comunitario habitacional. las estrategias y acciones propuestas para promover afirmativamente una vivienda justa, desarrollo de actividades propuestas, revisión del desempeño del programa, El comité de CDCAC discutirá y recomendará financiamiento a los solicitantes de este año

para el financiamiento de la Community Development Block Grant 2024-2025,

Se invita a los solicitantes y al público a presentar breves descripciones de sus propuestas de financiación a través del programa CDBG. Todas las personas interesadas están invitadas a asistir. Dirija cualquier pregunta sobre esta audiencia pública a Silvia Urenda al (760) 240-7000 ext. 7910 o por correo electrónico a SUrenda@applevalley.or g.

#### NOTICE OF PUBLIC HEARING AND 30-DAY REVIEW PERIOD FOR THE TOWN OF APPLE VALLEY 2024-2025 ONE-YEAR ACTION PLAN

**NOTICE IS HEREBY GIVEN** that the Town of Apple Valley has prepared its draft 2024-2025 One-Year Action Plan that will be presented to the Town Council for approval subsequent to a public hearing to receive comments from interested members of the public on the following date:

DATE: April 23, 2024 TIME: 6:30 p.m.

LOCATION: Town Council Chambers

14955 Dale Evans Parkway, Apple Valley, CA 92307

The draft 2024-2025 One-Year Action Plan will be available for public review and comment for a period of 30 days beginning Friday, March 22, 2024, and ending Tuesday, April 23, 2024. A copy of the latest draft 2024-2025 One-Year Action Plan will be available for public review at the following locations:

• Apple Valley Library: 14901 Dale Evans Parkway

Apple Valley Development Services Building: 14975 Dale Evans Parkway

• Town of Apple Valley Town Clerk's Office: 14955 Dale Evans Parkway

• Website: www.applevalley.org

Questions and written comments regarding the draft 2024-2025 One-Year Action Plan may be addressed to Silvia Urenda, Housing & Community Development Supervisor with the Town of Apple Valley Housing & Community Development Department at 14975 Dale Evans Parkway, Apple Valley, CA 92307. Written comments must be received no later than 5:00 p.m. April 23, 2024. Subsequently, all comments will be summarized and incorporated into the 2024-2025 One-Year Action Plan, as appropriate prior to submission to the U.S. Department of Housing and Urban Development (HUD). Those individuals planning to participate in the public hearing are encouraged to check the Town's website listed above for additional information concerning in-person participation on the day of the public hearing for any updates. For more information, please contact Silvia Urenda at (760) 240-7000 ext. 7910.

#### **BACKGROUND**

The Town of Apple Valley has formed a consortium with the City of Victorville to meet the threshold of obtaining Home Investment Partnerships Program (HOME) entitlement status with HUD. The successful formation of the consortium resulted in an annual allocation of HOME funds to both communities. This action requires the Consortium to prepare a joint Five-Year Consolidated Plan that incorporates community needs assessments and strategies for both jurisdictions into one coherent plan. In addition, the Town is an entitlement community that participates in the Community Development Block Grant (CDBG) Program which also requires the submittal of a Five-Year Consolidated Plan as part of the Town's grant application to HUD. The Five-Year Consolidated Plan was approved and submitted to HUD in 2022. The Five-Year Consolidated Plan establishes a framework of housing, community and economic development priorities for the Consortium's HOME program and the Town's CDBG program over the next five years.

The 2024-2025 One-Year Action Plan represents the Town's third year of the 2022-2026 Five-Year Consolidated Plan. The One-Year Action Plan will appropriate HOME and CDBG funds to specific programs and projects for the 2024-2025 fiscal year. As of the date of this notice, HUD has not yet released the CDBG and HOME annual allocations. For this reason, the Consortium is anticipated to receive \$911,188 in HOME funds and the Town is anticipated to receive \$652,733 in CDBG Entitlement funds.

#### ACCESSIBILITY TO MEETINGS AND DOCUMENTS, EQUAL OPPORTUNITY

It is the intention of the Town to comply with Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act (ADA) of 1990 and the ADA Amendment Act of 2008, the Fair Housing Act, and the Architectural Barriers Act in all respects. If you require public documents in an accessible format, the Town will make reasonable efforts to accommodate your request. If, as an attendee or a participant at this meeting, you will need special assistance beyond what is normally provided, including auxiliary aids or services, the Town will attempt to accommodate you in every reasonable manner. Please contact Silvia Urenda at (760) 240-7000 ext. 7910 at least 48 hours prior to the meeting to inform us of your needs and to determine if the accommodation is feasible.

The Town does not and shall not discriminate on the basis of race, color, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, military status, or other protected class status in any of its activities or operations.

Published in the Daily Press on March 22, 2024 (English and Spanish)

#### AVISO DE AUDIENCIA PÚBLICA Y PERÍODO DE REVISIÓN DE 30 DÍAS AYUNTAMIETO DE LA CIUDAD DE APPLE VALLEY PLAN DE DESEMPEÑO ANUAL (2024-2025)

POR MEDIO DE LA PRESENTE SE NOTIFICA que el Ayuntamiento de la Ciudad de Apple Valley ha preparado el plan preliminar del Plan de Desempeño Anual (2024-2025) el cual será presentado al Concejo Municipal del Ayuntamiento para su aprobación y subsecuentemente a la audiencia pública para recibir comentarios de los miembros interesados del público en la fecha que se indica enseguida:

FECHA: April 23, 2024 HORA: 6:30 P.M.

LUGAR: Cámara del Consejo Municipal

14955 Dale Evans Parkway, Apple Valley, CA 92307

El Plan de Desempeño Anual (2024-2025) estará disponible para revisión pública y comentarios por un período de 30 días comenzando el viernes 22 de marzo de 2024 y terminando el martes 23 de abril de 2024. Una copia de la última actualización del borrador de dicho documento estará disponible para su revisión pública en los siguientes lugares:

Apple Valley Library: 14901 Dale Evans Parkway

Apple Valley Development Services Building: 14975 Dale Evans Parkway

Town of Apple Valley Town Clerk's Office: 14955 Dale Evans Parkway

Website: <a href="https://www.applevalley.org">www.applevalley.org</a>

Preguntas y comentarios por escrito relativos al borrador del Plan de Desempeño 2024-2025, podrán ser dirigidos a Silvia Urenda, supervisora en vivienda y desarrollo comunitario del Ayuntamiento de la Ciudad de Apple Valley, ubicado en el 14975 Dale Evans Parkway, Apple Valley, CA 92307. Comentarios por escrito deberán ser recibidos antes de las 5:00 P.M. el 23 de abril de 2024. Subsecuentemente, todos los comentarios serán resumidos e incorporados en los documentos apropiadamente antes de presentar el Plan de Desempeño Anual (2024-2025) al Departamento de Vivienda y Desarrollo Urbano de los E.U. (HUD, por sus siglas en inglés). Se recomienda a las personas que planean participar en la audiencia pública que consulten el sitio web del Ayuntamiento de la ciudad arriba para obtener información adicional sobre la participación en persona el día de la audiencia pública para cualquier actualización. Para obtener mayor información, comuníquese con Silvia Urenda al (760) 240-7000 ext. 7910.

#### **ANTECEDENTES**

La cuidad de Apple Valley ha formado un consorcio con la Cuidad de Victorville para alcanzar el umbral para obtener Home Investment Partnership Program (HOME) estatua y derecho de HUD. El formacio existosa de consorcio resulta in asignaciones anuales de fondos de parte de HOME para ambas comunidades. Esta acción requiere que el Consorcio prepare un Plan Consolidado de cinco años que incorpore las evaluaciones y estrategias de las necesidades de la comunidad para ambas jurisdicciones en un plan coherente. Adicionalmente, la Ciudad de Apple Valley es una comunidad con derecho a participar en el Programa de Subsidios Globales para el Desarrollo Comunitario (CDBG, por sus siglas en inglés) el cual requiere la presentación de Cinco Años de Plan Consolidado como parte de la solicitud para subsidios que somete el Ayuntamiento a HUD y el cual fue aprobado y sometido a HUD en 2022. El Plan establece un marco de trabajo de prioridades de vivienda, comunidad y desarrollo económico para el programa de CDBG para los siguientes cinco años.

El Plan de Desempeño Anual 2024-2025 representa el tercer año del Plan Consolidado 2022-2026. El Plan de Desempeño Anual asignará fondos de CDBG a programas y proyectos específicos para el Año Fiscal 2024-2025. A la fecha de este aviso, HUD aún no ha publicado las asignaciones anuales de CDBG y HOME. Por esta razón, el Consorcio se espera recibir \$911,188 en fundos de HOME y la ciudad de Apple Valley se espera recibir \$652,733 en fondos federales de CDBG.

#### ACCESIBILIDAD A LAS JUNTAS Y DOCUMENTOS, IGUALDAD DE OPORTUNIDADES

Es la intención del Ayuntamiento cumplir con la Sección 504 de la Ley de Rehabilitación de 1973, según enmendada, la Ley de Americanos con Discapacidades (ADA) de 1990 y la Ley de Enmienda ADA de 2008, la Ley de Vivienda Justa, y la Ley de Barreras Arquitectónicas en todos los aspectos. Si necesita documentos públicos en un formato

accesible, el Ayuntamiento hará todos los esfuerzos razonables para satisfacer su solicitud. Si, como asistente o participante en esta reunión, necesitará asistencia especial más allá de lo que normalmente se proporciona, incluyendo recursos auxiliares o servicios, el Ayuntamiento intentará acomodarlo dentro de todas las maneras razonables. Comuníquese a Silvia Urenda al (760) 240-7000 ext. 7910 por lo menos 48 horas antes de la junta para informarnos de sus necesidades y determinar si el acomodo es factible.

El Ayuntamiento de la ciudad no discrimina y no debería discriminar por motivos de raza, color, religión (credo), género, expresión de género, edad, origen nacional (ascendencia), discapacidad, estado civil, orientación sexual, estado militar u otro estado de clase protegida en cualquiera de sus actividades u operaciones.

Publicado en Daily Press en: March 22, 2024 (Inglés y Español)

#### **Summary of Comments Received**

The Town received the following comments as part of the 2024-2025 Annual Action Plan process. This includes, but is not limited to, comments received during the 30-day public review period and the Public Hearing held on April 23, 2024:

- Inland Fair Housing and Mediation Board Stated that they are thankful for the funding to help with more fair housing concerns in Apple Valley.
- Community Health Action Network Expressed how thankful they are for CDBG.
   The program funds have helped them provide more help for utility assistance for more Apple Valley residents.
- Ruth and Naomi Project, Inc. Expressed that they need the funding to help seniors with meals and other interactions with seniors, do provide food giveaways, and are planning to open another senior home.

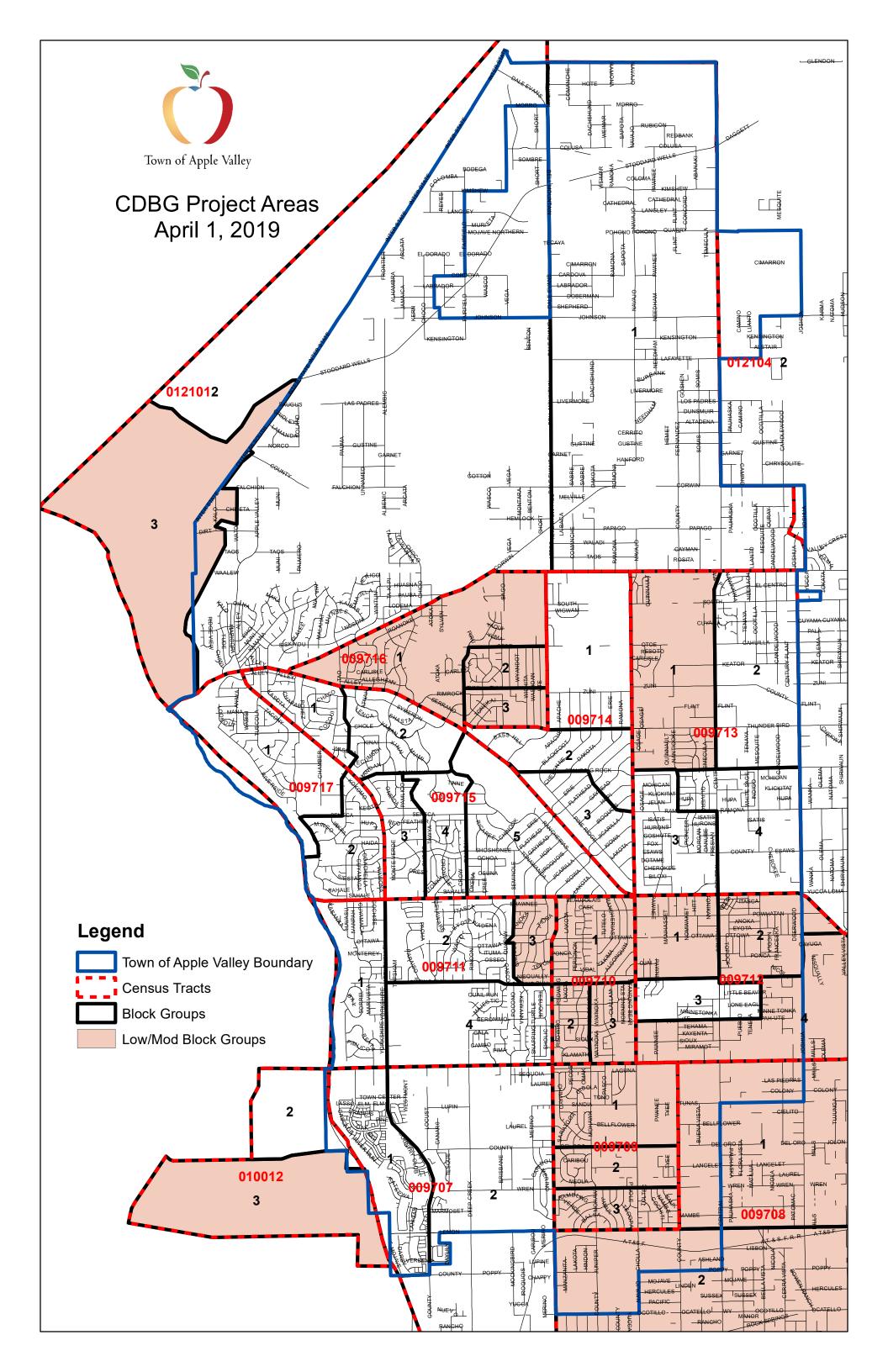
Additional comments will be included upon completion of the Public Hearing.



## **2024-2025 ANNUAL ACTION PLAN JULY 1, 2024 THROUGH JUNE 30, 2025**

# **APPENDIX B Grantee Unique Appendices**

• CDBG Low- and Moderate-Income Area Map





## **2024-2025 ANNUAL ACTION PLAN JULY 1, 2024 THROUGH JUNE 30, 2025**

# APPENDIX C SF-424 and Action Plan Certifications

- SF-424 & SF-424D Community Development Block Grant (CDBG)
- SF-424 & SF-424D HOME Investment Partnerships (HOME)
- 2024-2025 Action Plan Certifications

#### SF-424, SF-424D & Certifications

Upon approval of the Town's 2024-2025 Annual Action Plan, the Town's SF-424 and SF-424D Community Development Block Grant (CDBG) and Home Investment Partnerships (HOME) application and program Certifications will be included in Appendix C prior to the Town's submission to HUD.