Substantial Amendment
Fiscal Year 2021-2022
Annual Action Plan

HOME-ARP Allocation Plan

DRAFT
March 27, 2023

Submitted By:
CITY OF BELLFLOWER, CALIFORNIA

Economic Development Department
Housing and Grants Division
City of Bellflower
16600 Civic Center Drive
Bellflower, California 90706
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City of Bellflower
HOME-ARP
Allocation Plan

Introduction
As part of Section 3205 of the American Rescue Plan Act of 2021 Congress appropriated $5 billion in American Rescue Plan (ARP) funds for homelessness assistance and supportive services administered through the existing Home Investment Partnerships Program (HOME). HOME-ARP funds must be used for one or any of the established eligible activities which include (1) Administration and Planning (subject to 15% cap of allocation), (2) Acquisition, Rehabilitation, & Construction of Affordable Rental Housing, (3) Tenant-Based Rental Assistance (TBRA), (4) Supportive Services, (5) Acquisition and Development of Non-Congregate Shelter, and (6) Nonprofit Operating and Capacity Building Assistance (subject to 10% allocation, among others).

HOME-ARP funds must be used on eligible activities that will benefit individuals or families of specific "qualifying populations" (QP's). Qualifying populations, as defined by HOME-ARP, are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member who also meet one of the criteria (1) to (4) above.

To receive HOME-ARP funds, the City of Bellflower must submit an allocation plan to the U.S. Department of Housing and Urban Development (HUD). As part of the plan, the City must engage in consultation and public participation processes to develop the allocation plan. The complete HOME-ARP plan will be submitted as a substantial amendment to the FY 2021-2022 Annual Action Plan.

The City was allocated $1,301,749 in HOME-ARP funding to be used in accordance with this Allocation Plan.

HOME-ARP Eligible Activities:
1. Administration and Planning Costs;
2. Development of Rental Housing (Acquisition, Rehabilitation, Construction)
3. Development of Non-Congregate Shelter (Acquisition, Rehabilitation, Construction);
4. Tenant-Based Rental Assistance (TBRA);
5. Supportive Services; and
6. Nonprofit Operating and Capacity Building Assistance

Consultation

Before developing its plan, a PJ must consult with the Continuum of Cares (CoCs) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs servicing the jurisdiction.

Summary of Consultation Process

Prior to the development of the HOME-ARP plan, the City of Bellflower consulted with public and private entities to gather the data necessary for the preparation of this Plan. These stakeholders have relevant knowledge that can speak to the needs, service gaps, and potential activities that would best benefit the qualifying populations. The City conducted public outreach beginning December 2022. The engagement efforts included resident and agency surveys.

To solicit feedback, the City of Bellflower created an inventory of all required agencies that needed to be consulted along with points of contact. The City then reached out to all identified organizations and provided them with a link to a survey where they could provide their feedback and input. The survey consisted of questions intended to quantify the perspectives of the consulted agencies and residents regarding the preferred use of the HOME-ARP funds and the gaps in the needs of residents. The below public agencies were contacted via email or phone and were asked to participate in the survey. The City followed up with emails and calls to agencies that did not provide feedback. The City also posted the survey link on their website and social media requesting public input. The City received survey responses from December 7, 2022 until February 3, 2023.

List of Organizations Consulted

<table>
<thead>
<tr>
<th>Agency/Org Consulted</th>
<th>Type of Agency</th>
<th>Methods of Consultation</th>
<th>Feedback Received</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Angeles Homeless Services Authority</td>
<td>Continuum of Care Lead Agency</td>
<td>Agency Sponsored Virtual Session</td>
<td>Acquisitions of affordable housing, master leasing options and supportive services.</td>
</tr>
<tr>
<td>(LAHSA)</td>
<td></td>
<td>Online Survey</td>
<td></td>
</tr>
<tr>
<td>Kingdom Causes</td>
<td>Employment/Homeless</td>
<td>Online Survey</td>
<td>Affordable housing is most needed in the community.</td>
</tr>
<tr>
<td>Service Provider</td>
<td>Service Description</td>
<td>Survey Type</td>
<td>Comment</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------</td>
<td>-------------</td>
<td>---------</td>
</tr>
<tr>
<td>Bellflower</td>
<td>service provider</td>
<td></td>
<td>Tenant Based Rental Assistance (TBRA) needs to be expanded. Homeless individuals are most at need.</td>
</tr>
<tr>
<td>Fair Housing Foundation</td>
<td>Fair housing and civil right service provider Online Survey</td>
<td>Tenant Based Rental Assistance (TBRA) needs to be expanded. Supportive services and the development of affordable housing is most needed.</td>
<td></td>
</tr>
<tr>
<td>Transforming Life Center</td>
<td>Domestic violence support services Online Survey</td>
<td>Affordable housing is most needed in the community as well as supportive services.</td>
<td></td>
</tr>
<tr>
<td>Los Angeles County Developmental Authority (LACDA)</td>
<td>Public housing agency Online Survey</td>
<td>Affordable housing is most needed in the community. Supportive services are needed. Individuals who are homeless and those at-risk of homelessness are most at need.</td>
<td></td>
</tr>
<tr>
<td>People Assisting The Homeless (PATH)</td>
<td>Homelessness Online Survey</td>
<td>Affordable housing is most needed in the community as well as supportive services. Veterans are most at need.</td>
<td></td>
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<tr>
<td>Mercy House: New Hope Shelter</td>
<td>Homelessness/housing Online Survey</td>
<td>Production of affordable housing, TBRA, and supportive services are most needed in the City.</td>
<td></td>
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<tr>
<td>JVS-SOCAL</td>
<td>Veteran service provider Online Survey</td>
<td>Creation of family shelters and providing additional family supportive services.</td>
<td></td>
</tr>
<tr>
<td>U.S. Vets – Patriotic Hall</td>
<td>Veteran service provider Online Survey</td>
<td>Affordable housing is most needed in the community as well as supportive services.</td>
<td></td>
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</table>
**Table 1: Agencies/Organization Consulted**

<table>
<thead>
<tr>
<th>Agency/Monitor</th>
<th>Service Description</th>
<th>Feedback</th>
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<tbody>
<tr>
<td>Veteran Peer Access Network – LA County</td>
<td>Veterans service provider including homeless prevention</td>
<td>Online Survey</td>
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<tr>
<td>Department of Mental Health</td>
<td>Homeless, outreach, veteran, disability service provider</td>
<td>Online Survey</td>
</tr>
</tbody>
</table>

**Summary of Feedback Received**

The feedback received from service providers concluded that development and preservation of affordable housing is a top priority need to address the homeless population in the City. Other identified priorities that followed included Tenant Based Rental Assistance (TBRA), and Supportive Services to address the needs for the qualifying populations. Feedback provided from each organization consulted is shown above in Table 1: Agencies/Organization Consulted.

The Los Angeles County Homeless Services Authority (LAHSA) hosted a virtual session as part of the consultation process and developed a memo where they identified their recommendations for the use of funding. LAHSA noted the top three priorities for use of funds are acquisition of affordable housing, master leasing options, and supportive services.

**Public participation**

- **Date of public notice:** March 10, 2023
- **Public comment period:** March 13, 2023 - March 27, 2023
- **Date of public hearing:** March 27, 2023

**Describe the public participation process:**

The City of Bellflower outreached local service providers currently working with qualifying populations in the City and provided them a survey link to provide their input and feedback on use of HOME-ARP funds. The City followed up via email and phone calls to ensure responses were obtained.

The draft HOME-ARP plan was made available for a 15-day review and comment period starting March 13, 2023 to March 27, 2023 via the City’s website and made available in person with the City Clerk’s office.

The City held a public hearing to hear public comments on the HOME-ARP Allocation plan on March 27, 2023 at 7:00 p.m. in the Council Chambers.
The City published a notice of public comment and hearing in the local newspaper, Los Cerritos Community newspaper. Public notice was also posted at various City locations, City website, and on City social media outlets.

**Describe efforts to broaden public participation:**
To broaden public participation, the City created a survey to gain input and feedback from residents in the community. The City made the public aware of HOME-ARP funds and its available uses. Staff published the link on the City’s website and made multiple social media posts inviting the public to provide their input. The City also reached out to individual agencies to give them an opportunity to participate in the consultation process.

**Summarize the comments and recommendations received throughout the public participation process either in writing, or orally at a public hearing:**
*Public comments will be updated after the meeting.*

**Summarize any comments or recommendations not accepted and state the reason why:**
*Public comments will be updated after the meeting.*

**Needs Assessment and Gaps Analysis**
The Homeless Needs Inventory and Gap Analysis Table below was compiled using data from LAHSA’s 2022 Point In Time Homeless Count for the City of Bellflower and City data from the Continuum of Care (CoC) Housing Inventory Count. In addition, direct consultation with local community partners such as, Kingdom Causes Bellflower and the New Hope Temporary Shelter were conducted. The table demonstrates the City’s need for housing for both families and individuals. Due to the limited availability of data at the City level, homeless population data was broken down using ratios based on the City’s overall homeless count of 175 and LAHSA homeless data for Service Planning Area (SPA) 7, of which Bellflower is a part.
Homeless Needs Inventory and Gap Analysis Table

<table>
<thead>
<tr>
<th></th>
<th>Homeless</th>
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<th></th>
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<td>Current Inventory</td>
<td>Homeless Population</td>
<td>Gap Analysis</td>
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<td></td>
<td>Family</td>
<td>Adults Only</td>
<td>Vets</td>
<td>Family HH (at least 1 child)</td>
<td>Adult HH (w/o child)</td>
<td>Vets</td>
<td>Victims of DV</td>
<td>Family</td>
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<tr>
<td></td>
<td># of Beds</td>
<td># of Units</td>
<td># of Beds</td>
<td># of Units</td>
<td># of Beds</td>
<td># of Units</td>
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<td>Permanent Supportive Housing</td>
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<td>Other Permanent Housing</td>
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<td>Sheltered Homeless</td>
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<td>Unsheltered Homeless</td>
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<td>124</td>
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<td>9</td>
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<tr>
<td><strong>Current Gap</strong></td>
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<td></td>
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<td>7</td>
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</tbody>
</table>

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

Homeless as defined in 24 CFR 91.5

The lead agency of the Los Angeles Continuum of Care (CoC) is the Los Angeles Homeless Services Authority (LAHSA). LAHSA is responsible for conducting annual Point in Time (PIT) counts which counts the number of people experiencing homelessness throughout Los Angeles County on a certain night. Information is provided at different levels including Countywide, Supervisory Districts, Service Planning Areas (SPA), and City. The annual 2022 PIT determined there 175 persons experiencing homelessness in the City of Bellflower.

The majority of the 175 people experiencing homelessness are categorized as unsheltered (109 persons), with 66 persons categorized as sheltered. Of the 66 persons sheltered, 45 persons are in Emergency Shelters and 21 persons in Transitional Housing. Of the 109 persons categorized as unsheltered, 75% or 82 persons are on the streets, 8 (7.3%) in cars, 3 (2.3%) in vans, 11 (9.7%) in RVs, and 6 (5.7%) in makeshift shelters.
At Risk of Homelessness as defined in 24 CFR 91.5
Households at risk of homelessness are those with incomes at or below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days, or
- Are doubled up with another household due to economic hardships, or
- Will be evicted within 21 days, or
- Live in a hotel or motel without financial assistance from a nonprofit or government entity, or
- Live in an efficiency apartment and are overcrowded, or
- Are exiting a publicly funded institution or system of care.

The HUD Comprehensive Housing Affordability Strategy (CHAS) 2015-2019 data provides information on overcrowding among households that include more than one family, by household income level. The CHAS data indicated that there are approximately 4,315 renter households and 1,005 owner households with income at or below 30% AMI; this means that there is a total of 5,320 households at risk of homelessness in the City.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice
Information breakdown about persons experiencing or fleeing domestic violence was not available at the City level, therefore the City is using rations based on the City’s homeless count of 175 and LAHSA homeless data for SPA 7, which Bellflower is part of to determine demographics of this population.

Bellflower’s homeless population accounts for about 3.7% of SPA 7’s homeless populations of 4,781. In SPA 7 there are about 1,497 (sheltered and unsheltered) persons who have experienced domestic or intimate partner violence. Using the 3.7% ratio this means that in Bellflower, there are about 55 people who have experienced domestic or intimate partner violence.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice
Other populations, as defined by HOME-ARP, include those who:

- Are currently housed and at risk of repeat homelessness;
- Have incomes below 30% AMI and are experiencing severe housing cost burden; and
- Otherwise meet the definition of at risk of homelessness and have incomes between 30% and 50% AMI

The LAHSA PIT indicated that about 11% of individuals exiting emergency shelters, or transitional or permanent housing, will return to homelessness within 12 months of any given year.

The 2015-2019 CHAS data indicates that there are 4,315 renter households with an annual income at or
below 30% AMI, which are at greater risk of housing instability.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The City of Bellflower does have a local homeless shelter, New Hope Temporary Shelter, which provides beds for up to 50 adults, however, there is still an estimated need for an additional 49 beds in the City. Although the City does have an estimated 7 families in need of housing, it does not currently have an inventory of housing options readily available to offer for families. This is a significant gap in the City, and therefore the City has to outsource housing services to County-wide services. This poses another potential barrier for families, as they would then need to travel outside of the City to seek housing services.

Overall, the City has an unmet need of 56 beds for persons experiencing homelessness.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice.

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. Cost burden: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceeds 30% of monthly income.
2. Overcrowding: A household is overcrowded if there is more than one person per room, not including kitchens and bathrooms.
3. Lack of complete kitchen facilities: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
4. Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped running water, a flush toilet, or a bathtub or shower.

HUD also defines four sever housing problems including:

1. Severe cost burden: more than 50% of monthly household income is spent on housing costs.
2. Severe overcrowding: more than 1.5 people per room, not including kitchens or bathrooms.
3. Lack of complete kitchen facilities as previously described above
4. Lack of complete plumbing facilities.
Identify priority needs for qualifying populations:
The highest priority need for the qualifying populations is the availability of affordable rental housing options in the City of Bellflower. As noted in earlier sections, the City has a bed gap of 56, as they currently have 119 beds available but a homeless population of 175. About one third of the available beds are emergency shelter beds. Increasing the availability of affordable rental housing options in the City would provide long-term housing options to the qualifying populations.

Additionally, according to the most recent 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, there are 9,870 low-income households, below 80% AMI, that experience cost burdens in the City of Bellflower. Increased cost burdens along with rising inflation costs can put low-income renters at higher risk of homelessness. Other housing issues may increase the risk of people becoming homeless include being low-or-extremely low, earning 50% or 30% or less AMI, and/or living in substandard or overcrowded conditions. In Bellflower there are 8,300 households earning 50% of AMI or below, have severe housing problems, which may include lacking a kitchen or complete plumbing, severe overcrowding, or severe cost burden. By developing affordable rental housing in the City, the City also expands on the availability of affordable housing options for those who are at risk of homelessness because of their current cost-burdens or other severe housing problems. Providing housing of this type prevents at-risk families in unstable housing situations from becoming homeless, and thus preserves available emergency shelter and transitional housing options for the homeless households who most need them.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:
The City used multiple data sources to determine the housing and service needs of the qualifying populations. Below is a list of the sources along with a summary of how that data source was used as part of the plan:

- Los Angeles Homeless Service Authority 2022 Point in Time Homeless Count
  - Information was used to determine the homeless population in the City and their current living situations.
  - Information was also used from the Service Planning Area 7 (SPA 7) to determine ratios for categorized data.
- Comprehensive Housing Affordability Strategy (CHAS) Data
  - CHAS data was used to review housing problems and needs for low-income populations.
- Continuum of Care (CoC) Homeless Assistance Programs Housing Inventory Count Report
  - This data was used to review the availability of beds and units available in the City.
- Consultation with Stakeholders and Service providers
A key piece of data that informed the identification of priority need for the qualifying populations included the consultations with key stakeholders and service providers already working with qualifying populations. Via the consultation process stakeholders, including LAHSA, identified development and preservation of affordable housing as a top priority need to address homelessness.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:
The City has been in talks with a local CHDO who is interested in working with the City to develop permanent supportive affordable housing. The City may solicit applications from developers for the development of affordable rental housing. If needed, a Notice of Funds Available (NOFA) or a Request for Proposals (RFP) may be issued. The NOFA and RFP, at a minimum, will specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

Describe whether the PJ will administer eligible activities directly:
The City will administer its HOME-ARP funds directly, maintaining responsibility for project selection and compliance with all HOME-ARP guidelines.

If any portion of the PJ’s HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:
Not applicable. The City will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.
Use of HOME-ARP Funding

<table>
<thead>
<tr>
<th>Use of Funds</th>
<th>Funding Amount</th>
<th>Percent of Grant</th>
<th>Statutory Limit</th>
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<tbody>
<tr>
<td>Supportive Services</td>
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<td></td>
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<tr>
<td>Acquisition and Development of Non-Congregate Shelters</td>
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<tr>
<td>Tenant Based Rental Assistance (TBRA)</td>
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<tr>
<td>Development of Affordable Rental Housing</td>
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<tr>
<td>Non-Profit Operating</td>
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<tr>
<td>Non-Profit Capacity Building</td>
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<td>5%</td>
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<tr>
<td>Administration and Planning</td>
<td>$196,462</td>
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<tr>
<td><strong>Total HOME ARP Allocation</strong></td>
<td>$1,309,749</td>
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</tr>
</tbody>
</table>

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Bases on the analysis completed as part of the development of its HOME-ARP plan, the City will distribute its funds to two activities: administration and planning, and the development of affordable rental housing. The City will use the allowable 15% ($196,462) limit for administration and planning of the HOME-ARP plan and activities and will allocate the remaining 85% ($1,309,749) towards the development of affordable rental housing.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Analysis of Comprehensive Housing Affordability Strategy (CHAS) data and input from stakeholders say that availability of affordable housing is a great need in the City of Bellflower. A total of 9,870 low-income households (below 80% AMI) in Bellflower experience cost burdens, spending more than 30% of their incomes on housing costs. In Bellflower there are also 8,300 households earning 50% of AMI or below who have severe housing problems, which may include lacking a kitchen or complete plumbing, severe overcrowding, or severe cost burdens. By developing Permanent Supportive Housing in the City,
the City also expands on the availability of affordable housing options for those who are at risk of homelessness because of their current cost-burdens or other severe housing problems.

Comparison of LAHSA’s PIT count from 2020 to 2022 shows that the homeless population in the City has decreased drastically from 242 in 2020, to 175 in 2022. This increase of more people becoming sheltered can be an outcome of the newly opened temporary homeless shelter in the City. The City, however, still has a housing gap of 56 beds in the number of emergency shelter, transitional housing, and permanent housing beds available to homeless adults. However, because the data shows that the existing homeless services are making an impact to the homeless population in the City, the City is focusing on long-term options that will help continue to increase housing stability for City residents.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Based on the needs assessment and analysis of gaps with the current system for meeting homeless and supportive service needs, the City is looking to allocate its HOME-ARP funds towards the development of affordable rental housing. The City is still in the planning phases of the project and looking for possible locations, but based on the HUD Housing Production Goal Calculation Worksheet it is estimated that at least 7 affordable units will be produced.

Preferences, Prioritization, & Limitations

The city of Bellflower does not intend to provide preferences prioritizations or limitations to any population or subpopulation.

HOME-ARP Refinancing Guidelines

The City of Bellflower will not use HOME-ARP funds to refinance existing debt and therefore will not establish any HOME-ARP refinancing guidelines in this plan.