

Appendix H

Public Comments and Con Plan Consultation Meeting Summary

Consolidated Plan Consultation Meeting: Comment Summary and Response

January 25, 2015

Q: What types of housing problems are of greatest concern to your agency

Responses varied depending on whether the person representing the agency was primarily developing rental or homeowner housing, or whether the agency was focused on service to a particular special needs population.

Q: Areas for Program Improvement

Rental Housing Development

Participants discussed the difficulty of targeting 40% or more of the units to homeless populations (MHP Supportive Housing Requirement) for projects in rural areas. Reasons included difficulty in making projects pencil in rural areas due to already low required rents compared to urban areas; (going below 40% AMI is hard in rural areas); the local unpopularity of concentrating high percentages of some Extremely-Low-Income target populations, and the lack of adequate services infrastructure in rural areas to support providing services to some populations.. Other participants expressed difficulty in mixing target populations.

Need for ongoing rental subsidy for ELI units discussed; need for more CoC or services funding in rural areas. Wished HOME was permitted to fund a capitalized operating subsidy like MHSA; especially if other capital sources will be driving developers toward serving more chronically homeless.

Suggested offering \$5,000,000 HOME rental project loans to every HOME applicant serving a special needs/ELI population; rather than just making \$5,000,000 loans available to projects that reduced or eliminated private debt.

HOME will consider increasing the maximum HOME loan amount in this manner as the State's HOME allocation increases over time, or there is another funding source available to support higher concentrations of ELI units.

Participants requested that projects be able to not include tenant electric utility costs in the completion of the fields within the UA calculator to account for project use of solar or other energy efficiency features which reduce tenant electricity cost. In some cases savings may be going back to the grid only, and not individual tenants.

HOME will investigate this as it applies to use of the HUD calculator.

Participants requested that HOME provide incentives for projects putting things, such as solar panels or greywater systems on their structures, even if HOME cannot pay for these systems. Some concern was expressed that greywater systems are cost-prohibitive for multifamily developments, and that more TA is needed to assist multifamily developers in how to install these and other energy efficiency features more cost effectively (California Housing Partnership Corporation has a working group on this issue.)

HOME will investigate this for future funding rounds.

Homeownership activities

Participants noted that CDBG and CalHOME are more flexible/easier to spend than HOME for these activities, due to higher sales price limits or higher “activity delivery” percentage permitted to pay for staff costs per project.

HOME currently does not have enough data to warrant increasing the activity delivery allowance; per unit subsidy limits are established by HUD.

Local jurisdiction capacity issues discussed loss of Redevelopment Agency funds has impacted capacity/staffing at the local level. Participants noted need to find more administrative subcontractors willing to administer local TBRA programs so that TBRA could be used for more Rapid Rehousing programs, or as bridge funding to longer-term rental assistance.

Participants appreciated the amount of direct TA that CDBG was providing to individual jurisdictions and their administrative subcontractors; State training/clarification around the roles and responsibilities of the jurisdiction versus their administrative subcontractor is particularly important. Joint trainings of the jurisdiction and the administrative subcontractor particular to the problems they may be having with a particular contract or activity is also important. Suggested more “off-the-shelf” training around federal overlay requirements common to both CDBG and HOME.

Group discussed what items count toward ADC, (are project-specific); what counts as an administrative cost, and what should be charged to the homeowner. Participants suggested that plans and permits on a single-family reconstruction should be charged to the homeowner, or ADC should be increased for the local jurisdiction/developer to cover these costs.

Programs will take this recommendation under advisement for the future if the demand for reconstructions increases among multiple developers/administrative subcontractors, and we receive data to document the actual costs.

Encouraging more (1-4 unit) rental rehabilitation projects was discussed. Not sure of advantage to property owner of rent-restricting their units. (Can they still pay their mortgage?)

Programs should consider allowing improvements such as fire sprinklers/fire safety to be made in the form of a grant versus having the cost included in the loan amount. (Requires State HOME Regulation change).

HOME will take these proposals under consideration.

Application Scoring Issues

CDBG discussed moving toward a more objective self-scoring system for Public Services funds.

Suggestion made to consider comparing project Census Tract data to City Census Tract data, rather than County-wide data in determining whether a HOME project is located in an area of minority concentration.

HUD FHEO advises against this because it will allow more projects to qualify as “non-concentrated” because the city itself might have high areas of minority concentration, whereas the county does not.

Comments Received via Electronic Mail

1) **From:** Robert Chaparro [<mailto:rchaparro67@gmail.com>]

Sent: Monday, March 30, 2015 11:17 AM

To: CAPER Comments@HCD

Subject: Re: Public Notice For Comment (Draft 2015-2020 State Of California Consolidated Plan)

My comment begins with a formal demand that the HCD immediately stop violating County, State and Federal anti-discrimination and equal rights laws that determine who qualifies for Public Housing, Section 8, etc... Or eventually face federal civil court actions.

Begin to use (imminent domain) laws, if necessary, to take over apartment properties and begin to house the numerous amounts of people that have been on housing waiting lists for months and years and begin to reduce and eventually eliminate the waiting lists process.

Make it illegal, under anti-discrimination laws, for all and any apartment owner, for any reason, to refuse public housing and section 8 recipients, so that county, state and federal housing agencies can begin to immediately start to house people and families who are on the different

types of housing waiting lists.

Eliminate the preferential treatment of the seniors first, families second, ...single childless men, last on all the different county, state and federal housing waiting lists. The housing of people and families should be conducted on a first come, first serve basis and nothing else!

It is ridiculous and inhumane that the majority of housing agencies are not accepting applications for housing and waiting lists are closed, especially considering the amount of homeless people that are waiting for housing on those lists.

I hope to immediately begin to see these abovementioned comments implemented into the HCD 2015-2020 Consolidated Plan.

Sincerely,
Robert Chaparro

Response: The programs covered by the State's Consolidated Plan do not have authority to administer public housing resources; however, the State appreciates the concerns expressed by the commenter. The State will continue to direct resources to expand the supply of affordable housing so that households in need of rental assistance have more opportunities to utilize this assistance as it becomes available.

2) **From:** Miguel Fernandez [<mailto:mfernandez@AllianceHH.org>]

Sent: Monday, March 30, 2015 11:53 AM

To: CAPER Comments@HCD

Subject: Public Comment: Draft 2015-2020 State of California Consolidated Plan

The following are my comments regarding the State's 2015-2020 Consolidated Plan and its contracting and distribution of funds.

In its contracting of services, I would suggest the State consider requesting a consolidated proposal for eligible jurisdictions within a County rather than separate proposals. For example:

Los Angeles County has 32 eligible cities within its boundaries for ESG funding. It would make much more sense to issue one RFP for the provision of services within the 32 eligible cities rather than request a proposal for each eligible city separately. Funding is already limited, dividing it further only leads to negligible amounts that discourage organizations from submitting a proposal.

In addition, having to submit multiple proposals for the same program that serves individuals from different eligible areas is a waste of time and money.

Releasing one RFP that allows for the provision of services across multiple eligible jurisdictions in a County would be a lot more efficient and effective way of allocating limited resources.

Miguel A. Fernandez, MS

Housing Research Analyst

Alliance for Housing and Healing

Aid For AIDS | The Serra Project

825 Colorado Blvd., Suite 100

Los Angeles, CA 90041

TEL: 323-344-4896

FAX: 323-344-4894

EMAIL: mfernandez@alliancehh.org



**Alliance for
Housing and
Healing**

Response: Where currently permitted by HUD, the State either allows, or is considering changes to its program requirements to allow, eligible applicants to submit applications for services which will cover a multi-jurisdictional area. For example, the State CDBG program currently permits its eligible applicants (cities and counties) to submit an application for activities covering multiple eligible jurisdictions. The State HOME Program currently allows tenant-based rental assistance secured under a single application to be provided to all State HOME-eligible jurisdictions within a county. The State HOPWA program does not prohibit service providers from submitting a single application to provide services in multiple eligible cities within an eligible county, and the State ESG program is considering changes to its program to permit and encourage applications covering a multi-city or multi-county area. Note: eligibility in all of these programs is currently limited to geographic areas that are not eligible to receive these funds directly from HUD or their county (nonentitlement areas). See Appendix A for more information.

Comment: Comment letters on the draft Annual Plan were received from the following tribal entities throughout the State:

- Nevada California Indian Housing Association
- Northern Circle Indian Housing Authority
- United Native Housing Development Corporation
- Hoopa Valley Housing Authority
- All Mission Indian Housing Authority
- Karuk Tribe Housing Authority
- Sherwood Valley Band of Pomo Indians
- Guidiville Indian Rancheria.

These entities expressed a desire to work with the Department to ensure “remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to the Department on Native housing needs and solutions ...”

Commenters stated the draft Consolidated Plan “reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. The letters identify key area of concern with the aim of strengthening the plan as follows:

- Engage Native American Tribes and organizations to provide input and guidance in incorporating tribal housing needs into the State plan.
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit.
- Incorporate within the Market Analysis section a tribal sub-market housing analysis to the distinct Native context, processes and conditions under which tribal housing is provided.
- Identify how the current structure of State housing programs act as policy impediments to tribal access to badly needed affordable housing resources.
- Require housing elements, RHNA and other relevant local and regional planning processes to engage tribes and incorporate tribally generated data into the processes.
- Establish carefully targeted tribal housing goals that are aligned with dedicated resource and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of State housing programs by tribes during the Plan’s duration and make adjustments as needed.

Response: Over the past year, HCD has conducted outreach meetings, site visits and listening sessions with the Native American community and is actively supporting Native American participation in the consultations related to the development of the Department’s Statewide Housing Plan and new funding programs. The Department has committed to quarterly meetings with statewide tribal organizations to review and assess constraints and opportunities within the State’s housing efforts. As part of that effort, the Department in the process of developing a Tribal Housing Needs Assessment to both collect data and conduct further tribal outreach to comprehensively evaluate housing issues for tribal lands and tribal populations. This Assessment will be used to propose policy and programmatic recommendations for incorporation into the Statewide Housing Plan and Department activities. The goals of the Assessment will be to quantify and evaluate past tribal utilization of Department programs and analyze the extent to which standard, federal and state-mandated housing planning processes can incorporate, account for and respond to tribal affordable housing needs. To the extent available and appropriate, upon conclusion of the Assessment, the Department is committed to incorporating information, recommendations and outcomes in future Consolidated, Annual Plan, CAPER and Statewide Housing Plan updates.



NEVADA/CALIFORNIA INDIAN HOUSING ASSOCIATION

www.nv-cal.org

April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

Nevada California Indian Housing Association is formed under a Joint Powers Agreement among Tribes and Tribally Designated Housing Entities and Indian Housing Authorities. The Association is a non-profit association of Indian tribal governments and political subdivisions of Indian tribal governments and is not organized for the private gain of any person. It is organized for charitable purposes. The specific purposes for which this association is organized are to promote the interests of Indian tribes, tribally designated housing entities and Indian housing authorities in their efforts to provide low income housing to Indians and within Indian country, to facilitate the exchange of information about Indian housing related matters among these entities, and to provide education and training opportunities for these entities.

In providing comments on the State's Draft Consolidated Plan, the Nevada-California Indian Housing Association (NEV-CAL) first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year

history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

It is in this spirit of cooperation that NEV-CAL would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, NEV-CAL's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in Incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNAs and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Tribal Housing Needs Invisible: The Draft Plan as a whole and in specific sections recognizes the full spectrum of relevant government and public entities such as cities, counties, colonials and public housing authorities, establishes corresponding goals that direct programmatic activity and funding. By contrast, California's Federally Recognized Indian Tribes and Native population are completely absent in virtually every section of the document. Even though almost one fifth of the United States' Federally Recognized Indian Tribes are located in California and the state has the largest Native American population in the country, the term "Federally Recognized Indian Tribe" never once appears in the document.

This invisibility is a reflection of the cultural, institutional and historical barriers and isolation of Native Americans in the state. Tribes in California are small, generally located in rural areas or on the urban-rural fringe of small cities. Their governmental and social structures are an imposed hybrid of an imposed outside municipal-style government interwoven with traditional values, social relationships and informal leadership and governance systems.

But, while tribes do perform certain "municipal" functions, neither are they the equivalent of miniature cities, special service districts or nonprofit/mission driven organizations. Rather, tribes are organized based on a documented history of pre-conquest social and political organization as determined by the Bureau of Indian Affairs. Tribal relations between state and federal governments are between sovereignties and governed by federal treaties and laws.

These relationships entail obligations upon the part of the federal government to provide financial resources, services and legal protections sufficient for the tribe to maintain a viable homeland for tribal members including the requisite tribal government, as well as departments to provide housing, health services and facilities, and other community services. As such, tribes are charged with, among other vital functions, providing decent, safe and affordable housing for their members. However, unless tribes receive sufficient funding they are unable to fully perform these functions. Because tribal needs have historically been drastically underfunded, tribal communities throughout California are unable to provide the full range of housing and municipal functions that would be expected from a municipality.

Unique Characteristics of Native Housing Markets: While the Draft Plan provides good data on overall housing market conditions that drive statewide shortages of affordable housing, Native American housing markets are quite different. As sovereign nations, tribes must serve the membership that makes up their nation. Their housing responsibilities are to tribal membership as a whole, although resources are prioritized based on income criteria. It cannot be emphasized enough that, unlike housing authorities or nonprofit developers, tribes do not just serve a needs-based population or housing market segment such as low-income families or disabled persons. Instead, tribes must work with their membership as they are and where they are. They cannot easily pick and choose the most desirable tenants as many affordable housing providers do. Further they must do it based on the tribe's geographical location, land base and homeland. And these location factors are not the result of choice but forced termination, relocation and displacement with little regard for the desirability, location characteristics, economic potential or sufficient acreage to house tribal members.

Tribal Inability to Provide Adequate Housing: there are widespread misconceptions of tribal housing conditions and how housing needs are met. The core misperception is that tribes

provide or offer housing for all of their members on reservations or Rancherias. A corollary misconception is that sufficient funding is available through special Indian funding sources to largely cover the cost of maintaining and expanding the tribal housing stock. Consequently, Indian housing needs seem invisible and the sole responsibility of tribal governments distinctly separate from city and county government. The fact housing elements typically ignore Indian housing needs is indicative of this attitude.

The reality could not be more different. Only a very few tribes – usually the most successful gaming tribes - can house all or even most of their members on Rancherias or Reservations. Tribes typically struggle to maintain their existing stock of housing and lack sufficient funding to add much new housing. Waiting lists are long for the limited supply of reservation housing and many tribes provide rental support for their most needy members to live off-reservation, while other households use their limited resources to rent off-reservation housing that is often substandard, overcrowded and/or unaffordable.

Disadvantageous Characteristics of California Tribes: California is largely made up of small tribes in terms of population and land base. Unlike large tribes in other states, such as the Hopi or Navajo, with large populations, natural or recreational resources and large tracts of land, many California tribes have little potential for the kind of economic development that would support large housing projects or providing a full range of services. The small populations of most California tribes prevent them from achieving these kinds of efficiencies of scale that underlie more cost effective strategies for housing.

According to a survey undertaken by the California Coalition for Rural Housing Survey on behalf of the Nevada-California Indian Housing Association, it was found that many tribes lack readily developable land for housing. Often much, if not all, of the land is not suitable for any development. Other land that could be developed for housing lacks infrastructure. In some cases, tribal land bases are completely built out and will require the purchase of new lands to develop housing and related facilities. Nine tribes in California are completely landless and are struggling to acquire land to establish a tribal homeland. It should be noted that acquiring private land to develop new housing to put into tribal trust is not a simple or quick process and can be contested by local government and communities.

As the CCRH survey confirmed, California tribes are typically rural. Many are located in remote locations and lack access to basic retail, grocery stores, schools and other services and amenities. Consequently, most tribal economies are underdeveloped and generate little in the way of economic revenues that could be used for housing or other kinds of development. It should also be noted that while a few tribes have been very successful with casinos, the gaming market has become more competitive and saturated with many casinos generating little in the way of profits or revenues. While there are distributions of gaming revenues to nongaming tribes, these revenues are a fixed amount and are used for a broad range of services including base support of tribal governments, social services, and distributions to tribal members. These funds are based on the original California Compacts and may not be available as gaming tribes re-negotiate their agreements with the State. While these funds have helped tribes meet some social and housing needs, they are not at levels sufficient to have an overall decisive impact.

Federal Funding Disadvantages: The small populations of California's tribes greatly disadvantage them in accessing and utilizing the primary Indian Housing funding programs. The Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA) reorganized the system of housing assistance provided to Native Americans through the Department of Housing and Urban Development by consolidating programs into a formula based Indian Housing Block Grant (IHBG) and a Title VI Loan Guarantee which provides financing guarantees to Indian tribes for private market loans by allowing them to pledge future IHBG funds as security to develop affordable housing. Unfortunately, IHDG funding levels have never been close to meeting Indian housing needs. The inadequate funding of IHBG undermines the Title VI program because many tribes cannot divert IHBG funds to secure private sector loans. Compounding this problem, the formulas used to allocate IHBG funds favor tribes with large population bases, such as the Navajo or Sioux. While large tribes such as these might receive annual IHBG allocations in the millions of dollars, the much smaller tribes of California may receive IHBG allocations of just a hundred thousand dollars or so to operate and maintain their existing housing. This very small amount of money must cover all expenses related to housing such as staff salaries, repairs, supplies, administration and new construction. By scrimping and saving small amounts of IHBG funds and perhaps securing a highly competitive Indian Community Development Block Grant – which are capped at \$605,000 per award – tribes can sometimes slowly build a small number of homes every few years. This piecemeal, small scale style of development is economically inefficient and, for the vast majority of tribes, will never enable them to catch up with housing need.

State Housing Programs and Policies are the Major Impediments: Despite the urgent need for affordable tribal housing, tribes have had great difficulty utilizing state funding sources. Mainstay state affordable housing programs rarely make awards to tribes. Only one HOME funding award has ever been made to a tribal housing organization and no tribal housing has been developed through the HOME program since the turn of the century. The Multifamily Housing Program has never made an award to a tribal housing project. Federally Recognized Indian Tribes are ineligible for CDBG funding. Even programs that should be able to assist individual tribal households such as First Time Homebuyer Programs or Homeowner Rehabilitation Loans are underutilized. State agencies conduct little outreach to tribes to encourage utilization of state resources and gather information on tribal housing needs. Much of the problem lies in the structure of the programs themselves. Affordable housing programs are designed for conventional nonprofit housing corporations, profit motivated developers and public housing authorities building housing on fee simple land. Standard public review and approval processes, documentation, appraisals, title reports, market studies and other documents are designed with more conventional development in mind. Programs typically don't have tribal equivalents or adaptations of these processes and documentation available. Often program eligibility language is the culprit because it does not clearly establish tribal eligibility.

Tribes Excluded From Key Planning Processes: Critical planning process that guide the deployment of state and local government housing resources exclude tribes. City and county housing elements typically do not address tribal housing conditions because they are seen as outside the scope and objectives of the general planning process – even though many local tribal

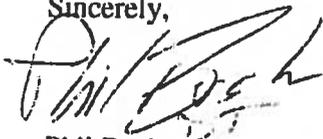
households live off-reservation due to the tribe's inability to provide housing on tribal land. As far as we can determine, tribal housing needs are never considered in the Regional Housing Needs Assessments. Nor is it very likely that tribal representatives participate in regional planning organizations such as COGs.

The message we want to portray to State HCD is that there exists historical, cultural, economic, political and programmatic barriers that have prohibited Tribes from participating in the many programs and services provided by State HCD and other State agencies and now is the time to begin to address these issues and include tribes in all aspects of the consolidated plan that will facilitate access to much needed resources and services to underserved Tribal communities in California.

Do not hesitate to contact me at 530.596.4127 or 530.249.2874 to further discuss any aspect of this correspondence.

Thank you for the opportunity to include our comments in the Public Comment process.

Sincerely,



Phil Bush,
Chairman
Nevada California Indian Housing Association
401 Peninsula Drive, Suite
Lake Almanor, CA 96137
modoclasseniha@thegrid.net

Cc: Mervin Hess, Vice Chairman
Lee Ann Brown, Secretary
Darlene Tooley, Treasurer



Northern Circle Indian Housing Authority
694 Pinoleville Drive, Ukiah CA 95482
707-468-1336 800-521-3191

April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

Northern Circle Indian Housing Authority (NCIHA) is the Tribally Designated Housing Entity for seven tribes located in Mendocino and Butte Counties in California.

In providing comments on the State's Draft Consolidated Plan, the Northern Circle Indian Housing Authority first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

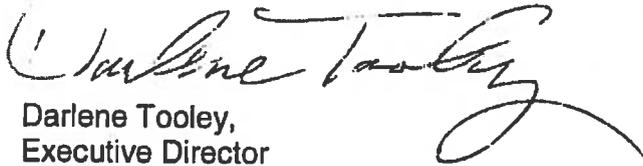
It is in this spirit of cooperation that NCIHA would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive

engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, NCIHA's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me at 707.468.1336 or at ncihatrb@pacific.net if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Darlene Tooley". The signature is fluid and cursive, with a large loop at the end.

Darlene Tooley,
Executive Director
NCIHA

Cc: NCIHA Board of Commissioners



UNITED NATIVE HOUSING DEVELOPMENT CORPORATION

694 PINOLEVILLE DRIVE, UKIAH, CA, 95482 ♦ PHONE: (707) 468.5158 ♦ FAX: (707)468-5615

WWW.UNHDC.NET

April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

United Native Housing Development Corporation (UNHDC) is a 501c(3) that serves the housing needs for native communities in our 9 county service area in Northern California.

In providing comments on the State's Draft Consolidated Plan, UNHDC first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

It is in this spirit of cooperation that UNHDC would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct

nature of Native American housing needs. Consequently, UNHDC's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me at (707) 468 - 5158 or by email at ddobson@pacific.net if you have any questions regarding these comments.

Sincerely,

Dillon Dobson, Cowlitz
Program Development Director
United Native Housing Development Corporation



Hoopa Valley Housing Authority
P.O. Box 1285 • Hoopa, CA 95546-1285 • (530) 625-4759 • Fax (530) 625-4745



April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

Hoopa Valley Housing Authority (HVHA) is the Tribally Designated Housing Entity for the Hoopa Valley Tribe located in Humboldt County in California.

In providing comments on the State's Draft Consolidated Plan, the Hoopa Valley Housing Authority first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

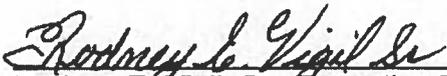
It is in this spirit of cooperation that HVHA would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, HVHA's comments will be

educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me at (530) 625-4759 from 8:00 a.m. to 5:00 p.m. Monday thru Friday or by email at hvhaed@gmail.com if you have any questions regarding these comments.

Sincerely,


Rodney E. Vigil, Sr., Executive Director
Hoopa Valley Housing Authority

ALL MISSION INDIAN HOUSING AUTHORITY

◆ 27740 Jefferson Ave., Ste. 260, Temecula, CA 92590 ◆



April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

All Mission Indian Housing Authority, (AMIHA), is the Tribally Designated Housing Entity for ten tribes located in San Diego, Riverside and Santa Barbara Counties in California.

In providing comments on the State's Draft Consolidated Plan, the All Mission Indian Housing Authority first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

It is in this spirit of cooperation that NCIHA would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, NCIHA's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me at 951-760-7390 or by email at dshaffer@amiha.org if you have any questions regarding these comments.

Sincerely,



Dave Shaffer
Executive Director

KARUK TRIBE HOUSING AUTHORITY



P.O. Box 1159 • 635 Jacobs Way
Happy Camp, CA 96039
Ph: (530) 493-1414 • Fax: (530) 493-1415

1836 Apsuun Street
Yreka, CA 96097
Ph: (530) 842-1644 • Fax: (530) 842-1646

April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Ayukii (Greetings) Ms. DiFrancesco,

The Karuk Tribe Housing Authority is the Tribally Designated Housing Entity for the Karuk Tribe in Siskiyou and Humboldt Counties in California and manages housing units in three distinct communities, Orleans, Happy Camp and Yreka, along 125 miles of the Klamath River Corridor. Although our program offers multiple housing services, our waiting list for affordable housing in all three communities totals 394 households.

KTHA would like to offer the following comments regarding the State's Draft Consolidated Plan. But first, I would like to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for demonstrating a willingness to collaboratively work with Tribes in the State to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, housing conditions.

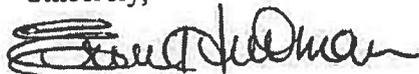
It is KTHA's desire to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on the Karuk Tribe's housing needs. Since not all Indian Tribes have the same issues in regard to housing needs, nor the same capacity to deal with these issues, only engagement of the Native American community will result in an understanding of the scope of

the problems. KTHA is willing to participate in these engagements fully in order to assist HCD to understand the distinct nature of Native American housing needs. Consequently, KTHA's comments will help identify key areas of concern with the aim of strengthening the Plan for all tribes. We recommend the Consolidated Plan incorporate the following:

- Engagement of Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the State Plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me at 530-493-1414 extension 3117 or by email at ehillman@karuk.us if you have any questions regarding these comments.

Sincerely,



Erin Hillman
Director
Karuk Tribe Housing Authority



SHERWOOD VALLEY BAND OF POMO INDIANS

April 30, 2015

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

VIA Email: caper@hcd.ca.gov

Dear Ms. DiFrancesco,

Northern Circle Indian Housing Authority (NCIHA) is the Tribally Designated Housing Entity for seven tribes located in Mendocino and Butte Counties in California.

In providing comments on the State's Draft Consolidated Plan, the Northern Circle Indian Housing Authority first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

It is in this spirit of cooperation that NCIHA would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, NCIHA's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

190 Sherwood Hill Drive • Willits, California 95490
(707) 459-9690 • Fax (707) 459-6936

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact Ms. Scarlett Carmona if you have any questions regarding these comments.

Sincerely,



Michael Knight
Tribal Chairman



GUIDIVILLE

Indian Rancheria

P.O. BOX 339 • TALMAGE, CA 95481 • PH: 707/462-3682 • FAX: 707/462-9183

April 30, 2015

Via Email: caper@hcd.ca.gov

State of California
Department of Housing & Community Development
Division of Financial Assistance
P.O. Box 952054
Sacramento, CA 94252-2054

Attention: Christina DiFrancesco

RE: Comments on State Consolidated Plan due April 30, 2015

Dear Ms. DiFrancesco,

Northern Circle Indian Housing Authority (NCIHA) is the Tribally Designated Housing Entity for seven tribes located in Mendocino and Butte Counties in California.

In providing comments on the State's Draft Consolidated Plan, the Northern Circle Indian Housing Authority first wishes to acknowledge the actions of state entities, specifically the Governor's Office, the Tax Credit Allocation Committee (TCAC) and the Department of Housing and Community Development (HCD) for their willingness to collaboratively work with us to address longstanding programmatic and policy impediments to tribal access to state housing programs. The recent establishment of a Tribal Pilot Program by TCAC, resulting in the first Low Income Housing Tax Credit award in the program's 30-year history and HCD's proactive engagement with the Native American Community to support tribal participation in the development of the State's 10-year Housing Plan represent important first steps to remediating programmatic barriers that have perpetuated widespread and dire tribal shortages of affordable housing and substandard, third world housing conditions.

It is in this spirit of cooperation that NCIHA would like to work with HCD to ensure the final Consolidated Plan remediates the chronic underutilization of State housing resources by Indian Tribes by providing information and context to HCD on Native housing needs and solutions which are currently missing in the Draft Plan. These gaps are so widely embedded in the Plan, that the in-depth analysis and detailed revisions needed to address them will require substantive engagement by HCD with the Native American community. At the core of the problem, is that the Draft Plan reflects a

widespread lack of information, knowledge and understanding regarding the distinct nature of Native American housing needs. Consequently, NCIHA's comments will be educative in identifying key areas of concern with the aim of strengthening the Plan. We recommend the Consolidated Plan incorporate the following:

- Engage Native American tribes and organizations to provide input and guidance in incorporating tribal housing needs into the state plan
- Recognize and document Tribal housing needs as distinct and do not subsume them into larger categories of housing need in which they do not fit
- Incorporate within the Market Analysis Section a tribal sub-market housing analysis adapted to the distinct Native context, processes and conditions under which tribal housing is provided
- Identify how the current structure of state housing programs act as Policy impediments to tribal access to badly needed affordable housing resources
- Require housing elements, RHNA's and other relevant local and regional planning process to engage tribes and incorporate tribally generated data into the processes
- Establish carefully targeted tribal housing goals that are aligned with dedicated resources and programs to deliver them
- Adapt and change the key housing delivery programs to be more accessible to tribes
- Establish culturally competent outreach and technical support services needed to increase effective tribal utilization of these key housing resource delivery programs
- Monitor utilization of state housing programs by tribes during the Plan's duration and make adjustments as needed

Thank you for the opportunity to provide comments. Do not hesitate to contact me if you have any questions regarding these comments.

Sincerely,



Merlene Sanchez
Tribal Chairperson