

Jessica Martinez

From: Andrea Curry <andrea@tehamacoc.org>
Sent: Friday, August 23, 2024 11:13 PM
To: Jessica Martinez
Subject: Tehama County Housing Element 2024-2029 Comment Submission

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Hi Jessica –

Please accept the following as Public Comment on the 2024-2029 Tehama County Housing Element. I am submitting these comments as a resident of unincorporated Tehama County as well as in my capacity as the CoC Coordinator for the Tehama County Continuum of Care, however, it should be noted that these comments represent my own viewpoints and not necessarily those of all CoC members or member organizations.

Please let me know if you have any questions or would like to discuss any of these topics further.

1. Technical Considerations:

- a. In several places throughout the draft, Table 6-9, Summary of Financial Resources for Housing, is incorrectly referenced as Table 2-14. This error appears in the descriptions of Implementation Programs HE-2.A on page 2-6, HE-3.B on page 2-9 and HE-4.A on page 2-10.
- b. In the 2nd paragraph on page 3-34, the draft references Table 2-6, Permitted Uses, however, the Permitted Uses table in this draft is actually Table 6-3.
- c. In the 1st full paragraph on page 6-10, the draft refers to “R-4 sites identified in Table 2-2,” however there is no Table 2-2 in the document. I believe the intent was to reference Table 5-2.
- d. There appear to be two typographical errors on page 1-5: In the Answer to the question regarding Policy HE-6.a, the word “has” is misspelled, and in the answer to the question regarding HE-4.B, the word “broke” is misspelled.

2. Potential Corrections/Additions:

- a. On page 3-30 in section entitled “Families and Individuals in Need of Emergency Shelter,” there is a sentence that begins, “Among the primary groups that comprise the homeless population ...” that contains a number of outdated terms, some of which could be perceived as offensive (i.e., “battered women”, “mental patient”, “addicts”, etc.). Please consider omitting this sentence entirely, as in addition to the problematic language, it is not consistent with what we know about the population of people experiencing homelessness in Tehama County or even people experiencing homelessness more generally. If, for whatever reason, the sentence cannot be removed, please consult qualified individuals in the relevant fields for appropriate

terminology (i.e., the domestic violence response field, behavioral health professionals, substance use recovery programs, etc.).

- b. In the same section, in the 1st paragraph on page 3-31, there is a parenthetical statement that reads, "(The count was taken on January 30, 2023 when the rotating PATH shelter was open.)". This is inaccurate. PATH's seasonal shelter ceased operation in March of 2020. There were no emergency shelters for the general homeless population in operation at the time of the 2023 Point in Time Count. The 19 individuals counted in the 2023 Point in Time Count as being in emergency shelter were all at Empower Tehama's Domestic Violence Emergency Shelter.

- c. Near the end of the 1st paragraph on page 3-31, the text reads, "At the time this Housing Element document is adopted, the City of Red Bluff/Tehama County coordinated Homeless shelter at 550 Lay Ave., Red Bluff CA "PATH Plaza" will be completed, which will provide between 65 and 80 more spaces for those needing shelter in Tehama County." This is inaccurate, in that PATH Plaza Navigation Center has 64 beds, however, you might consider revising the entire sentence to better describe the project and its development history:

Consider revising this sentence to read, "The county's first year-round emergency shelter serving people experiencing homelessness, PATH Plaza Navigation Center, opened on May 1, 2024. PATH Plaza's services include a 64-bed overnight shelter and comprehensive day shelter services, including meals, a clothing closet, pet food, mail services, and case management services. The development of this project was a collaborative effort between the County of Tehama and cities of Red Bluff, Corning and Tehama, the Tehama County Continuum of Care (Tehama CoC), and Poor and the Homeless Tehama County Coalition (PATH), who serves as the project's operator and primary service provider."

- d. In the last sentence of paragraph on page 3-31, the text reads, "Therefore, this new facility will increase the number of sheltered individuals in Tehama County leading to approximately 45 percent of the countywide homeless population being sheltered."

Consider revising that sentence to read, "PATH Plaza's opening has increased Tehama County's shelter capacity to allow between 36 and 45 percent of the countywide homeless population to be sheltered on any given night, depending on household configuration."

This suggested revision is based on the adjustment of the number of beds at PATH Plaza in the previous sentence, the actual number of beds that were available in 2023 (57 persons were sheltered, but there were actually 72 beds in shelter/transitional), and the fact that a significant number of shelter and transitional beds are located in "family units" that are full once occupied by one family, making it possible for there to be up to 27 beds across the local shelter/transitional system that are "empty" but not "available" on any given night.

- e. On page 3-32, the descriptions of PATH services in both the bullet point in the middle of the page and in the last paragraph on this page are outdated and includes a description of the seasonal shelter that ceased operating in March of 2020.

Consider revising the bullet point description to read, "Poor and the Homeless Tehama County Coalition (PATH) is a non-profit organization provides services to people

experiencing homelessness in Tehama County. Through the PATH Plaza Navigation Center in Red Bluff, PATH offers overnight shelter and day shelter services, which include meals, a clothing closet, pet food, mail services, showers, laundry services, case management and resource navigation. PATH's Street Outreach Services provides mobile assistance with basic needs and connections to supportive services, including housing services, to unsheltered individuals throughout the county. PATH also operates a comprehensive transitional housing program, with accommodations for single men, single women and families with children, as well as a rapid rehousing program that assists households experiencing homelessness with obtaining and retaining permanent housing through provision of targeted supportive services and intensive case management paired with financial assistance with move-in costs like security deposits and utility deposits and time-limited rental assistance," and revising the text in the final paragraph to remove reference to the seasonal shelter.

- f. The last paragraph on Page 3-34 contains three inaccurate statements:
- i. Consider deleting entirely or revising the sentence that now reads, "Currently, there are no homeless shelters in Tehama County, although an application for CDBG funding has been submitted to the State Housing and Community Development to establish a Homeless Shelter and One Stop Navigation Center on County owned land in the City of Red Bluff," to read, "There is currently one shelter serving people experiencing homelessness in Tehama County, located within the PATH Plaza Navigation Center." (The existing statement was true in 2019, and the county was awarded the CDBG funding for which they applied, however, after encountering barriers to implementing the original plan to renovate an existing county-owned facility for this use, the County subgranted the CDBG funds to PATH for the development of what is now the PATH Plaza Navigation Center, which includes both the Emergency Shelter component mentioned, as well as the One-Stop service hub concept also mentioned.)
 - ii. Consider deleting the statement, "Currently, area churches provide shelter for the homeless ..." as this statement is no longer accurate. Area churches previously allowed use of their facilities in partnership with PATH's seasonal shelter, which ceased operating in March of 2020.
 - iii. Consider deleting, or at least confirming with the mentioned provider, the statement "... while the Salvation Army provides vouchers for stays at motels." To the best of my knowledge, the Salvation Army does not currently provide this service, and I'm confident that if it did, those of us in the homelessness response field would be aware of it (and enthusiastically referring people to it!)
- g. Table 6-9, Summary of Financial Resource for Housing, on pages 6-15 through 6-19, includes a number of funding programs that are no longer available or that have changed significantly. I am not familiar with all of the resources listed in Table 6-9, so my comments below are not exhaustive; I've only noted the ones that I have knowledge of and that are either no longer available or have changed:
- i. Federal Programs:
 1. The name of the "Emergency Shelter Grants (ESG) Program" was changed to "Emergency Solutions Grant (ESG) Program" sometime prior to 2014. Additionally, the description of this program is outdated. While

ESG does still fund emergency shelter, and in some cases, transitional housing, it prioritizes funding for programs that offer Rapid Rehousing, a service model designed to assist households experiencing homelessness access permanent housing through offering time-limited rental assistance paired with case management and other supportive services.

2. The HUD Shelter Plus Care (S+C) Program is no longer available, per the program's [HUD Exchange](#) webpage.
3. The HUD Supportive Housing Program (SHP) is no longer available, per the program's [HUD Exchange](#) webpage.

ii. State Programs

1. Per the [HCD Archived Programs](#) webpage, the following programs "no longer receive funding for future activities":
 - a. Building Equity and Growth in Neighborhoods (BEGIN)
 - b. California Self-Help Housing Program
 - c. Emergency Housing Assistance Program (EHAP)
 - d. Jobs Housing Balance Incentive Grant Program
2. The Mobile Home Park Resident Ownership Program (MPROP) has been overhauled and its name has been changed to [Manufactured Housing Opportunity & Revitalization Program \(MORE\)](#)
3. Several of the CHFA programs listed in the table do not appear to be active anymore, however, the some of the descriptions are similar to current CalHFA programs described on their webpage as part of the [MyHome Assistance Program](#) and the [California Dream For All Shared Appreciation Loan](#)

3. Affordable Housing for Extremely Low-, Very Low-, and Low-Income Households

In Tehama County's 2014-2019 and 2019-2024 Housing Elements, the County committed to working with developers to "Identify and pursue available federal, state, and private financial resources for the provision of affordable workforce housing and housing affordable for extremely low-, very low, and low-income households," through Goal HE-2.A, however, per the Review of Previous Programs in both the 2019-2024 Housing Element (Table 3-3) and the 2024-2029 Housing Element draft (Table 3-3), the County did not receive any developer interest in any of the 10 years covered by those plans. Neither review offers any analysis of what may have contributed to the lack of interest, and the "Lower Income" sections of the Vacant Sites Capacity all three Housing Elements – 2014-2019, 2019-2024, and the current draft of the 2024-2029 Housing Element, depend heavily on some variation of the same 20-30 acres of vacant R-4 land for development of housing for extremely low-, very low, and low-income households.

Considering that the availability of vacant sites that are zoned appropriately for multi-family housing and in close proximity to amenities like grocery shopping and public transportation is a crucial factor in successfully accessing federal and state resources to support the development of affordable housing, and in turn, to generating the interest of developers that specialize in this type of housing, it stands to reason that the fact that the only vacant land

zoned appropriately for development of such housing is contributing to the persistent lack of interest from affordable housing developers.

It should be noted that the current Housing Element draft also includes an additional R-4 parcel, not listed in previous Housing Elements, that it suggests is available to realistically accommodate 3 units of housing affordable to either extremely low-, very low-, or low-income households, however, that a project this small would be economically feasible for an affordable housing developer is not at all likely.

I appreciate the work that Tehama County has put in to paving the way for low-income affordable housing to be developed on the larger tracts of land northwest of Red Bluff, and while it has not been successful in attracting affordable housing developers to build on those parcels, it could easily stand as a model for actions that could be taken to convert other, more appropriate land to be developed for this purpose.

As part of Implementation Program HE-1.C of the current Housing Element draft, the County states that it will "Work with landowners and developers to create sites ranging from one to 10 acres in size on larger parcels that are feasible and appropriate for the development of affordable housing." Pursuant to this commitment, please consider reaching out to Poor and the Homeless Tehama County Coalition (PATH) to discuss the possibility of utilizing land that they own in unincorporated Tehama County for this purpose. This land, one corner of which already serves as an existing TRAX bus stop, is considerably closer to the amenities in Red Bluff that affordable housing developers look for in viable building sites. The entire property encompasses nearly 80 acres on six parcels, two of which may already be sized appropriately for affordable multi-family housing (one is 8 acres, the other is 2 acres), were they to be re-zoned R-4. Two additional of the parcels are very large (41 acres and 36 acres), but PATH has indicated that they would be agreeable to lot splits to support development of housing for this population, which overlaps considerably with the population that PATH's existing programs serve. At least two existing, long-standing multi-family housing developments that are home to a number of households that fall into this income category are already established nearby, making it more likely that developers would consider the area appropriate for this type of housing development.

If you are unsure of how to get in contact with PATH, please let me know and I would be happy to provide an introduction.

4. Expanding access to Temporary and Permanent Housing for Low-Income Households

Please consider facilitating expanded access to interim, and potentially permanent housing for special needs populations and extremely low-, very low- and low-income households through allowing developments of "Tiny Home Villages" in residential districts, provided certain requirements are met. The Tiny Home Village model has been used successfully in other communities to provide temporary housing for people experiencing homelessness as an interim solution where appropriate supportive services are in place to promote stabilization and coordinated exits to permanent housing. Through a recent award of Encampment Resolution Funding (ERF) through HCD, Tehama CoC and PATH have been awarded funds to purchase tiny homes, and PATH would like to explore the possibility of adding these units to their large tract of land off of Sale Lane. We would be interested in working with the County to explore how this can be accomplished.



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