

From: Peters, Sarah
To: [Flynn, Maria](#); [Sanchez, Diana](#)
Subject: FW: Comment re: item 5B, 24-759 Application for Permanent Local Housing Allocation Program
Date: Tuesday, May 28, 2024 10:01:05 AM

It doesn't look like either of you were copied on this comment.

Thank you,

Sarah Peters

Assistant Planner

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****City Hall is open for business 9:00 am – 5:00 pm Mon, Tue, Thu, and Fri; closed Wed and closed for lunch daily between 12:30-1:30 pm. I will respond to your email at my earliest convenience. Thank you for your patience.****

From: Shelley Mae Green <mtn.morn@gmail.com>

Sent: Monday, May 27, 2024 11:29 AM

To: Norvell, Bernie <bnorvell2@fortbragg.com>; Godeke, Jason <JGodeke@fortbragg.com>

Cc: Albin-Smith, Tess <talbinsmith@fortbragg.com>; lpeters@fortbragg.com; Rafanan, Marcia <mrafanan@fortbragg.com>; McCormick, Sarah <smccormick@fortbragg.com>; Peters, Sarah <speters@fortbragg.com>

Subject: Comment re: item 5B, 24-759 Application for Permanent Local Housing Allocation Program

Dear Fort Bragg City Council members,

I am writing to suggest that the Council **remove the word "an"** in the sentence at the bottom of page 1, continuing on page 2, in the **Application for Permanent Local Housing Allocation Program** funds. The funds can certainly be used as rent payment assistance, but this wording change will make it possible to also use (some of) the funds as low-interest, short term loans to remodel garages into "Community Cottages." **"An"** defines the project/developer as singular. **Removing the**

word "An" allows for either a single, or multiple entities to utilize the loan monies.

It would read as follows:

"BE IT FURTHER RESOLVED that, Applicant certifies that, if funds are awarded for the development of Affordable Rental Housing Development, the Local Government shall make PLHA assistance in the form of a low-interest, deferred loan to the Sponsor of the Project, and such loan shall be evidenced through a Promissory Note secured by a Deed of Trust and a Regulatory Agreement shall restrict occupancy and rents in accordance with the Department-approved underwriting of the Project for a term of at least 55 years."

CA Code section 65852 says, "ADUs are an essential component of California's housing supply."

According to the California Department of Housing and Community Development, "Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) are an innovative and effective option for adding much needed housing in California." ADUs can be "Converted Existing Space: (e.g., master bedroom, attached garage, storage area, or similar use, or an accessory structure) on the lot of the primary residence that is converted into an independent living unit."

So, Community Cottages (aka "garage conversions") are considered ADUs. ADUs are one of the allowable uses for the California Permanent Local Housing Allocation/ 2023 PLHA, as quoted below.* Section 7300 also supports this kind of housing, as quoted below.**

Thank you for your consideration.

Sincerely,

Shelley Green

* As quoted from the California Permanent Local Housing Allocation/ 2023 PLHA--

The principal goal of this program is to make funding available to eligible Local Governments in California for housing-related projects and programs that assist in addressing the unmet housing needs of their local communities.

B. Eligible Activities

2. The predevelopment, development, acquisition, rehabilitation, and preservation of Affordable rental and ownership housing, including Accessory Dwelling Units (ADUs), that meets the needs of a growing workforce earning up to 120 percent of Area Median Income (AMI), or 150 percent of AMI in High-cost areas. ADUs shall be available for occupancy for a term of no less than 30 days.

6. Assisting persons who are experiencing or At risk of homelessness, including, but not limited to, providing rapid rehousing... and the new construction, rehabilitation, and preservation of permanent and transitional housing.

** As quoted from the California Multifamily Housing Program Guidelines Section 7300--

Section 7304. Eligible Uses of Funds--

- (b) (4) construction and Rehabilitation work;
- (6) on-site improvements related to the Rental

Section 7307. Maximum Loan Amounts (pg10)

(b) (2) The initial base amount shall be \$30,000 per Restricted Unit...

Section 7308. Interest Rate and Loan Repayments (pg 11)

- (a) Loans shall bear simple interest of 3% per annum on the

unpaid principal balance.

Section 7329. Eligibility for RWD Loans (pg 35)

(a) (2) include the new construction or Rehabilitation of a Rental Housing Development, or conversion of a nonresidential structure to a Rental Housing Development

(t) "Substantial Rehabilitation" means a Rehabilitation Project where the contract for Rehabilitation work equals or exceeds \$25,000 per Unit.

In California, a multifamily dwelling or use means "any Structure with more than one Dwelling Unit or Guest Room, and used for long-term dwelling."