

Affordable Housing: Monitoring and Compliance

Who is Watching the Henhouse?

SUMMARY

In response to citizens' complaints and reports published in The Press Democrat, the 2021-2022 Sonoma County Civil Grand Jury (Grand Jury) investigated the monitoring of Affordable Housing within Sonoma County. Affordable Housing, as defined by the U.S. Department of Housing and Urban Development, is housing priced on the basis of family income, not the market rate. Monitoring involves verification of tenant incomes and continued eligibility for an Affordable unit, the owner's or manager's collection of required information, and the ongoing maintenance of the property and its amenities. Housing departments for the County and its nine Cities are required to monitor compliance with the regulations for occupancy of Affordable Housing.

All housing is in short supply; this includes Affordable Housing, which should be available only to those who qualify. This report examines the monitoring of existing Affordable Housing. A companion report, "*Affordable Housing: Past, Present, and Future*," examines the potential for increasing its availability.

The Grand Jury investigated procedures used in the County and its nine cities and found that monitoring was inconsistent among the housing jurisdictions. All of the agencies were overly reliant on self-reported information from owners and managers. Direct observation and verification through on-site monitoring were rare and essentially ceased during the COVID-19 shutdowns. A low priority was often given to monitoring, and the staffing to do it was usually insufficient. The Grand Jury concluded that there was little probability that illegal behaviors, if they existed, would be detected using current procedures.

Recommendations from the Grand Jury include increased on-site personal monitoring at housing locations, more standardization of procedures, consistent and on-going training with developers and property managers, and better coordination and cooperation amongst agencies to increase efficiency.

GLOSSARY

- ABAG Association of Bay Area Governments
- AMI Area Median Income
- CDC Sonoma County Community Development Commission
- HAP Housing Assistance Payments
- HUD U.S. Department of Housing and Urban Development
- RHNA Regional Housing Needs Allocation
- SCHA Sonoma County Housing Authority
- Section 8 Section 8 Housing Choice Vouchers

BACKGROUND

Housing in Sonoma County is widely acknowledged to be in short supply and very expensive. A chart¹ in The Press Democrat for March 13, 2022 showed the median price of a home in January 2022 to be \$789,000, up from \$715,000 just a year earlier. As reported by the [North Bay Business Journal](#), Sonoma County median rent for a one or two-bedroom unit is \$2,167, and residents are increasingly unable to afford a suitable place to live.

Common complaints include:

- My adult kids can't afford to live here and will have to move somewhere else.
- My rent is so high I can't afford to pay my other bills.
- I couldn't afford my house if I had to buy it today.
- Sonoma County needs to have more affordable places to live.”

The term “affordable housing” can have different meanings:

“**AH**” = In this report and more generally in the housing industry, we use capital letters to identify Affordable Housing as apartments or houses that are potentially available to rent or are deeded as Affordable for those who earn a specified percentage of the median income.

“**ah**” = Lower case letters are used to differentiate between the two meanings of affordable housing; “ah” is a more general term. An apartment that rents for \$3,500/month might be affordable to an executive but may not be affordable to a junior employee, a retiree, or a person with disabilities.

The Federal Government, State, County, Cities and private organizations have created programs that make home buying or apartment rental more attainable. Affordable Housing, as defined by the U.S. Department of Housing and Urban Development (HUD), means that families pay rent or purchase homes at prices determined by their incomes rather than by the housing market. These programs have strict and specific conditions that define eligibility. Income and family size are central, but other factors such as individuals with disabilities, senior status, or veterans may sometimes be a consideration. Since many more residents are qualified to receive Affordable Housing than housing is available, it is reasonable to ensure that the limited supply is occupied by those for whom it is intended. It is also logical to ensure that the housing is managed and maintained appropriately. Local County and city housing departments are charged with monitoring compliance with the conditions of the programs. A draft of the Sonoma County CDC [Affordable Rental Housing Monitoring Procedures](#), presented to the Sonoma County Board of Supervisors on December 7, 2021, outlines their recommendations. Each of the nine cities would benefit from also having clearly defined procedures if they do not already exist.

In 2021, The Press Democrat published award-winning reports on a situation in Sonoma County where individuals rented apartments for which they were not eligible. The Grand Jury also received citizen complaints about this specific situation. This case has been well documented by the press and investigated by County authorities and is still a subject for potential lawsuits.

For these reasons, the Grand Jury did not center its attention on this individual problem, but rather, asked more general questions. What are the requirements for access to Affordable Housing? What are the requirements for verifying and monitoring compliance with the

¹ Prices are from the sales of single-family homes recorded in Sonoma County.

regulations? How is the monitoring done? Is the monitoring sufficient to assure compliance? How common is fraud? How can monitoring be improved? This report attempts to answer these questions.

METHODOLOGY

This investigation was initiated in response to citizen complaints received by the 2021-2022 Sonoma County Civil Grand Jury.

The Grand Jury conducted interviews with key individuals in Sonoma County who are involved in the Affordable Housing arena. They included:

- County and City officials
- Non-profit agencies
- Affordable Housing agencies and advocates

The Grand Jury reviewed and evaluated documents from a wide range of sources addressing Affordable Housing, including many websites, from Sonoma County, the nine cities, State and Federal agencies. The most important of these are listed in the Bibliography.

DISCUSSION

What is Affordable Housing?

Affordable Housing is defined in multiple ways and categories. Still, all are based on the ability of a tenant or buyer to pay no more than a specific percentage of their income for housing. The rules and requirements are complex; Article 89 of the Sonoma County zoning code, [Affordable Housing Program Requirements and Incentives](#), is 215 pages long. Eligibility resides in four or more categories, with income levels compared to the area median income (AMI) in Sonoma County. The AMI is determined annually by the [U.S. Department of Housing and Urban Development](#) (HUD) using sampled census data for a four-person household. This number, which is currently \$103,300, is used to calculate similar numbers for smaller and larger households using formulas developed by HUD. Rent levels are then defined in relation to family size and income level.

As an example, the tables below show [income and rent limits](#) used by the [Sonoma County Community Development Commission](#) (CDC) for rental housing in several (but not all) programs under its control. Other programs may use different limits, but the basic principles are the same; housing cost for the tenant is based on income, not on the market price of a comparable apartment or house.

Persons in Household	Acutely Low Income (15% Area Median Income)	Extremely Low Income	Very Low Income 50% AMI	60% AMI*	Low Income 80% AMI**	Median Income 100% AMI	Moderate Income 120% AMI
1	\$10,850	\$24,450	\$40,750	\$48,900	\$65,150	\$72,300	\$86,750
2	12,400	27,950	46,550	55,860	74,450	82,650	99,150
3	13,950	31,450	52,350	62,820	83,750	92,950	111,550

4	15,500	34,900	58,150	69,780	93,050	103,300	123,950
5	16,750	37,700	62,850	75,420	100,500	111,550	133,850
6	18,000	40,500	67,500	81,000	107,950	119,850	143,800
7	19,200	43,300	72,150	86,580	115,400	128,100	153,700
8	20,450	46,100	76,800	92,160	122,850	136,350	163,600

Table 1: Maximum Income to Qualify for Affordable Housing in Sonoma County
Source: CDC website

As of January 1, 2022, the CDC uses the table above to determine eligibility for multiple categories of Affordable rental housing.

*60% of AMI is used as a data point for other programs using the local region’s “Housing Affordability Index” (HAI)

**HUD defines Low income as 50-80% of AMI and Very Low Income as 30-50% of AMI to qualify for Section 8 housing vouchers.

Unit Size (assumed # occupants)	Extremely Low Income Rent Limit (30% AMI)	Very Low Income Rent Limit (50% AMI)	Low Income Rent Limit (60% AMI)*
Studio (1)	\$611	\$1,019	\$1,223
1 Bedroom (2)	699	1,164	1,397
2 Bedroom (3)	786	1,309	1,571
3 Bedroom (4)	873	1,454	1,745
4 Bedroom (5)	943	1,571	1,886

Table 2: Maximum rent limits for Inclusionary Affordable Housing in Sonoma County
Source: CDC website

*Housing Affordability Index vs. HUD definitions/thresholds

The above table shows the maximum rent for an Affordable Housing unit as of January 1, 2022. These rent limits are calculated using the formula in California Health & Safety Code [50052.5](#) & [50053](#). The rents are based on the income limits for an assumed household size equal to the number of bedrooms in the unit plus one person. For example, the rent for a three-bedroom unit is based on the income limits for a four-person household. Unless otherwise specified, utility costs are included in the maximum rent as set by federal housing laws.

Affordable Housing can also be further directed to specific groups such as seniors, farm workers, individuals with disabilities, veterans, and in some cases, specific professions such as educators or health care workers.

Subsidies for Affordable Housing

Affordable Housing is most common in mid-size to larger developments and can be considered in two categories.

1. One hundred percent Affordable Housing developments: These projects are often constructed and managed by mission-driven non-profit organizations such as MidPen or Burbank Housing, but for-profit developers are also represented here. Building and amenity standards for developments are also expected to ensure comparability to market-rate housing.
2. Inclusionary Affordable Housing: To encourage construction of Affordable Housing, local ordinances may specify a percentage of Affordable units, usually 10-20%, which must be included in a project. Inclusionary housing is almost always built by ‘for-profit’ developers who will rent or sell these units at lower Affordable rates while the other units will be rented or sold at the market rate. Both apartment complexes and single-family home developments are subject to inclusionary housing ordinances. These ordinances take effect only when a development reaches a specific size set by the County or city, for example 10 units.

The limitations on income and allowable prices often bear little relationship to the real-world costs of building, managing, and maintaining a housing development. Materials and labor costs for a project are the same whether the end product is Affordable or the market determines prices. Affordable Housing projects typically have multiple funding sources, including Federal and State loans that have long-term fixed low interest rates and may allow deferment of repayment and eventual forgiveness. Funding can also come from Federal or State grants, and construction costs may be reduced by accelerating approvals and modifying some requirements such as the number of off-street parking spaces required.

Subsidies are available to supplement rent payments and thus allow some qualified residents to occupy either Affordable or market-rate housing. The best known of these are Section 8 Housing Choice Vouchers (Section 8) which are funded by HUD and issued through local housing authorities. In Sonoma County, Section 8 vouchers are issued through the CDC and by the City of Santa Rosa Housing Authority. A voucher holder can occupy any acceptable rental property where the landlord accepts the voucher and agrees to the program's requirements. The voucher is valid anywhere in the County or beyond, and the holder pays only an income-based portion of the rent; HUD pays the remainder directly to the landlord.

Unfortunately, the need for Affordable Housing greatly exceeds the available supply. Each Affordable Housing development has a waiting list that may include several years wait before a unit becomes available. Section 8 vouchers within Sonoma County also have a long waiting list. New applicants can only join the Section 8 waiting list through a lottery process. The last lottery was held in October 2021 and the next is not expected until about October 2023. Again, the wait is measured in years.

How Much Affordable Housing is There in Sonoma County?

The website of [Affordable Housing Online](#) suggests that there are 8,700 Affordable rental apartments in Sonoma County. The site delineates 2,510 income-based units for which direct subsidies (*e.g.* Section 8 vouchers) are available and 6,023 apartments which are subsidized indirectly (*e.g.* as inclusionary units).

The [CDC](#) website identifies individual Affordable Housing developments, community by community. It shows a smaller number of apartments (8,129), but it is not clear when it was last updated. Santa Rosa lists individual complexes within the City, showing 3,817 Affordable units, while the CDC website shows 4,076 units in Santa Rosa. Again, it is unclear how current these numbers are. New construction is ongoing, and all of the specific numbers for Affordable units will probably be out of date by the time this report is published.

The number of Affordable apartments may appear to be large, but very few, if any, are actually available and unoccupied at any given time, resulting in long wait lists. Moreover, given the approximately half-million population of Sonoma County, there is not a sufficient supply to meet the need for an Affordable place to live.

The [Association of Bay Area Governments](#) (ABAG) periodically evaluates the housing requirements of the greater area. It then prepares a [Regional Housing Needs Allocation](#) (RHNA) for each county and its cities. The allocation for Sonoma County for 2023-2031 calls for 14,562 new housing units to be added over the next several years. Of this total, 3,999 are designated as very-low-income housing and 2,302 as low-income housing units. In each category, roughly one-third is allocated to Santa Rosa, one-third to the eight other cities of the County, and one-third to unincorporated areas of Sonoma County. If fulfilled, RHNA allocations would increase the number of Affordable units by more than two-thirds. The demand for oversight of these new residences would increase accordingly.

Section 8 Housing Choice Vouchers Monitoring Requirements

Access to Affordable Housing is a precious commodity and it should only be available to those who qualify. It is the responsibility of the local housing authorities to ensure that this is the case. Monitoring of compliance with conditions and regulations is required on a regular basis for virtually all Affordable Housing programs. The diagram below illustrates the various obligations inherent in CDC oversight of Section 8 rental properties.

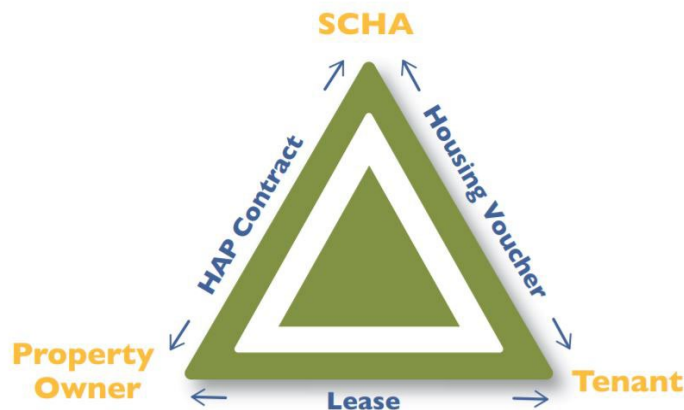


Figure 1. Participant Responsibilities in Section 8 Affordable Housing.
Source: Adapted from the CDC website.

Property owners must sign a rental agreement or lease with the Section 8 participant. The property owner agrees to provide decent, safe, and sanitary housing as confirmed by regular Housing Authority inspections. The primary benefit to the property owner for participating in the program is that the federal government guarantees a portion of the rent.

Property Owner Responsibilities Include:

- Perform all management and rental functions, including screening and selection of tenants.
- Maintain the units and property in accordance with Housing Quality Standards.
- Prepare information required under the Housing Assistance Payments (HAP) contract and furnish the information to the Housing Authority.

Sonoma County Housing Authority Responsibilities Include:

- Make rental assistance payments to the landlord in a timely manner.
- Regularly evaluate family eligibility including income and family size.
- Inspect units at least once every two years.
- Investigate potential fraud or program abuse by tenants or landlords.

Tenant Responsibilities Include:

- Supply information determined necessary by the Housing Authority or HUD to administer the program, including the completion of scheduled income reviews.
- Act responsibly as a tenant, paying rent and utilities on time and minimizing damage to the property.
- Notify the Housing Authority and the owner 30 (no more than 60) days before moving or terminating the lease.

Inclusionary Rental Housing Monitoring Requirements: How is it Done in the Real World?

Monitoring of inclusionary housing is clearly defined by County ordinance:

Rental Unit Monitoring: “The CDC shall monitor the rental of affordable units for compliance with the Affordable Housing Agreement and the provisions of this Article. On an annual basis, the owner shall pay to the CDC a fee for monitoring each unit subject to the Affordable Housing Agreement, which fee shall be established by resolution of the Board of Directors of CDC from time to time. (Ord. No. 6085, § IV (Exh. C), 10-7-2014)”

Other housing jurisdictions may have similar or less specific monitoring expectations, while some do not define their procedures at all (see Table 3 below). Thus, housing personnel must deal with different sets of expectations for multiple properties within their jurisdiction. There are two approaches to monitoring compliance with Affordable Housing requirements:

- *Self-Reporting:* The owner/manager/landlord of a rental property is required to reconfirm eligibility for at least a percentage or specific number of Affordable Housing tenants, often on a set schedule. This involves verification of income and other factors, such as occupancy numbers, depending on the program under which the unit is rented. This information is reported to the CDC or to the local housing jurisdiction for units not under CDC purview. The housing departments are then required to verify that the information supplied by the landlord is accurate and complete. There is currently no CDC requirement for on-going compliance training for owners, managers, or staff. Within the cities, training is also limited.
- *On-site monitoring:* It would be wasteful of staff and resources to replicate the activities of the landlord, but spot-checking of some number or percentage of units is feasible. A housing department monitor visits a site, interviews the manager or owner, examines

selected records, verifies their accuracy with the tenants, and inspects the property, including one or more units.

In practice, on-site monitoring is done by first making an appointment with an owner or manager and describing what needs to be seen or done on a visit. Surprise or unscheduled monitoring is rarely or never done because the required documentation may be incomplete or unavailable. It could also be intrusive to tenants, and the owner, manager, or tenant may simply be unavailable when the monitor arrives. Interviewees stated that on-site monitoring was rare even before the onset of the COVID-19 pandemic. It was eliminated during the COVID-19 restrictions, when non-essential contact was minimized to avoid spread of the virus. In most cases, on-site monitoring has not been reinstated. In practice, the County and Cities rely almost totally on self-reporting from developers and managers.

The costs of on-site monitoring and verification of self-reported data are the responsibility of the housing agency, and monitoring is often seen as an unfunded mandate. It is therefore not surprising that housing agencies in Sonoma County are motivated to accept the data supplied by owners and managers as accurate. Monitoring is also limited by staff availability, which has been exacerbated by the COVID-19 crisis. This has resulted in an inability to actually visit sites and interact with residents and managers. The lack of personnel was a significant concern to almost all of the housing representatives the Grand Jury interviewed. Again, this results in reliance on self-reporting by development owners and managers.

There are good reasons for owners and managers to monitor compliance accurately. Non-profit developers of Affordable Housing are mission-oriented. They are committed to providing Affordable Housing to those who qualify for it. Non-compliance is not only wrong, but also a threat to their continued access to low-cost financing and other concessions. For-profit complexes with inclusionary units also have good reasons to assure compliance. They too could lose access to low-cost financing, be subject to fines or lawsuits, and generate bad publicity and public distrust if they fail to comply with Affordable Housing agreements.

Incentives for owners and managers to minimize monitoring also exist for various reasons.

- Compliance verification takes time and effort and therefore involves costs.
- It can be intrusive to a tenant when the monitor needs to enter or inspect their apartment or house.
- Not everyone follows the prescribed guidelines; an unqualified friend, relative, or associate could be favored.
- Through mismanagement, Affordable units could be rented for more than the allowable amount.

Compliance monitoring is a significant burden to the housing departments which conduct it. The burden will increase significantly as RHNA requirements are met and the supply of Affordable Housing units is greatly increased. Unfortunately, the person-power, time, and resources allocated to monitoring already appear to be insufficient. The table below illustrates the size of the monitoring task and the resources currently available to do the work. Future RHNA Allocations represent the number of units which are expected or required to be added in each community between 2023 and 2031.

Housing Authority	Current Number Of Apartments	Future RHNA Allocation	Monitoring Personnel	On-Site Monitoring *
Cloverdale	221	117	None dedicated	No
Cotati	88	94	None dedicated	No
Healdsburg	352	299	None dedicated	Rare
Petaluma	1,206	787	One + one open position	Annual
Rohnert Park	564	629	None dedicated	No
Santa Rosa	4,076	1,919	One (80%)	Not since Covid
Sebastopol	327	86	One, occasional	No
Sonoma	389	131	One, part time	Some
Unincorporated So Co	109	1,632	One	Rare
Windsor	398	607	One, part time	No
Total	7,730	6,301		

Table 3. Monitoring Tasks and Resources
Source: Interviews with multiple housing personnel

*On-site monitoring should include file reviews, grounds inspections, and apartment/house inspections. This monitoring was suspended during the COVID restrictions.

Inclusionary Housing Ownership Monitoring Requirements

Single-family homes are a smaller segment of Affordable Housing and are governed by somewhat different rules and expectations. Potential homebuyers are evaluated and their incomes are verified. The price of the house is then set, based on the income of the family. Mortgage payments, utilities, taxes, etc. are factored into the amount paid. Continued income verification is not required, and incomes can increase beyond the Affordable level at which the house was purchased. However, if the house is resold, it must be sold as Affordable. The Grand Jury recommends that this information be attached to the title of the house and apparent to any title company involved in a resale. The requirement is central to the original contract; it allows the buildup of equity through mortgage payments, but ensures that the house remains Affordable for the next buyer. Housing departments should maintain an inventory of Affordable houses within their jurisdictions and verify that their titles are flagged for restricted sale, and not at market rate.

Is There Significant Fraud in the Management of Affordable Housing?

The Grand Jury investigation cannot provide a definitive answer to this question, nor can the housing departments that are charged with monitoring. No one the Grand Jury interviewed expressed fears of widespread misbehavior. Nevertheless, owners and managers have provided almost all of the information concerning compliance, with little or no opportunity for direct documentation by housing department monitors. Staff who were responsible for monitoring see this as a potential problem, and most expressed the desire to re-initiate on-site monitoring visits.

How Can Monitoring be Improved?

Housing personnel from the nine cities and the CDC meet regularly to discuss planning issues and the administration of their housing programs. Monitoring can be included in these

discussions, but the Grand Jury found there is, as yet, little coordination or cooperation in the actual monitoring process. Each city has its own personnel, procedures, and expectations, and none claim to give monitoring their highest priority. The quality of monitoring throughout the County could be improved if the various agencies agreed on a common set of goals, expectations, and procedures that set higher and more uniform standards. The CDC once provided leadership in this process and appears ready to do so again.

Petaluma and Rohnert Park make use of a customizable program from City Data Services that, among other things, helps streamline the monitoring process by moving it online. This, or a similar system, could help in tracking activities, managing documentation, and generally improving the quality of monitoring while simplifying it.

Essentially all of the housing representatives the Grand Jury interviewed felt that there is not enough staff within their departments to make anyone a full-time compliance monitor. It is easy to suggest hiring more people, but that is especially unlikely to happen in the smaller cities due to budget restrictions. The Grand Jury believes it could be advantageous for the County and cities to cooperate by jointly using (and paying proportionately) staff to monitor countywide. Alternatively, the agencies could jointly contract with a consulting firm to do the monitoring. This would benefit the smaller cities in particular, since they have small staff sizes and fewer monitoring obligations that are more likely to be overlooked.

If self-reporting is to remain the main source of compliance information, it is important that those who collect and report it are adequately trained to compile the data. The people who do the reporting need to know how and why monitoring is important and necessary. The CDC, in conjunction with the Cities, could create an informational document or policy and procedures manual to provide upfront and ongoing training in the monitoring process.

CONCLUSION

Monitoring of compliance with the rules and regulations of Affordable Housing programs is complex. Responsibility lies with individual housing departments in the County and its nine cities. Staffing in these agencies is often insufficient, and there is little coordination amongst these organizations. Monitoring in general and on-site monitoring in particular have long been low priority. Requirements have been largely met by accepting self-reported data from owners and managers of apartment and housing units. The COVID-19 pandemic and the restrictions imposed in response to it placed almost total reliance on self-reported information. Systems that are already overburdened do not appear to be prepared for the large increases in Affordable Housing that are planned for the near future.

FINDINGS

The Sonoma County Civil Grand Jury determined that:

- F1. Monitoring of compliance with Affordable Housing regulations has been inconsistent and often inadequate.
- F2. The use of self-reported data in monitoring is the accepted norm.
- F3. On-site (in-person) monitoring beyond that required by law is rare due to insufficient personnel, budgetary limitations, and relatively low incentives.
- F4. COVID-19 further reduced in-person on-site monitoring due to public health restrictions.

- F5. Surprise or unscheduled monitoring of individual units is not done, for reasons of privacy, availability, efficiency, and practicality.
- F6. Unscheduled monitoring of properties and management, in order to review tenant files, grounds, and the amenities is not done.
- F7. The Community Development Commission has informational documents and policies to provide upfront training in the monitoring process.
- F8. There is limited or no standardized training in Affordable Housing compliance regulations for developers and managers of inclusionary housing within the nine Cities.
- F9. The cities of Petaluma and Rohnert Park use computerized compliance monitoring programs to facilitate and improve the quality of their work.
- F10. The property titles of Affordable single-family houses have not always been flagged as deed restricted.
- F11. The majority of the housing representatives the Grand Jury interviewed felt that there is not enough staff within their departments to make anyone a full-time compliance monitor.

RECOMMENDATIONS

The Sonoma County Civil Grand Jury recommends that:

- R1. By December 31, 2022, the Sonoma County Community Development Commission and the nine Cities meet and develop agreed-upon standards and procedures for the monitoring of Affordable Housing. (F7, F8)
- R2. The Sonoma County Community Development Commission and the nine Cities resume on-site monitoring by October 1, 2022. (F3, F4)
- R3. By January 1, 2023, the Sonoma County Community Development Commission and the nine Cities review and ensure that they have sufficient personnel to conduct on-site monitoring and process self-reported monitoring data to meet future Regional Housing Needs Allocations. (F1, F2, F3, F5, F6, F11)
- R4. The Sonoma County Community Development Commission use informational documents and policies to provide ongoing training in the monitoring process for developers and managers of Affordable Housing projects by January 1, 2023. (F7)
- R5. By January 1, 2023, the nine Cities develop informational documents and policies to provide both upfront and ongoing training in the monitoring and compliance procedures for developers and managers of Affordable Housing projects. (F8)
- R6. By November 1, 2022, the nine Cities meet and discuss to jointly or individually utilize Affordable Housing monitoring software. (F9)
- R7. By November 1, 2022, the nine Cities meet and discuss pooling resources to fulfill their monitoring responsibilities, through either a consultant or designated employees. (F11)
- R8. By December 31, 2022, the Sonoma County Community Development Commission and the nine Cities should update and maintain their inventory of Affordable houses within their jurisdictions and verify that all their property titles are flagged for restricted sale. (F10)

REQUIRED RESPONSES

Pursuant to Penal Code §§ 933 and 933.05, the Grand Jury requires responses as follows:

- Sonoma County Community Development Commission (R1, R2, R3, R4, R8)
- City of Cloverdale (R1, R2, R3, R5, R6, R7, R8)
- City of Cotati (R1, R2, R3, R5, R6, R7, R8)
- City of Healdsburg (R1, R2, R3, R5, R6, R7, R8)
- City of Rohnert Park (R1, R2, R3, R5, R6, R7, R8)
- City of Santa Rosa (R1, R2, R3, R5, R6, R7, R8).
- City of Sebastopol (R1, R2, R3, R5, R6, R7, R8)
- City of Sonoma (R1, R2, R3, R5, R6, R7, R8)
- City of Petaluma (R1, R2, R3, R5, R6, R7, R8)
- Town of Windsor (R1, R2, R3, R5, R6, R7, R8)

The governing bodies indicated above should be aware that their comments and responses must be conducted subject to the notice, agenda and open meeting requirements of the Brown Act.

BIBLIOGRAPHY

- Affordable Housing Online [Affordable Housing Online](#)
- Sonoma County, California – Code of Ordinances, *Article 89 – Affordable Housing Program Requirements & Incentives*, February 8, 2022 [Affordable Housing Program Requirements and Incentives](#)
- County of Sonoma, Community Development Commission [Sonoma County Community Development Commission](#)
- Sonoma County Five-Year Strategic Plan 2021-2025 <https://socostrategicplan.org/>
- Sonoma County Board Of Supervisor Agenda 12/7/2021, Consent Calendar Item 2021-1179, Sonoma County Community Development Commission - Affordable Rental Housing Monitoring Procedures [Attachment 1-Existing Procedures Manual \(not amended at this time\), with Exhibits Summary Report](#)
- Association of Bay Area Governments [Association of Bay Area Governments](#)
- Association of Bay Area Governments, RHNA – Regional Housing Needs Allocation [Regional Housing Needs Allocation](#)
- Association of Bay Area Governments, Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031, December 2021 [ABAG Regional Housing Needs Allocation \(RHNA\) Plan 2023-2031](#)
- Jennifer Hernandez, Chelsea Maclean, Daniel Golub and Paloma Perez-McEvoy, *California Housing Resources Handbook*, 2020 <https://housingactioncoalition.org/wp-content/uploads/2020/05/HK-Housing-Handbook-2020.pdf>
- U.S. Department of Housing and Urban Development [U.S. Department of Housing and Urban Development](#)
- Ethan Varian and Andrew Graham, *Gallaher companies to pay \$500,000 to settle claim from whistleblower who alleged affordable housing fraud*, The Press Democrat, August 21, 2021 [Gallaher Companies To Pay 500000 To Settle Claim From Whistleblower](#)

- Ethan Varian and Andrew Graham, *Former Gallaher employees at Santa Rosa apartment complex say they were pushed to take part in housing fraud schemes*, The Press Democrat, September 3, 2021 [Former Gallaher Employees At Santa Rosa Apartment Complex](#)
- Ethan Varian and Andrew Graham, *In wake of newspaper investigation, Sonoma County launches review of affordable housing oversight*, The Press Democrat, October 9, 2021 [In Wake Of Newspaper Investigation Sonoma County Launches Review Of Affordable Housing](#)
- Ethan Varian and Andrew Graham, *Sonoma County to bolster oversight of affordable housing compliance after Press Democrat investigation*, The Press Democrat, December 8, 2021 [Sonoma County To Bolster Oversight Of Affordable Housing Compliance](#)
- Press Democrat Staff, *Press Democrat affordable housing investigation wins James Madison Award*, The Press Democrat, March 16, 2022 [Press Democrat affordable housing investigation wins James Madison Award](#)