



**CITY OF HEALDSBURG**  
**CITY MANAGER'S OFFICE**

401 Grove Street  
Healdsburg, CA 95448-4723

Phone: (707) 431-3317  
Fax: (707) 431-3321

Visit us at [www.healdsburg.gov](http://www.healdsburg.gov)

September 8, 2022

Honorable Shelly Averill  
Presiding Judge  
County of Sonoma, Superior Court  
Hall of Justice  
600 Administration Drive  
Santa Rosa, CA 95403

**RE: City of Healdsburg Response to 2021-2022 Final Report Sonoma County Civil Grand Jury**

Dear Honorable Judge Averill:

This letter serves as the City of Healdsburg's response to the 2021-2022 Final Report of the Sonoma County Civil Grand Jury. In accordance with Section 933.05 of the California Government Code, please find the attached responses to the Grand Jury reports on Affordable Housing: Past, Present and Future and Affordable Housing: Monitoring and Compliance.

The City of Healdsburg is committed to providing safe, decent, and affordable housing opportunities for its residents and welcomes the opportunity to collaborate, improve processes, and increase the production of housing in our City and Sonoma County.

Should you have any questions or require any additional information, I can be reached at [ojimenez@Healdsburg.gov](mailto:ojimenez@Healdsburg.gov).

Sincerely,

Osvaldo Jimenez  
Mayor, City of Healdsburg

## Response to the Grand Jury Report

Report Title: Affordable Housing: Monitoring and Compliance

Report Date: June 14, 2022

Response By: Oswaldo Jimenez Title: Mayor

Agency/Department Name: City of Healdsburg

FINDINGS: F1, F2, F3, F4, F5, F6, F7, F8, F9, F10, F11

I (we) agree with the findings numbered: **F1, F2, F3, F4, F5, F6, F7, F8, F9, F 10 & F11**

I (we) disagree wholly or partially with the findings numbered:

(Attach a statement specifying any portion of the finding(s) that are disputed with an explanation of the reasons.)

**RECOMMENDATIONS:** R1, R2, R3, R4, R5, R6, R7, R8

- Recommendations numbered: **R6 & R8** Have been implemented (Attach a summary describing the implemented actions).
- Recommendations numbered: **R2, R3, R5, R6, R7** have not yet been implemented but will be implemented in the future (Attach a timeframe for the implementation).
- Recommendations numbered **R1** require(s) further analysis. (Attach an explanation and the scope and parameters of an analysis or study, and a timeframe of the matter to be prepared for discussion by the officer or director of the agency or department being investigated or reviewed including the governing body of the public agency where applicable. ***This timeframe shall not exceed six months from the date of publication of the Grand Jury report.***)
- Recommendations numbered: **N/A** will not be implemented because they are not warranted or are not reasonable. (Attach an explanation).

Date: September 7, 2022

Signed: 

Number of Pages attached: 4

RESPONSE TO THE GRAND JURY REPORT: AFFORDABLE HOUSING MONITORING AND COMPLIANCE, CITY OF HEALDSBURG

<b>Item</b>	<b>Position</b>	<b>Finding</b>	<b>Response</b>
<b>F1</b>	Partially Agree	Monitoring of compliance with Affordable Housing regulations has been inconsistent and often inadequate	The City does have compliance requirements for all its affordable units. These requirements are memorialized through regulatory agreements that include tenant rent certification, annual reports and inspections, and record retention requirements. Many affordable housing projects have multiple layers of project monitoring, especially when several sources of funding are utilized. The City does agree that across different funding programs and across the County, there is no one consistent standard.
<b>F2</b>	Partially Agree	The use of self-reported data in monitoring is the accepted norm	The City partially agrees with this finding. Developers are responsible for monitoring requirements as memorialized in regulatory agreements. All affordable homeownership units are deed-restricted and are managed by the Housing Land Trust of Sonoma County. Developers do self-report but with clear and specific requirements and third-party audits.
<b>F3</b>	Agree	On-site (in-person) monitoring beyond that required by law is rare due to insufficient personnel, budgetary limitations, and relatively low incentives	The City does not currently have the resources to conduct annual on-site inspections for all its affordable housing properties. The City, however, is in the process of hiring a full-time position in the Housing Department that will assume on-site monitoring responsibilities as needed and as required.
<b>F4</b>	Agree	COVID-19 further reduced in-person, on-site monitoring due to public health restrictions	On-site monitoring was either waived or requirements were suspended during the COVID-19 pandemic by most funding agencies; however, reporting was not suspended, which still provides the information necessary to determine program compliance.
<b>F5</b>	Agree	Surprise or unscheduled monitoring of individual units is not done, for reasons of privacy, availability, efficiency, and practicality	The City always strives to respect the privacy and equitable treatment of tenants in affordable housing units and therefore, noticing is required prior to entering residences.
<b>F6</b>	Partially Agree	Unscheduled monitoring of properties and management, in order to review tenant files, grounds, and the amenities is not done.	While the City does not have a program for unscheduled monitoring of properties, staff does conduct visual inspections of its affordable housing inventory. If the City does receive a complaint from a tenant, it will request documentation from the property owner outside of the normal reporting required in the regulatory agreement(s) to determine compliance. The ability to conduct unscheduled monitoring is preserved in regulatory agreements.
<b>F7</b>	Agree	The Community Development Commission has informational	The City agrees with this finding.

RESPONSE TO THE GRAND JURY REPORT: AFFORDABLE HOUSING MONITORING AND COMPLIANCE, CITY OF HEALDSBURG

	documents and policies to provide upfront training in the monitoring process.	
<b>F8</b>	Agree There is limited or no standardized training in Affordable Housing compliance regulations for developers and managers of inclusionary housing with the nine Cities.	Expectations on monitoring and compliance are outlined in the City's Regulatory Agreements and the City meets with each developer to review such agreements; however, these are one-on-one meetings and not a formalized training program. The City would participate in any training related to affordable housing compliance.
<b>F9</b>	Agree The cities of Petaluma and Rohnert Park use computerized compliance monitoring programs to facilitate and improve the quality of their work.	The City agrees with this finding.
<b>F10</b>	Partially Agree The property titles of Affordable single-family houses have not always been flagged as deed restricted.	The City of Healdsburg requires covenants on all its for-sale housing. The City retains the Housing Land Trust of Sonoma County to monitor the City's for-sale housing stock. The City partially agrees as it cannot speak for other jurisdictions.
<b>F11</b>	Agree The majority of the housing representative the Grand Jury interviewed felt that there is not enough staff within their departments to make anyone a full-time compliance monitoring	The City Agrees with the finding. The City is in the process of hiring a full-time employee in the Housing Department to address this need.

RESPONSE TO THE GRAND JURY REPORT: AFFORDABLE HOUSING: MONITORING AND COMPLIANCE, CITY OF HEALDSBURG

<b>Item</b>	<b>Status</b>	<b>Recommendation</b>	<b>Response</b>
<b>R1</b>	Further Analysis	By December 31, 2022, The Sonoma County Community Development Commission and the nine Cities meet and develop an agreed-upon standards and procedures for the monitoring of Affordable Housing.	The recommendation requires additional analysis as one standard may not apply to all funding programs or agreements, especially if deed-restrictions involve local programs, such as the City of Healdsburg's Measure P units that serve residents up to 160% of AMI. The City is more than willing to meet, and already has met, with the County and other cities to discuss monitoring. The City feels that the County is in the best position to spearhead this effort.
<b>R2</b>	Will be Implemented	The Sonoma County Community Development Commission and the nine Cities resume on-site monitoring by October 1, 2022.	The City is currently hiring a full-time position in the Housing Department that will be responsible for monitoring activities. The City will resume on-site monitoring by October 1, 2022.
<b>R3</b>	Will be Implemented	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.	The City adopted a Housing Department budget that includes funding for monitoring activities and will hire a full-time employee to oversee the program.
<b>R5</b>	Will be Implemented	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.	The City has will hire a full-time position in the Housing Department that will be responsible for monitoring and compliance. The City will continue to implement and will expand upon one-on-one developer meetings to review compliance requirements and will provide technical assistance as needed.
<b>R6</b>	Implemented	By November 1, 2022, the nine Cities meet and discuss to jointly or individually utilize Affordable Housing monitoring software.	The recommendation has been implemented. The County has already scheduled these meetings. The City is open to utilizing software for monitoring if the benefit of the software merits the cost and if it is suitable to the needs of the City.
<b>R7</b>	Will be Implemented	By November 1, 2022, the nine Cities meet and discuss pooling resources to fulfill their monitoring responsibilities,	The City is willing to and already has collaborated on regional solutions for affordable housing monitoring. The County would be in the best position to lead this effort.

RESPONSE TO THE GRAND JURY REPORT: AFFORDABLE HOUSING: MONITORING AND COMPLIANCE, CITY OF HEALDSBURG

	<p>through either a consultant or designated employees.</p> <p>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.</p>	
<p>Implemented</p>		<p>All of the City's Affordable housing properties are deed restricted.</p>

**R8**