



# City of St. Louis

## HOME-ARP Allocation Plan

*June 2023*

*Amended Draft-November 2025*

*Revised 4/15/2026*



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# Overview

*The American Rescue Plan (ARP) appropriated \$5 billion nationwide to provide housing, services, and shelter to individuals experiencing homelessness and/or housing insecurity. In September 2021, the U.S. Department of Housing and Urban Development (HUD) awarded the City of St. Louis \$10,635,523 in HOME-American Rescue Plan Act of 2021 ("HOME-ARP") funding made available through the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan ("ARP") (Pub. L. No. 117-2). Eligible activities include the acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and non-profit operating and capacity building assistance.*

*To utilize HOME-ARP funding, the City of St. Louis has developed and submitted this HOME-ARP Allocation Plan in accordance with the requirements of HUD's Community Planning and Development (CPD) Notice 21-10. The following pages summarize the City's consultation with key stakeholders, community engagement, needs assessment and gaps analysis, and planned uses of HOME-ARP funding. This plan will serve persons of all four requisite Qualifying Populations (QP), which include:*

- **Homeless** (as defined in 24 CFR 91.5)
- **At-risk of Homelessness** (as defined in 24 CFR 91.5)
- **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking** (As defined in 24 CFR 5.2003, or outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102))

- **Other Populations Requiring Services or Housing Assistance to Prevent Homelessness or that are At Great Risk of Housing Instability** (As defined under section 212 (a) of NAHA (42 U.S.C. 12742(a)))

*The City of St. Louis recognizes housing as a human right and is committed to ensuring that all St. Louisans have access to safe, stable, and affordable housing. An unprecedented allocation of federal funds, including HOME-ARP and SLFRF funds, presents a unique opportunity to make a historic investment into affordable housing. We must begin, however, by recognizing our history as one of the most racially and economically segregated cities in the country. Generations of restrictive covenants and redlining have transformed the city's real estate market into an engine of oppression, leaving scars like the Delmar Divide, collapsed homes, vacant lots and appraisal gaps etched into the fabric of St. Louis.*

*Data, much of it detailed in this report, tells us that our city faces a series of intersecting housing challenges including homelessness, affordability, and home-ownership, each of which exhibits deep racial disparities. The City's FY22 Point In Time (PIT) count identified 1,147 unhoused individuals in the City of St. Louis, including 1,048 sheltered individuals, and 263 chronically homeless individuals. Black American people are disproportionately represented, making up 71% of the city's unhoused population, despite representing 46% of the city's total population. According to Comprehensive Housing Affordability Strategy data, which was collected for the period from 2013 to 2017, shows that-Black Americans are also disproportionately represented in the city's population of 37,000 cost burdened tenant households, who pay thousands more than they can afford in rent each year and are one eviction away from homelessness. Finally, Census data tells us that the city lost an*

*aggregate 17,000 residents between 2010 and 2020, but more than 27,000 Black American residents. Many residents are leaving due to a lack of affordable home ownership opportunities.*

*In order to reverse decades of disinvestment in marginalized communities, and ensure that all St. Louisans have access to safe, stable, and affordable housing, the City is committed to leveraging HOME-ARP, CDBG, HOME, SLFRF, and other state and local funds to make a historic investment in affordable housing. By coordinating and concentrating funds to catalyze neighborhood transformation, and by ensuring that all city funded affordable housing meets robust quality standards and includes strong tenant protections, the City of St. Louis can help residents secure safe, affordable housing and make its neighborhoods healthier and more inclusive.*

*HUD guidelines clearly provide that HOME-ARP funds ought to be prioritized to support the city's unhoused population and other qualifying populations. Consultation with a diverse array of community stakeholders has confirmed the extraordinary need in this ecosystem, and has led the city to prioritize funding for: i) construction of permanent supportive housing; ii) supportive services; and iii) rental assistance. Subject to HUD approval of this allocation plan, and to legislative appropriation of HOME-ARP funds, the Community Development Administration will award funds pursuant to a single, competitive Notice of Funding Availability (NOFA) process which will take a project-based strategy to funding awards.*

*The city is simultaneously investing SLFRF funds into the production of affordable rental and for sale housing through the Affordable Housing Trust Fund, St. Louis Development Corporation, Land Reutilization Authority, and Community Development Administration. Our goal is to fund the production of housing as diverse as our city - from permanent supportive housing to affordable rental*

*housing; from scattered site residential infill to large mixed income/mixed use developments; from tiny homes to manufactured housing - in order to address the needs of the city's unhoused and rent-burdened residents and chart a course towards neighborhood revitalization and growth.*

*On May 16, 2025, an intense and destructive tornado hit St. Louis City destroying hundreds of houses and housing units in a 20 mile path of destruction. Damage has been estimated will over \$1.6 billion. The first deadly tornado in St. Louis since 1959.*

*This tornado put many of the citizens at risk of being homeless, and for some actually homeless. Surveys and FEMA records has determined more than 5,000 individuals and families have been displaced, unhoused, or at risk of being homeless as a result of the tornado. Therefore, CDA is now adding "at risk homeless" as a priority to service these tornado victims with Rental Assistance under the HOME-ARP Services Funding. This support will provide 24 months of rental assistance to include first and last month rents.*

## Consultation

In September 2021, the City of St. Louis began to discuss its vision for HOME-ARP funding. The Community Development Administration (CDA), Department of Human Services (DHS), and the Mayor's Office conducted initial internal meetings to discuss the most effective use of the one-time HOME-ARP allocation. Since then, the City of St. Louis has engaged citizens, agencies, and local stakeholders in the planning process.

CDA first distributed an online survey to St. Louis Continuum of Care (CoC) members in Spring 2022. The survey asked each organization to highlight their primary areas of service and provide feedback on their preferred use of HOME-ARP funding, the results of this survey can be found in Exhibit A below. Next, CDA held a virtual stakeholder meeting with members and leaders of the St. Louis Housing Authority and St. Louis CoC to discuss their needs and priorities for HOME-ARP funding. The CDA consulted with the CoC board on September 8, 2022.

Service providers who work with HUD's four qualifying populations were also consulted, including domestic/partner violence, disability, shelter, and fair housing providers. CDA spent Fall of 2022 seeking out these community organizations and consulting their expertise. The list of organizations and a summary of their respective feedback has been included in the table below.

CDA's consultations made two things very clear: there is an extremely high demand for quality, affordable housing—and an insufficient supply of such units. Internally, DHS and the City of St. Louis Mayor's Office echoed support for the use of funds for affordable rental, supportive services, and permanent supportive housing. These consultations reinforced that

the City of St. Louis urgently needs housing that is safe, affordable, accessible, and permanent. Many service providers urged the City to consider the delivery of supportive services; security measures and general neighborhood safety; and accessibility to grocery stores, transportation, restaurants, community services, and recreation in its plans. They also encouraged the City to include universal design in new builds or extensive modification to existing structures to create affordable, quality housing that is accessible to individuals and families of different ages, demographics, and needs.

A table of the organizations consulted is included on the following pages. CDA will continue to solicit feedback from the St. Louis community regarding how to best use HOME-ARP funds.

We will continue to solicit feedback through the St. Louis Board of Alderman's appropriation process. The process will include public hearings at the Board's housing, urban development and zoning committee meeting which occurs regularly. Persons with special needs or accommodations relating to handicapped accessibility or foreign language should contact Mr. Tom Nagel via email at [nagelt@stlouis-mo.gov](mailto:nagelt@stlouis-mo.gov) or by phone at (314) 657-3813 or (314) 589-6000 (TDD) to request information or as ask for assistance. Interpreting services are available upon request for persons with hearing disabilities. Interested parties should contact the Office on the Disabled at (314) 622-3686/voice or (314) 622 3693/TTY.

Agency/ Org Consulted	Type of Agency/Org	Method of Consultation	Feedback	Date
Mayor's Office	Government St. Louis City	Meetings	Supported the use of funds for permanent supportive housing, supportive services, and rental assistance.	12/7/2021 1/21/2022 2/11/2022 5/6/2022 12/8/2022
Department of Human Services (DHS)	Government St. Louis City	Meetings	Supported the use of funds for permanent supportive housing, supportive services, and rental assistance.	5/6/2022 11/2/2022, 11/18/2022, 12/8/2022, and 12/15/2022
St. Louis City Continuum of Care (CoC)	Continuum of Care; Homeless service providers; Domestic violence service provider	Online Survey; Virtual Meeting	Supported the use of funds for permanent supportive housing. Members of the CoC also expressed a need for specialized supportive services, such as case management and application support. CoC members emphasized the need for creative solutions to the specific needs of the community's qualifying populations, and the importance of ensuring continuity of services. Finally, CoC members flagged that even the most reliable data sources underestimate the local qualifying populations and their unique needs	9/8/2022 and 9/30/2022
STL Housing Authority (SLHA)	Public Housing Agency	Meeting	Provided feedback regarding the SLHA's needs and priorities, which include funding for the redevelopment of Clinton Peabody, maintenance of Housing Authority buildings, and funding for rental arrears.	6/8/2022

Civil Rights Enforcement Agency (CREA)	Public or private organization that addresses civil rights and fair housing	Meeting	Advised protecting housing choice voucher holders from discrimination and exploring policies to create an inclusive and welcome environment for unhoused transgender individuals.	6/30/2022
Commissioner on the Disabled and ADA Coordinator	Public or private organization that addresses the needs of persons with disabilities	Meeting	Advised that the 5% requirement imposed by 24 CFR 8.22 is a floor; CDA should aim to make 30-50% of its units constructed with HOME-ARP funds to be fully accessible to individuals with disabilities. CDA should also incorporate universal design elements into all housing to ensure accessibility for a greater range of disabilities and mobility constraints.	6/29/2022
Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC)	Public or private organization that addresses civil rights and fair housing (non-governmental)	Meeting	Stressed the need to combat widespread housing discrimination (e.g., trainings re: source of income and general landlord education) and discussed the low stock of affordable housing. Supported construction of additional affordable, quality housing units. Commented on the City's aging housing stock and suggested incentivizing and/or requiring modification of existing buildings or building accessible units to promote independent living for St. Louisans with disabilities. Encouraged a requirement for ESL and auxiliary services to be provided by housing providers at no cost. Supported the idea of a pre-filing mediation	11/11/2022 and 11/21/2022

			requirement to prevent evictions.	
The Women's Safe House (TWSH)	Domestic Violence Service Provider (non-governmental)	Meeting	Supported the use of funds for affordable rental, supportive services, and permanent supportive housing. Suggested geographic variety in housing development and close proximity to grocery stores and services like healthcare, childcare, and education. Stressed that the greatest needs of their clients seeking housing were transportation and financial assistance for utilities.	11/11/2022
Paraquad	Public or private organization that addresses the needs of persons with disabilities (non-governmental)	Meeting	Sees a constant demand for affordable, accessible housing and states there is greater need than there are options. Emphasized the need for bathroom accessibility in addition to elevators and other general accessibility measures. Encouraged any housing development to be in close proximity to public transit, stores, and restaurants. Stressed need for safe, secure housing in a variety of neighborhoods. Recommended avoiding congregate/group housing and encouraged construction of multiple individual or small-scale buildings to provide independence.	11/30/2022

<p>Gateway Housing First Horizon Housing</p>	<p>Continuum of Care Homeless service providers</p>	<p>Joint Meeting</p>	<p>Stated affordable housing has been harder to find in the last 18-24 months than ever before. Relayed that oftentimes, affordable housing does not pass inspection, and housing that passes inspection is not affordable; and accordingly, development of new housing in the next 5 years is critical. Relayed numerous experiences of discrimination against clients, stating concern that landlords can have legally legitimate tenant selection criteria that naturally weed out low-income tenants, voucher holders, and permanent supportive housing candidates. Supported the buildout of additional quality, affordable housing, and emphasized minor rehab as a fast, low cost, high impact way to get more affordable housing units online. Specifically recommended expansion of project-based vouchers and properties with onsite services.</p>	<p>9/30/2022</p>
<p>St. Louis Arc</p>	<p>Public or private organization that addresses the needs of persons with disabilities  (non-governmental)</p>	<p>Meeting</p>	<p>Expressed a dire need for additional affordable, quality housing for individuals and families, citing failed attempts to place clients experiencing domestic violence in housing. Stressed importance of individuals and families being able to live independently and privately without roommates. Affirmed housing should be safe, inclusive, walkable, and in close proximity to public housing. Communicated need for supportive services</p>	<p>12/1/2022</p>

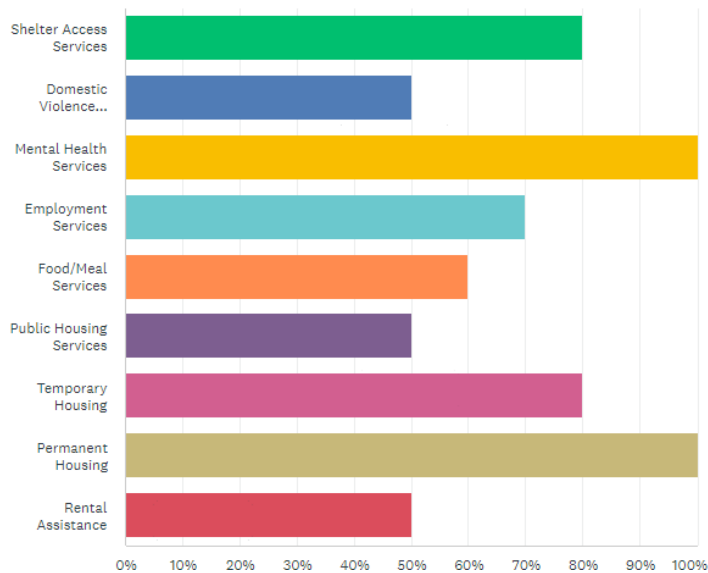
			<p>but stated a lack of available staffing and resources. Encouraged use of universal design and to consider needs of different age groups in planning stages. Stated clients regularly faced housing discrimination and advised measures to combat it. Suggested supportive housing concepts akin to university-style living with affordable units and large community spaces. Expressed a strong preference for housing models that support community engagement in shared spaces. Pointed to Delmar Divine as a local ideal residential model.</p>	
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**Summarize feedback and results of upfront consultation with these entities:**

In a 2022 survey of COC members, 100% of respondents selected permanent housing as a service need in the St. Louis community. When asked about what primary program CDA should consider, “develop new affordable rental housing” and “develop permanent supportive housing” were selected most frequently. These selections are also supported by CoC data on supportive housing needs from 6/14/2022. This data shows more than 750 homeless households actively seeking housing through the CoC –210 of which have reported that they live on the streets. On average, these households have been without shelter for at least 255 days.

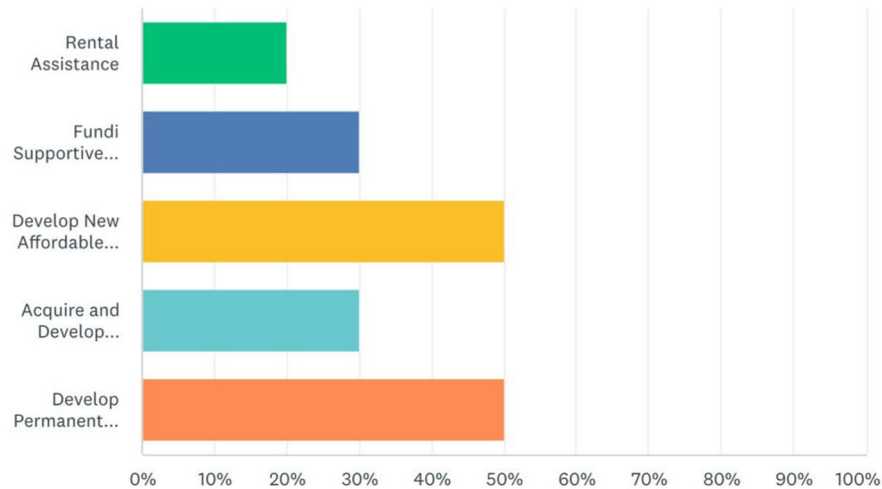
What services are needed in the community you serve?  
Check all that applies.

Answered: 10 Skipped: 0



In a public hearing on June 30<sup>th</sup>, 2022 designed to provide feedback on the HOME-ARP plan, both local housing organizations and members of the CoC expressed a need for specialized supportive services, such as case management and application support. They also expressed the need for continuity in these services, citing concerns for turnover in operations of supportive housing; and a need for creative solutions to the specific needs of the community's qualifying populations, describing how even the most reliable data sources underestimate the local qualifying populations and their unique needs. The city reflected on these comments to revise the plan you see before you to include a greater focus on supportive services. A second public hearing was held on January 25, 2023. At this second hearing the community voiced greater support for the allocation plan.

The City of St. Louis Community Development Administration is considering the following programs for people experiencing homelessness. Please check the primary program to be considered in your community:



*Selection from the 2022 CoC HOME-ARP Survey*

Further conversations with CoC members affirmed their support for building additional affordable, supportive housing units to house persons experiencing homelessness and to provide affordable housing for those at risk of homelessness to move into.

The Commissioner on the Disabled and ADA Coordinator, as well as the Civil Rights Enforcement Agency (CREA), encouraged CDA to surpass the mandatory minimums for constructing its housing units to be accessible for those with mobility impairments, as per 24 CFR 8.22. They offered universal design as a model to make all HOME-ARP projects as accessible and welcoming as possible. The Commissioner on the Disabled and ADA Coordinator for the City of St. Louis specifically envisioned that 25-30% of all units constructed would accommodate individuals living with disabilities. CREA’s vision for

inclusivity also included the recommendation to explore inclusive housing policies to protect housing choice voucher holders from discrimination.

The need for additional permanent housing and supportive services for all the qualifying populations of St. Louis is apparent, and it is a priority for the City and its service providers. All the service providers and civic organizations spoken to agree on these needs which would benefit all qualifying populations. TWSH noted that the greatest supportive needs for victims of domestic violence and sexual assault are transportation and other financial assistance since these Individuals are usually coming from very controlling environments. Paraquad, representing those with mobility challenges require more accessible restrooms, elevators, and other accessible features in housing made available to them.

After the May 2025 Tornado, consultation regarding Tornado Housing Recovery included 15 community residents representing impacted neighborhoods, business leaders, pastors, community leaders, Civic Leaders Advisory Committee, and Tornado Recovery Advisory Committee. The committee met weekly to discuss the tornado impact, housing needs, funding needs, and Recovery Program for the homeless and at risk homeless qualifying populations. Partnership with United Way, American Red Cross, St. Louis Metro Housing Collective, St. Patrick's Center, The Salvation Army, Catholic Charities, Metro Housing Collective, Housing Authority, Continuum of Care, Urban League, STL Housing Search, Housing Options Provided for the Elderly (Hope House), Home Screen by Tower Grove CDC, and Gateway 180 was established to address housing availability. A Landlord Survey receive more than 100 responses including more than 700 units being available to house tornado victims.

## Public Participation

### Describe the public participation process:

The City of St. Louis HOME-ARP Allocation Plan was first shared with the public on June 14th, 2022, when the plan was published on the Community Development Administration website (<http://www.stlouis-mo.gov/cda>), and hard copies were made available at the CDA Offices at 1520 Market Street (Suite 2000). The notice regarding draft availability and public hearing was also posted in various locations and emailed to the CDBG mailing list on June 14, 2022. Advertisements indicating the availability of the draft report, the solicitation of public comments for the draft report, and notice of a public hearing to allow for any comments on the HOME-ARP draft appeared in the St. Louis American on June 16, 2022. To allow for more access from the public, a virtual public hearing (accessible from a computer or personal cell phone) was held on June 30, 2022 for the sake of convenience and proper COVID-19 safety measures.

Following HUD's disapproval of the City's HOME-ARP Allocation Plan, and guidance that that city ought to deepen its consultation, public participation, needs assessment and gap analysis, and clarify that all four qualifying populations will be served by funded activities, the Community Development Administration recommenced consultation and drafting efforts. The updated plan reflects the input detailed under the consultation section above and went through a subsequent public participation process detailed below.

On January 13th, 2022, the revised plan was published on the Community Development Administration website,<sup>1</sup> and hard copies were made available at the CDA Offices at 1520

Market Street (Suite 2000). In addition, a virtual public hearing occurred at 10 AM on January 25, 2023, to gather public comment and feedback.

- Date(s) of public notice 1/14/2023
- Public comment period: 1/14/2023 through 1/30/2023
- Date(s) of public hearing: 1/25/2023
- Date of plan submission: 1/31/2023
- In response to further feedback from the community stakeholders including the Department of Human Services and the Continuum of Care, the plan was again updated to include the ability to use funds to address urgent community needs and more quickly provide supportive services to qualifying populations in order to prevent their displacement. On November 7, 2024, the updated plan was published on the Community Development Administration website, and hardcopies were made available at the CDA Offices at 1520 Market Street (Suite 2000). In addition, a virtual public hearing occurred at 10AM on November 15, 2024, to gather public comment and feedback.
- Date of public notice: 11/7/2024
- Public comment period: 11/7/2024-11/22/2024
- Date of Public Hearing: 11/15/2024
- Public hearing for 11/21/2025 Substantial Amendment in reference to adding tornado victims as a preference has not yet been set due to the Federal Government shut down. Pursuant to 24 CFR 91.50, HUD inaction results in automatic approval after 45 days. (“The plan will be deemed approved 45 days after HUD receives the plan, unless before that date HUD has notified the jurisdiction that the plan is disapproved.”) Of course, HUD disapproval would significantly delay the project.

## **Describe efforts to broaden public participation:**

Advertisements indicating the availability of the draft report, the solicitation of public comments for the draft report, and notice of a public hearing to allow for any comments on the HOME-ARP draft appeared in the St. Louis Post-Dispatch on January 14, 2023. The notice regarding draft availability and public hearing was also posted in various locations and emailed to the CDBG mailing list. To support accessibility and maximize attendance, a virtual public hearing (accessible from a computer or personal cell phone) was held on January 25, 2023 for the sake of convenience and proper COVID-19 safety measures.

## **Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:**

All public comments will be uploaded as attachments to the HOME-ARP Allocation Plan. Comments and recommendations made in the initial June 2022 public comment period overwhelmingly called for the development of additional affordable housing in the City of St. Louis. One especially notable public comment came from the Institute for Community Alliances, which provided detailed data analysis attesting to the need for “affordable supportive housing for persons experiencing homelessness.” Various city residents also stressed the importance of diverse affordable housing options and ensuring that affordable housing has access to amenities and services like healthcare, food, and public transportation. The city heard these comments, which clearly confirmed an assessment of need in the community and revised the plan to include not just new constructions but a wide range of supportive services. Consultation with the public and partner organizations drove this reform.

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<sup>1</sup> <https://www.stlouis-mo.gov/government/departments/community-development/documents/home-arp-plan-draft.cfm>

The January 25, 2023 public hearing received comments from numerous organizations and individuals. Comments covered the implementation of master leases, which the City under HUD's advice is planning to implement. Several other commenters expressed a desire to see more selective rehabilitation, as opposed to new construction. Discussions of the bundling of HOME-ARP with other Federal funding sources and the leveraging of the projects to be undertaken with these funds were another point of discussion at the hearing.

All public notices and public hearing information for the November 2025 HOME-ARP Substantial Amendment responding to support and services for the May 2025 tornado "at-risk" and "homeless" victims will be uploaded as attachments to the 2023 Allocation Plan. There were no public comments made.

**Summarize comments/recommendations not accepted and state why:**

No comments or recommendations have been rejected at this time. The City of St. Louis sought to incorporate broad community input to build its HOME-ARP allocation plan. All comments and recommendations were received, accepted, and considered during the HOME-ARP planning process. This is borne out by the changes made to plan over the past six months in response to community input for greater supportive services.

## Needs Assessment and Gaps Analysis

The Needs Assessment and Gaps Analysis examines the size and composition of qualifying populations, identifies current resources available, assesses unmet housing and services needs, and calls attention to existing gaps in services provided.

The Housing Continuum model represents the different types of housing available and shows the range of housing types available in the community – from emergency shelters and transitional housing on one end to affordable and market-rate housing. Permanent Supportive and Community housing is best defined as affordable housing with additional wrap-around supportive services and rental assistance available to meet the needs of chronically unhoused individuals.

As individuals and families are able to progress on the Housing Continuum model when they are connected with services, attain and complete traditional and/or vocational education, gain increased income and stability through improved employment, and establish savings. As they move left, they may face a combination of short and long-term challenges: domestic abuse, financial strain, addiction, physical or mental health crises, job loss, etc.



<sup>2</sup> Image c/o Canada Mortgage and Housing Corporation

The need for additional affordable housing is reflected in the 2022 Point in Time (PIT) Census Count and Housing Inventory Charts, which reflects an estimated number of individuals experiencing homelessness on a single night. Each year, in accordance with HUD requirements, Continuums of Care (CoCs) across the country conduct a census of persons experiencing homelessness. This process, called the Point-in-Time (PIT) count, collects information on sheltered and unsheltered persons experiencing homelessness including demographic information. By itself, the PIT Count is not a reliable predictor of how many people are unhoused or receive housing assistance; however, in conjunction with other data, it can provide essential information on the current and long-term trends in homelessness. The below tables are PIT reflections of St. Louis' QPs as well as their service utilization.

## Homeless Needs Inventory and Gap Analysis Table

	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (1+ child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Unit s	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	166	52	435	-	2								
Transitional Housing	140	62	184	-	101								
Permanent Supportive Housing	701	210	1120	-	273								
Rapid Rehousing	329	103	98	-	37								
Other Permanent Housing	0	0	69	0	10								
Sheltered Homeless						92	744	116	75				
Unsheltered Homeless						-	92	7	3				
<i>Current Gap</i>										92	-	1037	-

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC);

## Housing Needs Inventory and Gap Analysis Table

<b>Non-Homeless</b>			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	79,535		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	27,070		
Rental Units Affordable to HH at 50% AMI (Other Populations)	13,925		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		21,310	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		10,605	
<i>Current Gaps</i>			31,915

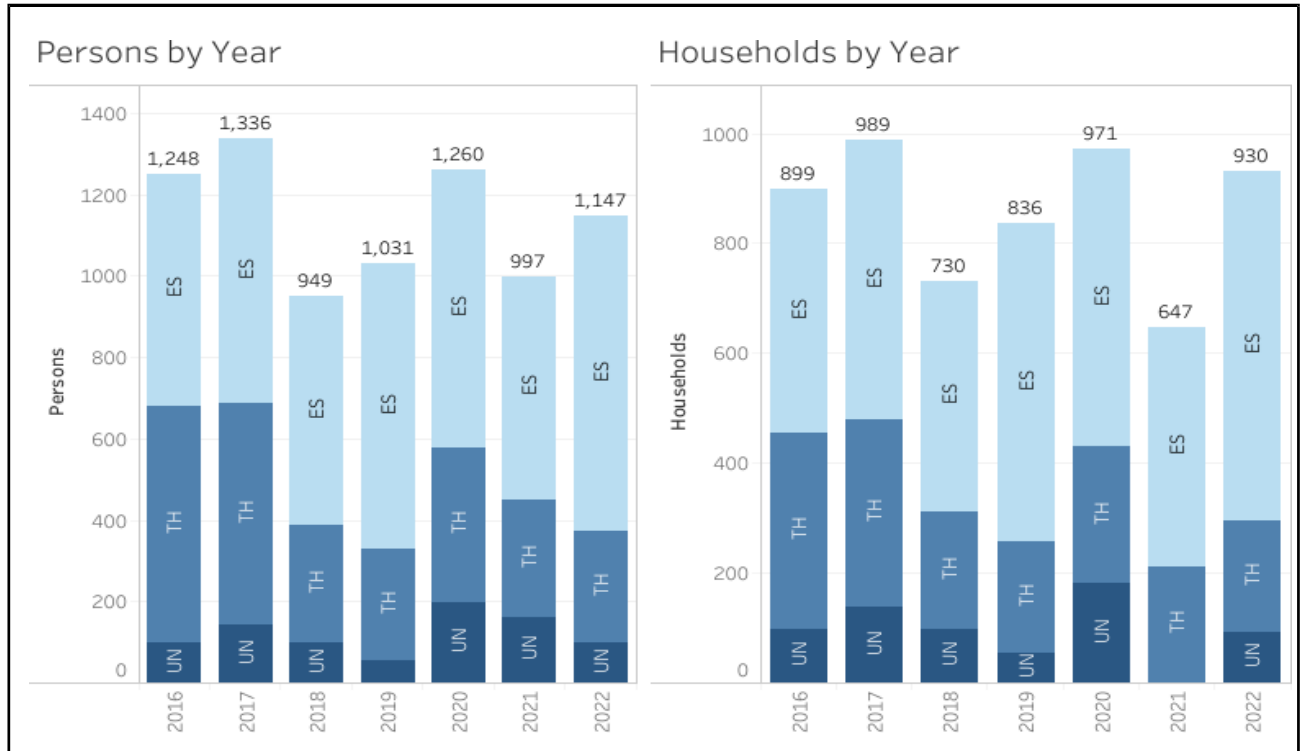
Data Sources: 1. Comprehensive Housing Affordability Strategy (CHAS)

## Describe the size and demographic composition of qualifying populations:

### Homeless

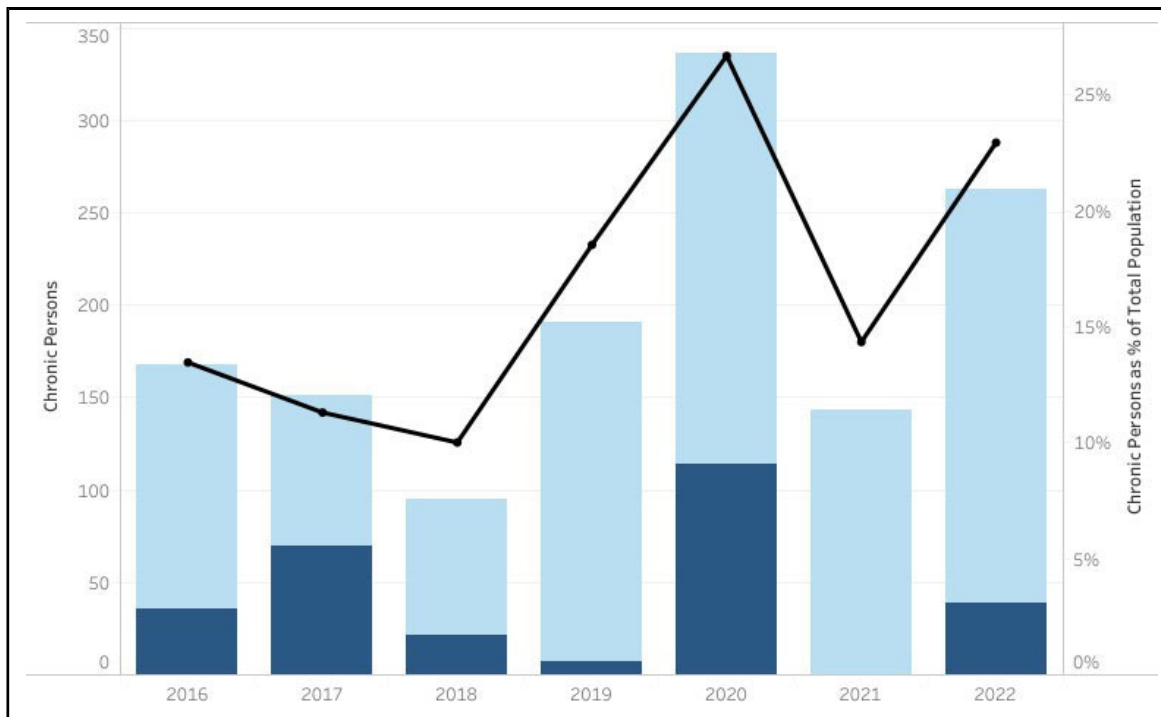
The 2022 Point in Time (PIT) count recorded 1,147 persons who are experiencing homelessness in St. Louis City. A total of 1,048 persons were counted as "sheltered homeless," with 775 persons residing in emergency shelters and 273 individuals residing in transitional housing. Of the 1,048 individuals, 682 identified as male, 356 identified as female, and 10 identified as transgender. Additionally, 861 were individuals over the age of 24, and 263 were identified as being chronically homeless, with a majority of individuals listed as unsheltered. Veterans represented 123 persons experiencing homelessness. Further, of the 1,147 unhoused individuals, 811 persons are Black Americans (70.7%) and 281 White (24.4%). Census.gov reports that the current racial makeup of the City is 45.7% Black American and 46.4% White; however, the number of Black Americans in St. Louis who are experiencing homelessness is almost quadruple that of White individuals. The 2022 PIT Count, as well as chronic homelessness and veteran homelessness rates can be seen on the following pages. As detailed further in Exhibit A to this allocation plan, thousands of households were displaced by the tornado, and hundreds are now homeless.

## St. Louis City PIT Count 2022

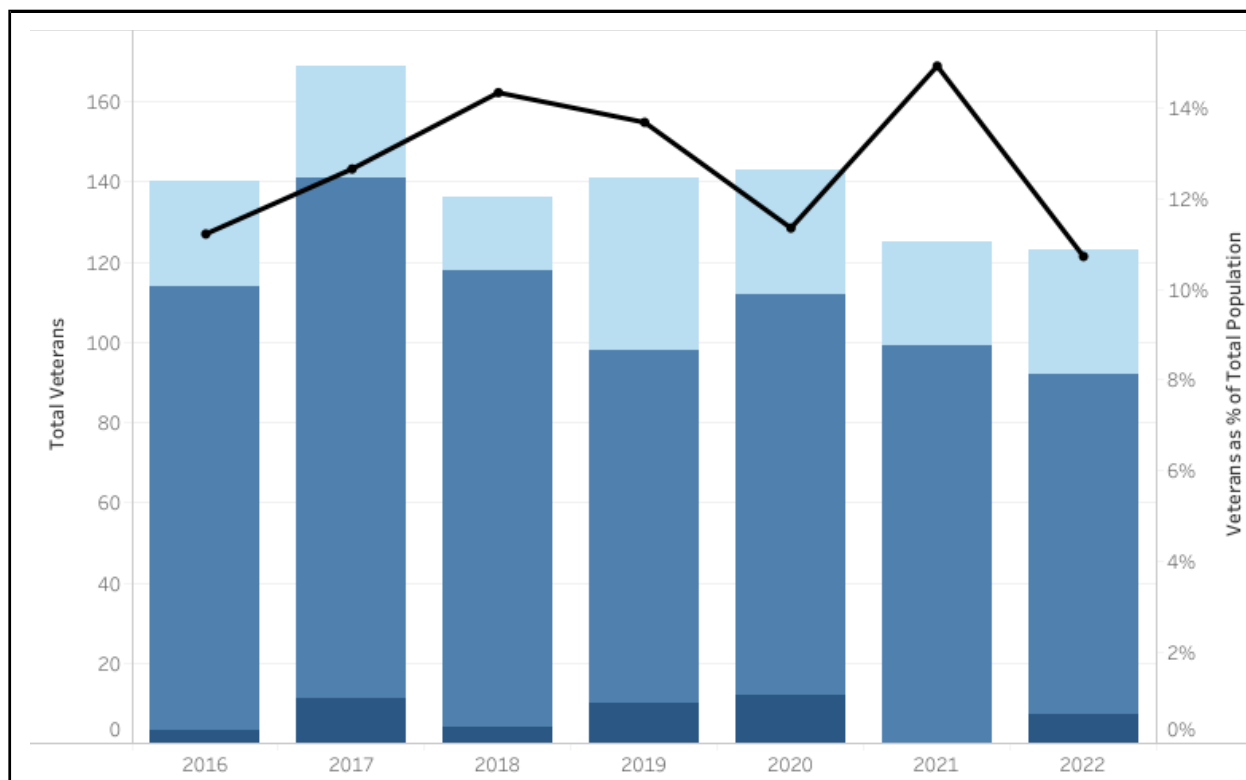


Data Source: Institute for Community Alliances

## St. Louis City Chronic Homelessness (2022)



### St. Louis City Veteran Homelessness (2022)



Data Source for both charts: Institute for Community Alliances

The following table reflects FEMA Individual Assistance (IA) Data as of September 19, 2025. Households and individuals impacted as a secondary residence, new permanent rental, and new home purchase categories in the table are excluded from households that would qualify as “homeless” or “at-risk” homeless. This would make the grand total account for households surveyed related to the qualifying population 10,952 and FEMA Rental Assistance HH Count 1,541. After surveying the community, **The St Louis City Housing Taskforce** produced a **Tornado Housing Recovery Update** to the local Housing, Urban Development & Zoning Committee on September 30<sup>th</sup>, 2025. This document reported the prior conditions before the tornado, the tornado impact, housing needs, available recovery programs, and funding needs after the tornado. **MOSAVE Assessments** surveyed damaged buildings as a result of the tornado and found a total of 16,077 impacted buildings. The buildings surveyed included residential, commercial, industrial, Land Reutilization Authority (LRA) buildings and other privately owned buildings.

<i>Tornado Impact: City of St. Louis FEMA IA Data (9-19-25)</i>					
Current Location	Total Household Count	FEMA Rental Assistance HH Count	Avg. FEMA Award (Excluding No Award)	Avg. Gross Income (Self-Reported)	Habitability Repairs Needed
Homeless	215	41	\$5,051	\$21,869	74
Tent	21	6	\$15,208	\$15,748	14
My Vehicle	94	36	\$7,140	\$36,397	56
Unknown	160	0	\$10,986	\$44,128	0
Mass Shelter	82	34	\$7,091	\$18,315	49
Church	3	1	\$35,810	\$20,000	2
Place of Employment	5	1	\$6,248	\$36,500	3
Hotel/Motel	392	119	\$7,715	\$35,306	222
Damaged Dwelling	7,102	457	\$4,215	\$76,005	2,633
Family/Friends	2,390	608	\$8,883	\$41,546	1,547
RV	4	1	\$13,605	\$15,802	3
Temporary Rental Unit	484	237	\$10,318	\$51,595	352
Secondary Residence	143	10	\$13,483	\$58,532	35
New Permanent Rental	313	151	\$6,998	\$41,351	227
Purchased New Home	12	1	\$4,628	\$95,785	2
<b>Grand Total</b>	<b>11,420</b>	<b>1,703</b>	<b>\$5,871</b>	<b>\$63,408</b>	<b>5,219</b>
*Need to follow up for updated location	*25,979 individuals	*74 approved for CTHA	*\$23.5M in FEMA Housing Asst. Awarded	*45% <30% AMI	*2,794/2,425 Owners/Renters

Persons at risk of Homelessness:

Pursuant to the HOME-ARP Notice (CPD-21-10), HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, and live with instability (e.g., moving two or more times during the last 60 days due to economic reasons). HUD further defines a child or youth who qualifies as “homeless” under the Runaway & Homeless Youth Act, the Violence Against Women Act, the Public Health Service Act, the Food & Nutrition Act of 2008, or the Child Nutrition Act of 1966, or a child or youth who does not qualify as “homeless” under the McKinney-Vento Act as being at risk of homelessness. This qualified population is further defined at 24 CFR 91.5.

## **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

Pursuant to the HOME-ARP Notice (CPD-21-10), HUD has defined this population as including any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

The City of St. Louis recorded 78 individuals who identified as survivors of domestic violence in its most recent PIT count. There were 75 individuals sheltered and 3 individuals unsheltered. However, 2021 data from the Missouri Coalition Against Domestic and Sexual Violence (MOCADSV) reveals a greater need for housing and services in the St. Louis region. This data is inclusive of both the City of St. Louis and the county; but because of the geographic compactness of the region, and because many services are provided within the city, MOCADSV provides a meaningful reflection of need.

Throughout 2021, 6,345 women, 1,031 children, 504 men, and 380 unspecified individuals received services as domestic violence survivors. The majority of these individuals were Black Americans (56%) followed by White (27%), Unknown (12%), Latino/Hispanic (2%), Multiracial (2%), and Asian, American Indian/Alaska Native, Native Hawaiian or Other Pacific Islander (1%). A total of 26,877 bednights of emergency shelter and 31,584 bednights of transitional housing (defined by MOCADSV as longer-term, independent housing for victims and their children as they await permanent housing) were provided to adults and children.

**Other Populations requiring services or housing assistance to prevent homelessness; and other populations at greatest risk of housing instability:**

HUD defines persons *at greatest risk of housing instability* as households that (1) have an annual income at or below 30% AMI *and* (2) are experiencing severe cost burden; OR (1) have an income at or below 50% AMI *and* (2) meet certain conditions, like living in someone else's home or living in a hotel due to an economic hardship. Persons at risk of housing instability are often low-income, earning less than 30% - 50% AMI and experiencing cost burden or severe cost burden. According to HUD's 2013 - 2017 Comprehensive Housing Affordability Strategy (CHAS) survey of 140,455 households (see table 11 below):

- The City of St. Louis has 37,379 cost burdened households, representing 48.1% of all tenant households in the City;
- 32,482 (86.9%) of the 37,379 cost burdened households earn less than 50% area median income (AMI);
- Of the 41,681 tenants earning less than 50% AMI, 32,482 (77.9%) are cost burdened.

These figures reinforce what we know – that having a sufficient supply of affordable housing is essential to ensuring housing stability throughout the City. This segment of renters is likely living on the financial edge and may be at risk for a housing crisis event at any given time.

**Table 11****Renter Household Cost Burden by Income Bracket**

Income Bracket	# of Renter Households	# of Cost Burdened Rental Households	% of Renter Households Cost Burdened
<30% AMI (extremely low)	27,964	22,183	79.3%
30% to 50% AMI (very low)	13,687	10,299	75.2%
51% to 80% AMI (low to mod)	15,409	4,242	27.5%
80% to 100% AMI	5,997	460	7.7%
>100% AMI	14,573	194	1.3%
<b>Total</b>	<b>77,630</b>	<b>37,379</b>	<b>48.1%</b>

Source: Table 1 2013-2017 CHAS data, adjusted for estimated decline in total households in the city

In the City of St. Louis, there has been an increase in the number of individuals who have died due to opioids and stimulants. The Missouri Institute of Mental Health (MIMH) found in the City of St. Louis, the highest proportional increases for people who use opioids and stimulants combined were most evident among White males (+65%) followed by Black American males (+44%). In 2021, Black American males in St. Louis City had the highest rates. For people who use stimulants, in St. Louis City, the total number of stimulant-involved deaths across all groups decreased by 30% in 2021 compared to 2020. The largest proportional decreases were most evident among Black American females (-50%), followed by White males (-41%). From 2017-2021, Black American males in St. Louis City had the highest rates of stimulant-involved deaths followed by St. Louis City White males.

**Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:**

The City of St. Louis funds year-round shelters through various funding sources. The year-round shelters are predominantly contracted partnerships to have up to a total of 445 shelter beds. COVID-19 pandemic has caused a reduction of beds in some locations to require an expansion of beds to compensate in other locations. The City of St. Louis has funded in the past year about 350 emergency shelter beds to support increased need of access to shelter to the impact of COVID-19. See Exhibit B below.

The City of St. Louis currently owns two shelter locations. Biddle House, a congregate shelter located in downtown St. Louis with bed capacity of up to 100 men and approximately 50 beds additional for overflow during extreme temperatures. Biddle House provides daily assessment, client support, connections to resources, referrals, and housing placements. The City has also invested in tiny homes for unhoused individuals through the Jefferson Spaces initiative, which is a collection of 50 tiny homes also providing transitional housing with a goal of helping participants secure permanent housing on average within 6 months. Jefferson Spaces was created using COVID-19 CARES Act funding. This program provides safe shelter, counseling, showers, and daily meals. Outside of these resources, the City of St. Louis does not own any other housing development or units dedicated exclusively to unhoused individuals or families.

According to the **Housing Taskforce Update**, current housing funding resources to assist tornado victims are as follows: FEMA, \$23,566,030; CDBG, 4,200,000; ARPA, \$15,220,000; PRO Housing, \$3,250,000; RAMS Fund, \$10,000,000, and CDBG-DR, \$5,000,000.

For affordable housing development, the City-administered affordable housing investments from 2015-2019 averaged \$8.4 million per year; however, only 2% of all affordable housing resources came from local revenue (the Affordable Housing Trust Fund and Building Division’s Lead Remediation Fund). Another 9% came from federal grant sources administered by city and state agencies, while 82% came from state and federal Low Income Housing Tax Credit (LIHTC) generated investor equity. The administration of affordable housing resources is scattered among a number of both city and state agencies, resulting in a highly complex funding landscape. Table 17 summarizes information about units financed in the city from 2015-2019.



To assist individuals and families at risk of homelessness, the Missouri Housing Development Commission (MHDC) has allocated more than \$155 million of Emergency Rental Assistance funding to approximately 40,000 renters in St. Louis County via its State Assistance for Housing Relief (SAFHR) program. This funding is not permanent; and according to a Missouri Independent article published in December of 2022, the remaining \$150 Million to be used across the state will last only until April at its current usage rate. MHDC also provided St. Louis renters with almost \$21.3 Million of Emergency Rental Assistance Program (ERAP) funds as of April 2022. The ERAP program was funded by the

MHDC via CARES Act Emergency Solutions Grant (ESGCV) funding. However, MHDC has provided guidance that applications for rental assistance will no longer be accepted after January 31st, 2023. This will likely precipitate a spike in evictions, making the need for affordable housing in the City all the more pressing.

## **Describe the unmet housing and service needs of qualifying populations; and identify the priority needs for all four of the qualifying populations:**

### **Unmet Housing and Service Needs of the Homeless**

As of June 14, 2022, there are 772 homeless households on the prioritization list waiting to become housed. Due to limited resources the CoC is not able to assist all of the clients through supportive housing services. More than 560 households are homeless and living in emergency shelters, transitional housing, and other temporary housing situations. Half of the households on the housing prioritization list have been homeless for at least 255 days, due largely in part to the lack of availability for affordable housing. These individuals' and families' greatest need is permanent housing for their health, wellness, and long-term stability.

Since the May 2025 Tornado, the greatest recovery need has become rental assistance. The **Tornado Housing Recovery Update** indicated an urgent funding need of \$168.8M for tornado recovery. The Rental assistance need was identified as \$34.2 million. Due to the urgency at hand, "*at-risk*" **homeless tornado victims**" are now added as a preference population.

### **Unmet Housing and Service Needs of Persons at Risk of Homelessness**

Since March 15 of 2020, there have been more than 10,000 evictions filed in the City of St. Louis, according to Eviction Lab. These individuals and families are often on the brink of

homelessness; and even when they win their case, the eviction remains on their record and can prevent future landlords from accepting their application(s) for housing.

The table below shares exits without income and the stark data demonstrates the need for permanent supportive housing and other permanent housing for site-based and tenant-based, as successful exits were tied to these locations. This table shows that scattered site permanent supportive housing (what it calls tenant based – supportive services attached to tenants in scattered sites) seems to be associated with a higher rate of successful exits and aligns with other data showing that scattered site permanent supportive housing is best for families, though larger PSH developments may be best for individuals struggling with substance abuse or disabilities. Like the unhoused, the greatest need for this qualifying population is permanent housing for their health, wellness, and long-term stability. See Exhibit C below for further data on these populations and the City's efforts:

Site- vs. Tenant-Based Permanent Housing (2022)

*Data Source: Institute for Community Alliances*

	Site-Based PSH & OPH	Tenant-Based PSH & OPH	Tenant-Based RRH
<b>Exits without Income</b> <small>(adults only)</small>	<b>154</b>	<b>457</b>	<b>973</b>
<b>Percent of exits</b> <small>(excluding deceased)</small>	<b>51%</b>	<b>54%</b>	<b>42%</b>
<b>Negative exits</b>	<b>46</b>	<b>66</b>	<b>118</b>
Homeless situation (ES/TH/SH/streets)	11	9	49
Couch surfing (family/friends)	19	25	25
Unknown destinations (refused, no exit interview)	2	12	28
Institution (psychiatric hosp., substance use tx., incarceration)	10	16	3
Other temporary situation (hotel/motel, halfway house)	4	4	13
<b>Successful exits</b>	<b>107</b>	<b>379</b>	<b>850</b>
Permanent housing, no subsidy	28	127	563
Permanent housing, permanent subsidy	49	129	192
Permanent housing, temporary subsidy	4	8	72
Permanent housing, shared occupancy (family/friends)	26	115	23
<b>Excluded exits</b> <small>(hospitalization/long-term care)</small>	<b>1</b>	<b>12</b>	<b>5</b>

As stated before, the 2025 **Tornado Housing Recovery Update** indicated an urgent funding need of \$168.8M for tornado recovery. The Rental assistance need was identified as \$34.2 million. Due to the urgency at hand, *“at-risk” homeless tornado victims*” is also added as a preference population.

**Unmet Housing and Service Needs of Persons Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice**

Since the start of the COVID-19 pandemic, domestic and dating violence, along with sexual assault, stalking, or human trafficking, have increased across the country (New England Journal of Medicine, 2020). St. Louis is no exception to this trend. In its most recent point-in-time count, the City of St. Louis recorded 78 individuals who identified as survivors of domestic violence in its most recent PIT count. There were 75 individuals sheltered and 3 individuals unsheltered.

In the lens of housing, research by Matthew Desmond and Carl Gershenson (link: [https://scholar.harvard.edu/files/mdesmond/files/desmondgershenson.ssr\\_2016.pdf](https://scholar.harvard.edu/files/mdesmond/files/desmondgershenson.ssr_2016.pdf) ) has shown domestic violence survivors and their children are at particularly high risk for eviction. Survivors of DV often choose between stable housing and removing themselves from violence, leaving them without shelter. This qualifying population’s greatest need is to find secure, confidential temporary housing in conjunction with transitional support services.

It is also important to emphasize the level of discretion and care required in providing housing for individuals who are fleeing and attempting to flee these domestic situations. The burden and stigma of moving can exacerbate an inherently traumatic experience. The

City of St. Louis is fortunate to have multiple DV providers who provide security and support for survivors planning their next steps. These providers, including the CoC, and TWSH were consulted as part of this plan. The City will continue to support persons fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking by coordinating and collaborating resources with stakeholders. For example, the YWCA of Metro St. Louis serves as a drop-in center for people experiencing domestic violence. The YWCA also provides rapid re-housing for homeless women and families seeking safety from domestic violence, sexual assault, or stalking. Over 10,500 women and families are served annually.

It is important to note, however, that the YWCA Metro St. Louis Women's Crisis Services recently lost Continuum of Care contract funding for two critical projects related to permanent supportive housing (PSH) and rapid rehousing (RRH), respectively. The YWCA serves more than 1,000 individuals annually at no cost and is the largest provider of sexual and domestic violence services in St. Louis. They are the only dual services agency (serving victims of sexual and domestic violence) in the St. Louis region and are currently the largest provider of RRH for survivors of sexual and domestic violence in the city.

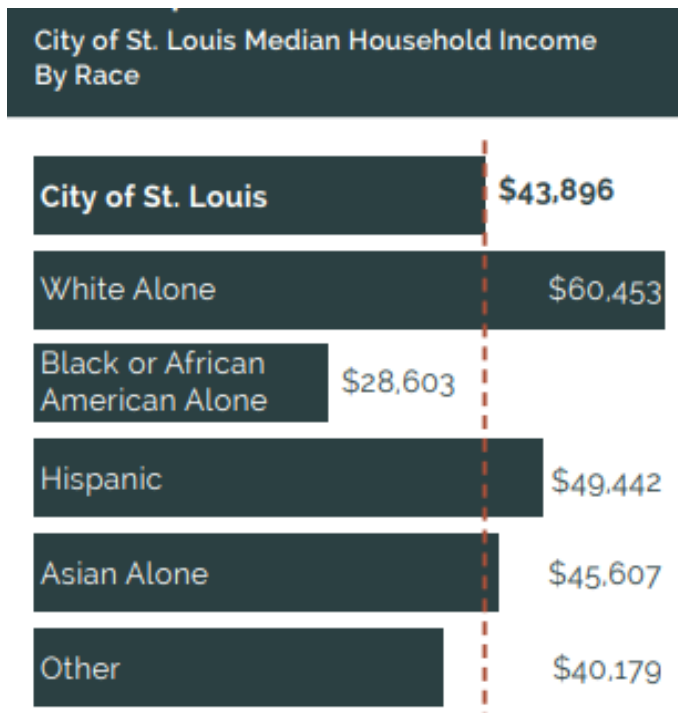
This kind of funding loss is especially critical in an area where resources are limited and demand remains high. In 2021, MOCADSV reported that 8,260 individuals received domestic violence services in the St. Louis area, but 5,479 requests were unmet because agencies lacked the resources.

## **Unmet Housing and Service Needs of Other Populations Requiring Services or Housing Assistance to Prevent Homelessness; and Other Populations at Greatest Risk of Housing Instability**

The data provided by ICA demonstrates there is a gap in services to meet the needs of these other populations. Data from 2022 reports 382 of 772 (49.5%) St. Louis households disclosed mental health disorders. For substance use disorders, 227 of 772 (29.4%) households in the City of St. Louis had a current or past substance use disorder which may be a barrier to obtaining or maintaining stable housing. ICA shared site-based permanent housing with on-site supports, including mental health treatment, has proven to be an effective tool in supporting individuals and households with mental health disorders to address housing instability.

The City of St. Louis also conducts Weekly Housing & Match Meetings (WHAMM) to ensure that individuals with the most severe needs are connected to shelter and/or housing. COC members comprised mostly of street outreach, housing providers, Coordinated Entry System (CES) and HMIS Lead agency staff meet at WHAMM weekly to case conference persons in the Priority Pool and other cases as needed to prevent exits to non-permanent destinations. These reports help the COC to see progress monthly and are instrumental in helping the COC monitor data such as exits to permanent housing. The COC's CES utilizes WHAMM to facilitate lateral moves/transfers to help assist with maintaining permanent housing and exits to permanent housing destinations. This helps stabilize the QP and prevent their repeated entry into the homeless population.

## Identify gaps in Current Shelter and Housing Inventory, Service Delivery System:



There are currently no safe haven shelters available in the City of St. Louis. Safe haven programs are critical to serve hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services. Members of the CoC and consultations with local service providers spoke about clients who

needed additional assistance but had previous bad experiences with shelters and service providers, creating a distrust of these organizations. Safe haven programs are created to address this and tailor plans to individual needs.

In addition to HOME-ARP consultations, the City's Affordable Housing Study, Report & Strategy provides a guiding framework to align programs and policies that will address intersecting housing challenges, including homelessness and affordability. It includes a detailed analysis of CHAS, Public-Use Microdata Samples, and other housing and census data to assess gaps in the City's housing inventory. The study shows a massive gap in the current housing inventory. In the City of St. Louis, this shortage of affordable rental units greatly limits how quickly an individual can move through the Continuum of Housing.

Of the approximate 144,295 households in the City of St. Louis, 77,630 of these are renters; and nearly half of these renting households (37,379) are cost-burdened, with the vast majority spending close to 50% of their household income on housing. This is connected to the lack of affordable housing in the City. A homeless service provider spoke to this in their consultation, stating that because an estimated 30% of households in the City of St. Louis cannot afford rent over \$625/month, the City is in desperate need of housing that is *actually* affordable for households below the area median income (AMI).

The gap in the City's current inventories and services is largely represented by households earning at or below 50% of the HUD Area Median Family Income; and by households that are disproportionately Black Americans. The City's supply shortage of rental units for extremely low and very low-income individuals results in a crushing demand for affordable housing. Further, this demand is reflected in the more than 30,000 households on the Housing Authority's waitlist for Housing Choice Vouchers and public housing units.

From consultation with the Housing Authority to fair housing organization EHOc to area service providers serving all four Qualifying Populations, CDA has learned that the supply shortage also exacerbates existing challenges for households with Section 8 vouchers, which may only be used to cover rents under 120% of Fair Market Rent to secure housing (St. Louis Housing Authority has a waiver). The City of St. Louis FY22 FMR was \$745 for a one bedroom unit, which places individuals with Housing Choice Vouchers in direct competition with individuals in the housing market making less than 50% AMI.

St. Louis Housing Choice Vouchers (HCVs) and Public Housing Units (PHs)			
Number of HCVs	HCV Unit Wait list	Number of PH Units	PH Unit Wait list
6,379 <sup>2</sup>	19,736	2,790	10,906

These thousands of rent-burdened individuals are just a health emergency or lay off away from falling into homelessness. Further, a lack of housing at fair market rents presents an obstacle to effective use of housing choice vouchers, which represent one of the most impactful tools the city has to provide unhoused residents with long term support. As a result, one of the key recommendations from the report is to invest in the production and preservation of affordable, quality housing to bolster the City’s housing stock.

Additionally, the report recommends that such investments be focused, asset based, inclusive, resilient, and driven by neighborhood planning.

## HOME-ARP Activities

Eligible activities that may be funded with HOME-ARP include:

- Development and support of affordable housing;
- Tenant-based rental assistance (TBRA);
- Supportive services (e.g., housing counseling, homelessness prevention, childcare, job training, legal services, case management, moving costs, rental applications, rental assistance); and
- Acquisition and development of non-congregate shelter units

### **Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:**

After the submission and approval of The City of St. Louis' HOME-ARP Allocation Plan, the City will issue a NOFA on *February 2024 and commit funds to projects pursuant to and* under a competitive selection process. Applicants may include developers, not-for-profit agencies with proven capacity to administer such programs. Qualified populations of the 2025 Home-ARP rental assistance services will be prioritized on a first come, first served basis and referred through the **ARCH by Homescreen APP**. This third-party vendor, receives the application, selects and refers eligible applicants to participating landlords. Organizations and services who receive funding will provide monthly reporting of their activity and submit request for reimbursement based on the completed activity for the month.

Funds which are not committed through the 2024 NOFA may be committed either through future NOFAS, or, in the case of a public emergency which does not permit the delay associated with a competitive selection process, through subrecipient agreements with partners selected by CDA due to their unique ability to respond to urgent needs.

CDA plans to directly administer its HOME-ARP programs for the City to expand the supply of quality, affordable housing and to stabilize neighborhoods via remediation of blighted areas. CDA will administer applications from developers, service providers, subrecipients and/or contractors to carry out these programs; and will ensure that 70% of all HOME-ARP funded units will only admit HOME-ARP eligible individuals and households. The chart below breaks down the planned use of HOME-ARP funding between supportive services, rental assistance, development of affordable rental housing units, and administration/planning costs, totaling \$10.6M.

Planned Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 2,000,000	18.8%	
Acquisition and Development of Non-Congregate Shelters	\$ 0.00	0%	
Rental Assistance	\$ 2,000,000	54%	
Development of Affordable Rental Housing Units	\$ 5,668,657.27	18.7%	
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$966,865.73	9.1%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$ 10,635,523.00</b>		

**Describe how the City will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:**

One of the major gaps in the City's housing inventory is access to permanent supportive housing. People experiencing homelessness or at risk of homelessness, fleeing domestic violence, or facing other qualifying challenges continue to be the most vulnerable in having available low-barrier shelter options. The City will distribute HOME-ARP funds to

meet this priority need and expand the supply of ~~develop~~ permanent supportive housing accessible to all four qualifying populations, as defined by HUD. CDA may expand this supply by either subsidizing the development and rehabilitation of permanent supportive housing, and/or by funding the provision of HOME-ARP eligible supportive services to members of qualifying populations, as defined by HUD.

-

**Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:**

The assessment and feedback process identified two primary themes, the need for quality affordable housing and the need for supportive services for people unhoused or at-risk of becoming unhoused to help them become and/or remain permanently housed. The City therefore decided to focus HOME-ARP funding in these two areas as opposed to Non-Profit Operating and Capacity Building or Non-Congregate shelters. The City is committed to moving people out of the cycle of temporary housing and into permanent, supportive housing by developing more affordable units, helping people initially pay for those units, and providing supportive services to tenants and clients to ensure they are able to become and remain permanently housed.

## HOME-ARP Production Housing Goals

### **Estimate the number of affordable rental housing units for qualifying populations to be produced or supported with HOME-ARP funding:**

The total number of units produced with these funds will hinge on a variety of factors, including housing type, construction cost, and leverage. Development of these units will occur on land currently owned by the City of St. Louis or Land Reutilization Authority. Utilizing land already within the city's control will reduce site acquisition costs and ensure that proper environmental review standards are maintained.

**Housing Type:** The City of St. Louis is committed to producing affordable housing as diverse as our city, ranging from permanent supportive housing to affordable rental housing; from scattered site residential infill to large mixed income, mixed use developments; from tiny homes to manufactured housing; from senior housing to women's safe houses. For the purposes of this unit production estimate, and based on the City's engagement and gaps analysis, we will assume that the City chooses to fund three projects with these funds: a single site permanent supportive housing development; a scattered site permanent supportive housing development; and a tiny home permanent supportive housing development. We have excellent financial and planning models for each of these projects: Doorways 2.0, which includes 39 units of permanent supportive housing budgeted at roughly \$10M; Marquette Homes, which includes 60 units of scattered-site affordable rental housing, budgeted at roughly \$16.5M; and the Veterans Community Project, which includes 50 tiny homes and a community center, budgeted at roughly \$10M.

**Construction Costs:** In the past year, the City of St. Louis has reviewed a wide range of affordable rental and permanent supportive housing projects. While labor and supply

chain shortages have driven a significant increase in construction costs over the past year, the City anticipates – and is beginning to observe – inflation in the construction market slowing. For the purposes of this unit production estimate, we will assume an approximate 20% increase in total development costs above the comparable projects listed above.

**Leverage:** We anticipate leveraging HOME-ARP funds with Low Income Housing Tax Credits and various other federal, state, and local tax credits and funding sources. We do not anticipate HOME-ARP funds will represent more than 50% of any given project’s capital stack and would prefer to keep it between 10 and 40%. For the purposes of this unit production estimate, the City assumes HOME-ARP funds will fund roughly 25% of Total Development Costs. CD partners on these projects are MHDC and various developers. LIHTC is typically 50% and the other 50% is MOU funds that CDA and MHDC have for expedited joint compliance review of project.

**Unit Production Estimate:** Provided that we can secure substantial leverage, we hope to produce 50-100 units. While projects funded will depend on responses to the Permanent Supportive Housing NOFA, sample projects could include: i) 20 units of Multifamily Permanent Supportive Housing (~\$1.5M HOME-ARP award; ~\$6M Total Development Cost); ii) 35 units of scattered site permanent supportive housing (~\$3M HOME-ARP award; ~\$12M Total Development Cost); and iii) 25 units of tiny home permanent supportive housing (~\$1.5M HOME-ARP award; ~\$6M Total Development Cost)

**Describe the specific affordable rental housing production goal the City hopes to achieve and describe how the production goal will address priority needs:**

HOME-ARP funds will be used to fund the construction of new housing units, and to provide supportive services and rental assistance to ensure that housing built is not just affordable, but permanent and supportive. The total number of units will depend on the degree of leverage included in applications and may include both new construction projects and rehabilitation projects (of vacant, not inhabited buildings). The City intends to construct a minimum of 50-100 individual units to assist qualifying populations. These projects will use master leases which we will allow us to make the units available to QPs

Determining Housing Production Goals for the HOME-ARP Allocation Plan Housing Production Goal Calculation Worksheet and FAQ		
<b>HOME-ARP Housing Production Goal Calculation Worksheet</b>		
<p>PJs may use this worksheet to estimate the number of affordable rental housing units for qualifying populations that a PJ will produce or support with its HOME-ARP allocation. The allocation plan must also include a narrative about the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs.</p> <p>To estimate the number of HOME-ARP units that will be created with HOME-ARP PJs should enter the required data in the green cells in column C of the worksheet. Using these numbers, formulas in the blue cells will calculate the number of units that can be produced.</p> <p><b>NOTE: This worksheet provides two columns to calculate the number of HOME-ARP units that will be created if a PJ will create two rental housing projects.</b> To calculate any additional HOME-ARP units that will be created for <b>more than two</b> rental housing project, the cells in columns C can be copied over for additional calculations. Select cells 6C through cells 27C. Use the mouse to right click and select "copy". Next, select the cell you want to copy the formulas into. Right click the mouse and select "paste." You will then be able to enter data into the green cells to calculate additional units.</p>		
	<b>HOME-ARP Rental Housing Production Estimate</b>	<b>Notes</b>
<b>Housing characteristics required by the qualifying populations</b>		
Qualifying populations targeted for HOME-ARP rental housing (average household size)		Families
Average household size		3
Unit size needed (number of bedrooms)		2
Amenities		Supportive services office
<b>HOME-ARP Funding</b>		
Total amount of HOME-ARP funding allocated to jurisdiction	\$ 10,635,523.00	
Amount of HOME-ARP expected to be used for admin, NFP operating and capacity building	\$ 966,865.73	
<b>Amount of HOME-ARP available for HOME-ARP eligible activities</b>	<b>\$ 9,668,657.27</b>	
Amount of HOME-ARP allocated to non-rental housing eligible activities	\$ 4,000,000.00	
<b>Amount of HOME-ARP available for rental housing operations and reserves</b>	<b>\$ 5,668,657.27</b>	
Estimated amount for ongoing operating costs or operating cost assistance reserve	\$ 566,865.73	Communities can estimate this amount as a percentage of the available HOME-ARP resources (in this example it is 20% of the available HOME-ARP resources) or as a fixed amount per unit per year.
<b>Amount of HOME-ARP available for rental housing development</b>	<b>\$ 5,101,791.54</b>	
Estimated amount from other housing development funding sources	\$ 15,305,374.63	*Explain CDA rental housing projects historically leveraged 90+%
Total amount available for rental housing development	\$ 20,407,166.17	
Average per unit development cost for qualifying population	\$300,000	PJs should consider the unit size and amenities needed for the qualifying populations being served in the project when estimating the per unit development cost. - Explain Tiny Homes will cost less, new multifamily construction will cost more, scattered site rehab will cost even more.
<b>Estimated HOME-ARP Housing Production Goal</b>	<b>68</b>	
<b>Narrative: Use the area below to document the assumptions used in this worksheet. This will assist with the development of the required narrative in the allocation plan.</b>		

# Preferences

**Identify whether the City intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:**

- Generally, the City will support projects that prioritize the most vulnerable individuals and families, who often require assistance transitioning to housing, case management, legal services, and/or other short and long-term supportive services. To help identify those most in need and facilitate more rapid access to services and support for those urgently at risk of remaining or becoming homeless, the City will give preference to agencies and organizations that utilize the St. Louis Continuum of Care (CoC) Intake system, 211, or accept direct referrals to assess need. CoC and 211 do not give preference to or exclude any HOME-ARP Qualifying Population from the intake process. However, the City may prioritize funding for supportive services with emphasis on providing rental assistance to individuals and families who fall within the “Homeless” or “At-Risk” of Homelessness HOME-ARP Qualifying Population as tornado victims on the utilized intake assessment.

Prioritization “first come, first served basis” for tornado victims only. The referral method is by a third-party vendor using ARCH by HomeScreen APP.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

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At the time of our initial analysis in June 2022, the CoC had 772 households on their prioritization housing list, half of those having been homeless for over 250 days. We also heard from local housing organizations and members of the CoC during our June 2022 public hearing an expressed need for specialized supportive services, especially for those populations in need of housing. The CoC does not currently have the resources to meet the housing and supportive services needs of all these individuals. Focusing HOME-ARP funds for housing and services for Homeless populations and those urgently At-Risk of Homelessness will allow the City to more rapidly address this unmet need. Since the May 16<sup>th</sup> tornado, a preference for over 5,000 tornado victims in the "Homeless" and "At-Risk" Homeless category has been established. Preference given to individuals and families in QP, "homeless" and "at-risk homeless" in particular; and using the referral method of the "ARCH by HomeScreen APP would streamline the process for the tornado victims.

**Describe how the City will still address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in a preference through the use of HOME-ARP funds:**

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Available HOME-ARP funds are not sufficient to meet all the unmet needs in housing and services for qualifying populations in the City. In partnership with the CoC and other agencies (e.g. City Department of Health, Department of Public Safety, and Affordable Housing Commission) and nonprofits (e.g. YWCA, Legal Services of Eastern Missouri) supporting members of HOME-ARP Qualifying Populations, the City will coordinate housing and supportive services for those not served by HOME-ARP funds. The City also commits other funding sources, including Emergency Shelter Grants through the City Department of Human Services, to support activities to meet these unmet needs.

## HOME-ARP Refinancing Guidelines

If the City intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the City must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#):

***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity:***

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

*Other requirements in the PJ's guidelines, if applicable.*

Not Applicable. The City of St. Louis does not currently intend to use HOME-ARP funds to refinance existing debt by multifamily rental housing that is being rehabilitated with HOME-ARP funds.