

NAPA COUNTY
RESPONSE TO THE GRAND JURY FINAL REPORT ON
HOMELESSNESS: MUCH IS BEING DONE—MORE IS REQUIRED
June 14, 2022

Findings:

Finding 1: There are several City and County officials providing leadership toward the goal of reducing homelessness, but a lack of unified integration of the various stakeholders.

The Director of Housing & Homeless Services partially disagrees with the finding. The Director agrees there are many County and City officials providing positive leadership toward the goal of reducing homelessness and disagrees there is a lack of unified integration among key stakeholders in the community.

The Continuum of Care (CoC) is the local planning process and entity used by communities to apply for funding from the Federal Department of Housing and Urban Development (HUD) and many State funding entities. The CoC process was developed by HUD in 1994 to coordinate the distribution of competitive and non-competitive Federal funding for programs assisting individuals and families experiencing homelessness. Prior to the CoC process, organizations within a single community applied individually for funding from an array of funding programs at the Federal level. As a result, there was little coordination between programs, or applicant organizations receiving funding in the same community. The CoC process was established to ensure coordination within communities and between programs. In 2009, President Obama signed the HEARTH Act (Public Law 111-22), providing Congressional authorization of the CoC process and regulations governing the CoC program were published in the summer of 2012.

The CoC Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse individuals and families experiencing homelessness while minimizing the trauma and dislocation caused to those individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs and optimize self-sufficiency among individuals and families experiencing homelessness. The geography covered by a CoC can vary, depending on population size and proximity. The local CoC, Napa City & County Continuum of Care 517, includes all jurisdictions and territories within the geographic boundary of Napa County.

The CoC planning process is organized by a delegate Administrative Entity, typically either a local government agency or a community-based non-profit. For the Napa City-County CoC, Napa County Housing & Homeless Services is the designated Administrative Entity. The goal of the CoC process is to create and continually refine a 10-year plan to end homelessness. The process involves regular collection and reporting of information about homelessness in the community, including bi-annual Point-In-Time (PIT) counts, and information about resources to assist individuals and families experiencing or at-risk-of experiencing homelessness. This information is used to develop a list of priorities for funding, which help determine how much funding a community will receive and for what projects.

The Napa CoC initiated an in-depth planning process from January to June 2022 to update the existing ten-year plan. This planning process was led by a 14-member Steering Committee made up of individuals from a diverse group of organizations representing and serving individuals experiencing homelessness. The resulting 2022 Strategic Plan to Address Homelessness (attached) was formally adopted in June 2022. This plan provides the homeless system of care and the greater Napa community with a shared context of how people are experiencing homelessness, details strengths and gaps in the existing system of care and recommends goals and strategies to improve programs at all levels of system response. It is meant to address the needs of the entire County (including all jurisdictions within the County) and reflects input from a vast array of sectors and responders across the community, including

direct service providers, public sector staff, business leaders and individuals with lived experience of homelessness.

In addition to the coordinated, integrated, and unified work of the CoC partners, staff at both the County and City of Napa work closely and collaboratively on both day-to-day operations and long-term planning issues. The City and County have had a Cooperative Joint-Powers-Agreement in place since 2017. This Agreement clearly defines each entity's role and responsibility in the funding and provision of services to reduce homelessness, including Outreach, Emergency Shelter and Housing Programs.

Finding 2: There is a lack of case management to ensure that all homeless persons are directed to the proper social services and health care.

The Director of Housing & Homeless Services agrees available outreach and shelter case managers are not currently able to provide comprehensive case management services to ensure every person experiencing homelessness is connected to proper social services and health care. The Director further notes innovations in Medi-Cal service delivery under a new population health approach to care focused on prevention and whole person care known as California Advancing and Innovating Medi-Cal (CalAIM) seeks to address this finding. CalAIM will make sustained investments and commitments to provide Enhanced Care Management (ECM) through in-person engagement where beneficiaries live, seek care and access services in order to connect them to available social and medical support services.

Finding 3: The Grand Jury found it difficult to determine how much money County departments spend on addressing homelessness issues. County budgets/spending information do not attribute expenditures to that level of detail.

The Director of Housing & Homeless Services partially disagrees with the finding. In 2019, the County of Napa established the Division of Housing & Homeless Services, merging Homeless Programs (formerly a sub-division of Health & Human Services Operations Department) with County Affordable Housing (Fund 2080) and Housing Authority (Fund 5060) budget units within the County Executive Office. In 2021, Housing & Homeless Programs was established as a separate and distinct Fund (Fund 2030) within the County budget to clearly and transparently track the money the Division of Housing & Homeless Services spends annually providing programs and services for individuals and families experiencing homelessness. This budget unit includes all revenues from grants and contracts for the provision of services, as well as all expenses incurred via contracts, direct expenditures as well as salaries and benefits for administrative staff.

The Division of Housing & Homeless Services, and sub-division of Housing & Homeless Programs, is the primary County department and budget unit (Fund 2030) for services responding to homelessness provided by the County. There are, however, many other Divisions and Departments within the County that also provide services or incur costs related to homelessness response, including multiple Departments in the Health & Human Services Agency (Self-Sufficiency, Public Health, Mental Health, Alcohol & Drug, and Comprehensive Services for Older Adults), as well as the Sheriff's Office, Public Works, and Corrections, among others. In other words, the Fund 2030 budget is detailed and comprehensive for Housing & Homeless Programs but is not an exhaustive compilation of all County expenditures attributable to homelessness response. Given the nature and complexity of other departments funding and reporting requirements, it would be difficult if not impossible to identify all

expenses attributable to homelessness response in budget units outside of Fund 2030.

Finding 4: The current data collection systems used do not provide sufficient analytical data for examining the use of social services. Current data are not being used by administrative support staff to analyze trends specific to demographic groups and to develop enhanced utilization of local services.

The Director of Housing & Homeless Services agree with the finding.

Finding 5: There is a lack of social services available for homeless persons in general, especially those with physical, mental health or addiction disabilities.

The Director of Housing & Homeless Services agrees with the finding. The 2022 Annual Point-In-Time (PIT) Count showed 494 individuals experiencing homelessness on the morning of the count. Over the course of the calendar year 2021, 759 unique individuals were served by the homeless system of care in shelter and housing projects. The shelter system is designed to leverage all available resources to best serve the spectrum of needs of all individuals experiencing homelessness, and social services are a core part of the service model. Nonetheless, the scale of need relative to the scale of resources available results in a service shortage.

Finding 6: HHS Crisis Stabilization Unit (CSU) lacks sufficient bed capacity to manage increasing number of crisis cases which limits services for homeless people in crisis.

The Director of Housing & Homeless Services agrees with the finding that demand for Crisis Stabilization beds periodically exceeds the number of beds available, which in turn limits access for individuals experiencing homelessness who are experiencing an acute mental health crisis and need stabilization services during those times.

To the extent the Finding is related to a program operated under an entirely different County department, Health and Human Services Agency (HHSA), the Director of Housing & Homeless Services has consulted with the Director of Health and Human Services, and both agree that further understanding of the existing program would be helpful. While a response was not requested from the Director of HHSA, the Director supplements this response by noting that HHSA, through its Mental Health Division, provides a full continuum of crisis management services including through mental health clinicians embedded with law enforcement staff, mental health clinicians who comprise our Mobile Response Team who provide community-based field response, our Crisis Stabilization Program operated by our contractor Crestwood Behavioral Ince, our Crisis Residential services provided through our contractor Progress Foundation, and HHSA also provides for and manages significant numbers of psychiatric hospital placements and Institutions for Mental Diseases (IMDs) placements. It is hoped that this overview of HHSA's services helps provide a more comprehensive response.

Finding 7 – There is available land which could be used for the development of housing for homeless. Several interviewees stated that suitable land may be available on the Napa State Hospital property, the Veterans Home in Yountville, church properties, and closed school sites (e.g., Harvest Middle School, Yountville Elementary and Stonebridge/Carneros.¹⁹) Unfortunately, there is not evidence of progress

towards finalizing such new locations.¹⁹ To attempt to address the shortage of available property for the development of emergency shelters and affordable housing, Governor Gavin Newsom issued Executive order N6-10 directing the Department of General Services (DGS) and the Department of Housing and Community Development (HCD) to identify and prioritize excess state-owned property and aggressively pursue sustainable, innovative, cost-effective housing projects. The Napa County sites identified were lower Skyline Wilderness Park; Caltrans properties near Imola Avenue, Redwood Road, and Stanley Lane; Highway 29 at Green Island Road in American Canyon; and along Highway 29 near Yountville. Napa State Hospital has also been considered as possible land for affordable housing development. County housing officials have approached Napa State Hospital administrators to discuss land usage but have been informed that the hospital is currently developing a Master Plan for future hospital land usage including the consideration of workforce housing for their own employees who have to commute long distances. Other sites mentioned as possibilities for housing projects are the Yountville Veterans Home, closed school sites, churches, and the Jail Reentry facility.

The Director of Housing & Homeless Services partially disagrees with the finding. The County of Napa is actively engaged in discussions with local, State and Federal agency counterparts regarding using the available surplus land for the possible development of supportive housing.

Finding 8: Some potential affordable or temporary housing projects have not been approved due to community resistance or NIMBYism. Both the Heritage House and Valle Verde housing projects initially met with community resistance.

The Director of Housing & Homeless Services partially disagrees with the finding.

The Heritage Housing and Valle Verde project was met with significant neighbor resistance. However, it also received significant community support and was ultimately approved. In the last year, the County and City of Napa have invested in two additional permanent supportive housing projects under Project Homekey (an 8-unit, 14-bed project known as “Adrian Court”, and a 54-unit, 54-bed project known as “Valley Lodge Apartments”), neither of which were met with any opposition of note. NIMBYism remains a mindset among some homeowners but has not proven to be an insurmountable obstacle.

Finding 9: Current unused space at Juvenile Hall could be converted to general housing for homeless youth, but only if authorized by the Court.

The Director of Housing & Homeless Services agrees with the finding that if authorized by the Court and any bond or other regulatory agencies with covenants on the property, Juvenile Hall could be repurposed to provide transitional housing for transition-aged youth experiencing homelessness.

Recommendations:

Recommendation 1: A leadership council should be formed by those government officials and stakeholders who control the most resources directed to the goal of supportive housing.

Response, Director, Napa County Housing and Homeless Services: The recommendation has been implemented. The Director of Housing & Homeless Services recognizes the HUD mandate establishing

the CoC as the local leadership council controlling the distribution of Federal and many State resources for programs assisting individuals and families experiencing homelessness. The Director values the vital role a single community planning entity plays in establishing and ensuring coordination between programs, applications, and uses of funding to address homelessness in the Napa community and further respects the work of the steering committee of homeless system leaders who led the considerable planning process to develop the 2022 Strategic Plan to Address Homelessness and the five goals it established:

1. **Expand access to permanent housing**, including permanent supportive housing, rapid rehousing, and other housing opportunities, for people experiencing or at risk of homelessness
2. **Prevent households from becoming homeless** for the first time, and rapidly rehouse newly homeless households.
3. **Expand access to and quality of services** for people experiencing homelessness in Napa County.
4. **Build upon cross-system partnerships and collaborations** to target and serve all people experiencing homelessness in Napa County.
5. **Ensure that Diversity, Equity, Inclusion, and Belonging are core considerations** in program development and that all members of the community have equal access to care.

The Director of Housing & Homeless Services therefore both agrees with the recommendation that resources be directed to supportive housing, one of five goals in the Strategic Plan, and respectfully disagrees with the recommendation to form a second leadership council separate from the CoC.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 2: The Continuum of Care should compile and inventory of services available to homeless persons to better inform clients and promote increased collaboration and effective delivery of services by providers.

Response, Director, Napa County Housing and Homeless Services: The recommendation has been implemented. The Director notes the recommended inventory of services is developed and has been available since 2021, both online and in hard copy.

Case management is one of the primary services offered to individuals and families experiencing homelessness. It is a service which typically involves assisting and supporting individuals with developing the skills to access needed medical, behavioral health, housing, educational, employment and other services to meet their basic needs. This includes providing orientation and connections to ongoing community resources, including at times the case manager being a point of contact between clients and their social and medical support system providers. It is a comprehensive and strategic form of service

provision designed to meet the individual's needs.

Due to limited available funding relative to the scope and scale of the population of individuals and families experiencing homelessness, the Director agrees with the finding that there is an overall deficit in the number of available case managers in the community (across all agencies serving individuals and families at-risk of or experiencing homelessness) compared to the number of individuals who could benefit from services. To address this gap and provide ways for individuals needing services to navigate to available services directly, Napa County Housing & Homeless Services compiled an inventory of services available to those experiencing homelessness in 2021. This information is available online at www.homelessnapa.com as well as via a trifold, full-color pamphlet printed and distributed to service providers and community resource providers (such as schools and libraries).

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 3: County officials need to develop a more detailed program budget which would make it easier to determine how much money is spent toward homelessness on an ongoing basis.

Response, Director, Napa County Housing and Homeless Services: The recommendation has been implemented. The Director believes the County has already met the recommendation to provide detailed program budget information for *most* County expenditures on homelessness response through Fund 2030 within the County budget, and still agrees with the finding that it is difficult to determine the full extent of all resources spent addressing homelessness issues because of the sheer number of organizations, jurisdictions and funding entities across the community involved.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 4: Homeless Management Information System data should be more easily accessible to all HMIS users from different City and County departments (while maintaining privacy requirements) to improve the efficiency and quality of service delivery.

Response, Director, Napa County Housing and Homeless Services: The recommendation has not yet been implemented but will be implemented in Fiscal Year 2022-2023.

The Director of Housing & Homeless Services and staff have identified expanded analysis and data-visualization to better track performance measures and outcomes as well as increase service partner and community member understanding of homeless system data as a top priority of Housing & Homeless Programs for Fiscal Year 2022-2023. To accomplish this goal, Housing & Homeless Services will expand a technical service contract with the existing Homeless Management Information System (HMIS) provider this year. Expanded services will include enhanced system administration, direct user support for all HMIS community partners, training and professional development for system users and services and support for retrieving and analyzing HMIS and Coordinated Entry System (CES) data.

Data is key to the Napa Continuum of Care's ability to make decisions and design homeless-response systems that advance meaningful change. It is crucial to establish a culture that values it, and an administrative infrastructure that delivers it from quality data entry through analysis and design and presentation of insightful reports. The technical skills and in-depth system and specialized knowledge necessary to support this culture and capacity are unique to the system and therefore difficult to hire and/or develop internally. Securing this technical assistance by contract is a top priority for the Division in the current Fiscal Year.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 5: The Napa County HHSA should hire additional Mental Health and Substance Abuse counselors to assist in crisis management and outreach efforts for the homeless. In addition, the County should increase the number of beds at The Crisis Stabilization Unit to ensure that crisis cases are not diverted to Queen of the Valley Medical Center.

Response, Director, Napa County Housing and Homeless Services: The recommendation to hire additional mental health counsellors to assist in homeless outreach efforts has not yet been implemented by the Housing & Homeless Services Division of the Acting County Executive's Office but will be implemented in Fiscal Year 2022-2023 as part of the Cooperative Joint Powers Agreement between the City and County of Napa for the provision of homeless services. To the extent this recommendation is actually directed to an entirely different County department, Health and Human Services Agency (HHSA), the Director of Housing & Homeless Services has consulted with the Director of Health and Human Services, and both agree that a further understanding of what programs already exist at HHSA would be helpful. While a response was not requested from the Director of HHSA, the Director supplements this response by noting that HHSA, through its Mental Health Division, runs an "Adult Full-Service Partnership (AFSP)" program. The program serves adults who have been diagnosed with a serious and persistent mental illness and homeless or at risk of homelessness. AFSP program provides comprehensive mental health services with intensive case management. Those enrolled in the AFSP program are provided with a case manager skilled in supporting them in the following activities: income, healthcare, employment, education, substance abuse treatment and overall stability in their lives. The program has a total of nine staff that includes a supervisor. HHSA continues to work diligently on recruitment and retention which is a significant issue throughout California and within the behavioral health field; currently, there are two vacancies in this unit. In terms of crisis management, HHSA, also through its Mental Health Division, provides a full continuum of crisis management services including through mental health clinicians embedded with law enforcement staff, mental health clinicians who comprise our Mobile Response Team who provide community-based field response, our Crisis Stabilization Program operated by our contractor Crestwood Behavioral Inc., our Crisis Residential services provided through our contractor Progress Foundation, and HHSA also provides for and manages significant numbers of psychiatric hospital placements and Institutions for Mental Diseases (IMDs) placements. It is hoped that this overview of HHSA's services helps to provide a more comprehensive response.

The recommendation to increase the number of beds at the Crisis Stabilization Services Program (CSSA, or "Crisis Stabilization Unit"), again, should be directed to the HHSA which, as explained above, is a different County department.

The Crisis Stabilization Services Program (CSSP) is not a program under the Division of Housing & Homeless Services (DHHS) but rather the Mental Health Division of the Health & Human Services Agency (HHSA). Although a response from the Director of HHSA was not requested, the Director is providing a response due to the likely misunderstanding of where this program resides in the County's organizational structure. The Director of HHSA notes that the recommendation has not yet been implemented, but efforts at HHSA are otherwise already underway to explore the feasibility of increasing the number of beds (chairs) at the facility itself. HHSA regularly examines utilization and other data in making evidence-based decisions about programs, both existing and new. This potential expansion requires more than simply adding more chairs and implicates the need for an infrastructure buildout of the physical space. That work requires infrastructure funding, which HHSA anticipates applying for a state grant. Infrastructure grant funding will, in turn, result in a capital improvement project and work needed by other County departments. HHSA has taken steps to position itself for being able to take advantage of such opportunity. Concurrently, HHSA is evaluating the increased operational costs that would come with an expansion of the CSSP as the clinical staffing ratios and overall programmatic costs also increase. That said, HHSA has been actively studying and exploring such an expansion for one year. With grant opportunities for facility infrastructure now available, this is an opportune moment that HHSA intends to take advantage of. The timeline for actual implementation is a function of grant funding timelines, construction feasibility and timelines, and ongoing funding sustainability. Due to the nature of applying for state grant funding, receiving notification of an award, and the related construction work, this is a multi-year initiative, and it is underway. Finally, not all referrals to the Crisis Stabilization Services Program are individuals experiencing homelessness. The program provides immediate response for periods of less than 24 hours to individuals of all ages who are experiencing an acute mental health crisis to stabilize the individual enough to return home or transition to other appropriate longer-term care facilities.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 6: The Napa County Public Health Division should form a task force, including personnel providing law enforcement, mental health, and emergency medical services, to treat people suffering from drug induced mental disorders, with special emphasis on crisis resulting from the use of P2P methamphetamine and Fentanyl.

Response, Director, Napa County Housing and Homeless Services: The Director of Housing & Homeless Services and Director of HHSA refer to the above response to Recommendation 5 and incorporate it by reference. The Directors also note that the CSSP does not fall within the purview of the Public Health Division of HHSA, but instead the Mental Health Division of HHSA. Additionally, it is worth noting the existence of the Napa Opioid Safety Coalition which includes a wide array of members, including HHSA's Public Health Division and Alcohol and Drug Services Division staff, as well as a wide range of healthcare and behavioral healthcare providers and organizations. Since this recommendation is broader than opioids, it requires further analysis and as a matter of purview would fall to HHSA, including its previously reference Alcohol and Drug Services Division, who already works closely with other providers, many of whom are direct contractors, in the provision of a full range of treatment and recovery services. Further, the Napa Continuum of Care adheres to a Housing First model of care, which takes the view that provision of subsidized housing should occur before substance abuse treatment can be effective.

Housing First programs provides housing without requirements to complete treatment or abstain from drug, though case management services are offered to clients. Housing retention for clients housed under Housing First is excellent with more than 85% of clients housed locally remaining in housing.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 7: Napa County Board of Supervisors and County Housing and Homeless Services departments should enact policies and procedures to facilitate the use of land for low income and permanent supportive housing (e.g., the Wine Valley Lodge).

Response, Director, Napa County Housing and Homeless Services: The recommendation has already been implemented.

The Director of Housing & Homeless Services agrees with the recommendation to continually review and refine policies and procedures to facilitate the development of low income and permanent supportive housing.

In the last twenty-four months, the policies and procedures enacted by the Napa County Board of Supervisors have resulted in the following outcomes for low- and very-low-income and permanent supportive housing development:

1. Acquisition and renovation of Wine Valley Lodge to convert an existing motel to 54 units of permanent supportive housing for individuals existing homelessness, opening in the Fall of 2022.
2. Acquisition and renovation of Adrian Court, a 14-unit, very-low-income permanent supportive housing project for individuals exiting homelessness, opened in January 2021.
3. Sale of 34 very-low-income affordable home-ownership housing units at Redwood Grove using \$1.6M in Affordable Housing funds, opened in July 2021.
4. Ground-breaking for Heritage Housing and Valle Verde, a low-and very-low-income housing project which will bring a combined total of 88-units of new housing using more than \$2.6M in County funding
5. Opening of Manzanita Family Apartments, a 51-unit very-low-income affordable housing complex.
6. Guideline update for the Napa County Proximity Workforce Housing Assistance program increasing down-payment assistance from 10% to 16.5% for low-and very-low-income workforce members with the purchase of a home in Napa County and doubling the annual investment in the program to \$2M for Fiscal Year 2022-2023.
7. Authorization for the creation of an Accessory Dwelling Unit (ADU) Loan Program to provide construction-loans for homeowners building ADU's in exchange for covenants restricting the rentals of those units to low-and very-low-income tenants and appropriating \$5M in funding for the loan program in Fiscal Year 2022-2023.

Finally, the existing County Affordable Housing loan portfolio includes active loans securing more than 1,100 units of affordable and permanent supportive housing in the Napa community.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.

Recommendation 8: City Managers and the County Executive Officer should disseminate more data and information about homelessness to educate Napa residents about the causes and extent of homelessness in Napa and its effects upon persons living on the street. An example would be developing respective government websites to include an information dashboard on homelessness and homelessness prevention.

Response, Director, Napa County Housing and Homeless Services: The recommendation has not yet been implemented but will be implemented in Fiscal Year 2022-2023.

The Director of Housing & Homeless Services agrees with the recommendation to expand and improve communication strategies to educate Napa residents about the causes and extent of homelessness in Napa. The County has an existing website (www.homelessnapa.com) with information including point-in-time (PIT) count data and social and shelter service provider information. This site can and should be enhanced to include more in-depth data sets, human-centered context surrounding that data, and dashboards tracking performance measures and outcomes as well as the detailed information, recommendations and goals included in the 2022 Strategic Plan to Address Homelessness.

Recommendation 9: The County CEO and Napa County Director of Corrections should work to convert the current Reentry Facility to transitional housing for the homeless.

Response, Director, Napa County Housing and Homeless Services and Director of Corrections: The recommendation has been implemented. The recommendation will require further analysis on whether this repurposing can become permanent.

The Acting County Executive Officer, Director of Corrections, Director of Probation and Director of Housing & Homeless Services have been engaged in ongoing conversations with the Board of State and Community Corrections (BSCC) regarding the repurposing or conversion of the Re-entry Facility to house County residents who are either experiencing homelessness or need transitional housing.

The CEO and Director initiated a request in April 2022 to the Board of State and Community Corrections to convert the Napa County Re-entry facility into a homeless shelter. As the approving authority of said request, the Department of Finance discussed the request at their standing April meeting. However, due to the complexities of the request, a decision wasn't reached at that time, and the request was re-scheduled for consideration at their May meeting. As of this writing, the Department of Finance has not made a final decision on the request to convert Re-entry into a homeless shelter. The CEO and the Director of Corrections continue to pursue the conversion authorization through the State.

Response, Acting County Executive Officer: The CEO agrees with the Director.

Response, Board of Supervisors: The Board of Supervisors agrees with the Director.