



2022 Action Plan

Covering the period from July 1, 2022 – June 30, 2023

a component of the
2018 – 2022 CONSOLIDATED PLAN

City of Bellingham

Washington

DRAFT: April 7, 2022

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Bellingham approved the 2018-2022 Consolidated Plan on May 17, 2018 (Resolution No. 2018-07). Since its adoption, the following has occurred:

- On July 20, 2018, the U.S. Department of Housing and Urban Development (HUD) approved the Consolidated Plan and 2018 Action Plan.
- On May 6, 2019, the 2019 Action Plan was approved by the City Council (Resolution No. 2019-14).
- On June 8, 2020, the 2020 Action Plan was approved by the City Council (Resolution No. 2020-13); this plan was modified and an amended Action Plan submitted to HUD following a public hearing at the December 10, 2020, Community Development Advisory Board meeting.
- On May 7, 2021, the 2021 Action Plan was approved by the City Council (Resolution No. 2021-10).

2022 is the fifth and final Action Plan year under the 2018-2022 Consolidated Plan. New activities selected for funding in the Plan are based on solicitation of proposals. Funding sources for these activities include federal HUD HOME and CDBG funds, as well as local City funds (Housing Levy, Affordable Housing Sales Tax, Real Estate Excise Tax, and General Fund). Due to the COVID-19 pandemic, special HUD allocations and federal State and Local Fiscal Recovery Funds (SLFRF) through the American Rescue Plan Act (ARPA) are also included. Specifically, the City sought applications for the following:

- **Rental Housing Development** – released on December 6, 2021, with applications due by January 24, 2022. No applications were received.
- **Housing Preservation and Shelter** – released on December 6, 2021, with applications due by January 24, 2022. No applications were received.
- **Community Facilities and Improvements** – December 6, 2021, with applications due by January 24, 2022. Five applications were received.

Several existing commitments from previous years are carried forward, including the homebuyer assistance program, tenant based rental assistance, preservation and rehabilitation projects, rental housing development projects, housing and services programs, and a safe tiny house encampment for the unsheltered.

2. Summarize the objectives and outcomes identified in the Plan

The City continues to prioritize housing development, homebuyer support, community facilities and housing and human services.

New Project Funding:

- One interim housing construction/development project would add to the City's housing inventory: an 25-30 unit non-congregate shelter facility for unhoused families with children.

- One Community Facility and Improvement childcare facility would be supported with funds for tenant improvements.
- Two Community Facility and Improvement childcare facilities would be supported with funds for acquisition.
- Funds would be set aside for urgent housing preservation needs.
- Housing Services funding would be allocated to seven agencies, all of which currently provide housing services to households in need through housing case management, diversion from homelessness, or other housing-related services for vulnerable households.
- Human and Social services funding would be allocated to 20 agencies continuing the intended 2-year commitment, addressing basic needs, affordable childcare, services to those with physical or cognitive impairment, or other services that reduce vulnerability to homelessness.

Carryover and Continuing Projects: Activities funded prior to 2022, or ongoing programs, are adjusted for remaining amounts anticipated to be spent in 2022-23 and/or adjustments in funding sources. These activities include: the homebuyer down payment assistance program, homeownership development (KulshanCLT, Telegraph Rd project phase 1b); five housing production projects (Bellingham Housing Authority, Samish Way Redevelopment phases 1 and 2; Mercy Housing NW, Barkley Family Housing and Millworks Family Housing; and Opportunity Council, Laurel & Forrest Senior Housing); general public facilities, housing preservation activities (manufactured home repair, emergency repair, and City owner-occupied rehabilitation program), and rental assistance and supportive services (Tenant Based Rental Assistance, housing services programs, human & social services programs). Ongoing programs in the rental assistance and supportive services program that are levy-funded include the Homeless Outreach Team, Homeless Service Center, and project-based housing assistance.

Contingency Projects: In the event that appropriations are greater or less than anticipated, or planned activities are cancelled, the following activities are proposed as contingencies: Tenant Based Rental Assistance (HOME), Housing Rehabilitation (CDBG), Housing Finance Commission Homebuyer (HOME), and Community & Public Facilities (CDBG), as well as modified funding amounts or sources for listed projects, in accordance with the Community Participation Plan.

3. Evaluation of past performance

This Action Plan is for the fourth year of the 2018-2022 Consolidated Plan. The City has completed three performance evaluation reports under the Consolidated Plan, the most recent reporting on the July 1, 2020 – June 30, 2021 Action Planning year. This performance report showed progress toward goals as follows:

- The goal of ‘Increase affordable housing supply for rental and interim housing’ showed thirty-seven percent progress;
- The goal of ‘Rehabilitation of existing units’ showed seventy-five percent progress;
- The goal of ‘Increase affordable housing supply for homeownership’ showed forty-seven percent progress;
- The goal of ‘Promote neighborhood equity’ showed twenty percent progress; and
- The goal of ‘Address and prevent homelessness’ showed one hundred and fifty-four percent progress.

4. Summary of Citizen Participation Process and consultation process

The public consultation process for the 2022 Action Plan included a 30-day public comment period,

and a public hearing before the Community Development Advisory Board (on March 10, 2022). The public was invited to comment on the Action Plan during the written comment period, which was held from February 22 – March 25, 2021.

The display ad providing notice of the public hearing and plan amendment was published in Bellingham Herald on February 23, 2022. All public participation and consultation was done in accordance with the City's Community Participation Plan that was adopted as part of the 2018 Consolidated Plan development process, and modified in early 2020.

5. Summary of public comments

No members of the public spoke at the public hearing or submitted written comments.

6. Summary of comments or views not accepted and the reasons for not accepting them

The Community Development Advisory Board reviewed the draft plan at their March 10 and April 14 meetings prior to making recommendations. No views were not accepted.

7. Summary

The 2022 Action Plan is intended to implement the priorities and strategies set forth in the 2018-2022 Consolidated Plan.

Lead & Responsible Agencies

PR-05 Lead & Responsible Agencies – 91.200(b)

The following describes the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	BELLINGHAM	
CDBG Administrator	BELLINGHAM	Planning and Community Development
HOPWA Administrator	N/A	
HOME Administrator	BELLINGHAM	Planning and Community Development
HOPWA-C Administrator	N/A	

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information:

Samya Lutz, Housing & Services Program Manager
Planning and Community Development Department
City of Bellingham
210 Lottie Street - Bellingham, WA 98225

Phone: 360-778-8385 or E-mail: slklutz@cob.org

Consultation

AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

The City of Bellingham works in partnership with other agencies, nonprofit organizations, the public housing authority and other citizens and stakeholders to identify the needs for affordable housing, community development and homelessness. These needs are documented in the 2018-2022 Consolidated Plan. Based on these needs, the Consolidated Plan consultation process included setting priorities based on the financial resources available through HUD and local sources.

The consultation process for an Annual Action Plan is to align resources with the goals and strategies outlined in the Consolidated Plan. The City provided an opportunity for agencies and nonprofits to submit proposals for funding assistance that would work to implement the goals and strategies of the 2018-2022 Consolidated Plan. The process to accept proposals resulted in numerous activities.

Funding requests exceeded the amount of anticipated resources in most categories. Where additional resources are available, it is within the City's local resources: Housing Levy, Affordable Housing Sales Tax, Real Estate Excise Tax, and locally-controlled SLFRF-ARPA dollars. CDBG and HOME grants, including the special COVID allocations and program income, are fully allocated in the 2022 Action Plan.

Including the listed agencies that were consulted, 151 individuals from 85 agencies were contacted to provide them with an opportunity to know that applications for funding assistance to implement the 2018-2022 Consolidated Plan were being accepted.

Enhancing Coordination

(91.215(l))

The public and assisted housing providers, as well as governmental health, mental health and service agencies, have close working relationships in Bellingham and Whatcom County. The Whatcom County Health Department is the lead agency for homeless housing, as well as public health, mental health and veteran's needs in our community. Coordination has been more challenging during the COVID-19 epidemic, due to the need for remote-only meetings. That said, all groups and committees have continued their work utilizing remote meeting platforms. The City is an active member of the Whatcom County Housing Advisory Committee and Whatcom County's Community Health Improvement Plan workgroup. The City also sits on the steering committee of the Whatcom Housing Alliance, a multi-sector group that advocates for equitable housing policies. The City's Community Development Advisory Board includes membership that represents ward areas throughout the City, and housing and social service providers, including a representative from the public housing authority.

Continuum of Care

Whatcom County is the lead agency for the Continuum of Care and the Plan to End Homelessness. The Whatcom Homeless Service Center is the coordinating entity for homelessness, including a single point of entry. The City has incorporated the goals, strategies, activities and outcomes for addressing homelessness in our community into the plan, ensuring consistency in policies and efforts.

The City participates actively in the local Coalition to End Homelessness, including the Steering Committee for this group, which strives to actively engage people who have or are experiencing homelessness, identify their needs, and respond accordingly, and has the primary goal of implementing the county's Local Plan to Address Homelessness, "A Home for Everyone."

The City has coordinated with Whatcom County and has incorporated their goals, strategies, activities

and outcomes in the Consolidated Plan. The City helps fund the Whatcom Homeless Service Center, which administers the Homeless Management Intake System (HMIS) for the community. City staff meet regularly with County staff and staff from the Whatcom Homeless Services Center (WHSC), as well as other partner agencies who participate in taking WHSC and Coordinated Entry referrals. The City and County strive to align their performance standards and expectations as much as possible and are in regular communication about funding allocations and changes over time. The City has a seat on the Whatcom County Housing Advisory Committee, which makes recommendations on County funding allocations.

Participating agencies, groups, organizations and others

Including the listed agencies that were consulted, 85 agencies and organizations were contacted to provide them with an advance opportunity to know that applications were being accepted for funding assistance to implement the 2018-2022 Consolidated Plan. In addition, discussion about the 2022 Action Plan process was included at Whatcom Coalition to End Homelessness steering committee meetings, and at the Whatcom County Housing Advisory Committee meetings, both of which include representatives from many local housing-related agencies as well as public representatives. The City also continues to follow its Community Participation Plan; specifically, the elements relevant to Action Plan development or modifications.

1	Agency/Group/Organization	BELLINGHAM HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Executive Director of the Bellingham Housing Authority is a member of the city's Advisory Board which recommends priorities and funding of the Action Plan.

2	Agency/Group/Organization	OPPORTUNITY COUNCIL
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy CHDO-eligible Activities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Opportunity Council was consulted and participated in development of the action items. In addition, because the Homeless Service Center is hosted by the Opportunity Council, strategies regarding homelessness were coordinated with them.

Table 2 – Agencies, groups, organizations who participated

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Whatcom County	Whatcom County drafted the Homelessness Strategy, and reviewed and commented on the Consolidated Plan. They also developed and continue to update the Countywide Health Improvement Plan. Whatcom County and City staff frequently assist one another in coordinated review of agency funding and activities.

Table 1 – Other local / regional / federal planning efforts

Participation

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process

A public display ad for this Action Plan was published in the Bellingham Herald on Wednesday, February 23, 2022 notifying the public of an opportunity to comment on the Action Plan and attend a public hearing. Notices were also sent out to stakeholders and the media and posted on the city's web site. The public hearing was held on March 10, and the public comment period was open through March 25. In addition, multiple Notices of Funding Availability (NOFAs) were published in December and distributed broadly, as discussed elsewhere in this plan. Responses to these NOFAs were what primarily impacted the goal setting.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing & comment period	Non-targeted/broad community	Held with advisory board members – no public in attendance	No general public comments received	N/A	
2	Newspaper Ad	Non-targeted/broad community	Display ad - no direct response requested	Display ad - no direct response requested	Display ad - no direct response requested	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220 (c) (1, 2)

HUD's 2022 allocation to the City of Bellingham were not released at the time of the draft Action Plan publication for public comment. Anticipated resources were based on prior year allocations; any necessary adjustments will be made in accordance with the contingency funding plan and the Community Participation Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available				Expected Amount Avail Remainder of ConPlan (\$)	Narrative Description
			Annual Allocation: (\$)	Program Income: (\$)	Prior Year Resources: (\$)	Total: (\$)		
CDBG	Public - Federal	Acquisition Admin and Planning Housing Public Improvements Public Services	\$840,208	\$710,000	\$256,078	\$1,806,286	\$0	Funds used for priority needs, including preservation of housing stock, lead-based paint, public improvements, public services and administration and planning.
CDBG-CV	Public – Federal	Public Services			\$412,564	\$412,564	\$0	Funds used for responding to the impacts of the coronavirus pandemic.
HOME	Public - Federal	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Multifamily rental new construction TBRA	\$602,793	\$120,000	\$150,717	\$873,510	\$0	Funds used for homebuyer assistance, tenant-based rental assistance, housing development (including CHDOs) and administration.
HOME-ARP	Public-Federal	Admin and Planning Multifamily rental new construction Non-congregate shelter Public Services TBRA			\$2,184,701	\$2,184,701	\$0	Funds used for responding to the impacts of the coronavirus pandemic on qualifying populations.

Program	Source of Funds	Uses of Funds	Expected Amount Available				Expected Amount Avail Remainder of ConPlan (\$)	Narrative Description
			Annual Allocation: (\$)	Program Income: (\$)	Prior Year Resources: (\$)	Total: (\$)		
Other	Public - Local	Acquisition Admin and Planning Homebuyer assistance Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Public Services TBRA	\$7,000,000		\$6,320,822	\$13,320,822	\$0	The City of Bellingham has a voter-approved housing levy and an affordable housing sales tax that support development and preservation of housing, as well as rental assistance and housing services. Local COVID relief funds are here as well.
Other	Public - Local	Public Services TBRA Childcare improvements Public improvements	\$583,100		\$628,862	\$1,211,962	\$0	This is the city's investment in housing, human and social services. It is predominantly city general fund dollars, but also includes some of the city's Real Estate Excise Tax.

Table 5 - Expected Resources – Priority Table

Federal Funds / Additional Resources

On average, for every dollar of federal funds the City expended on activities that were completed, the City leverages over \$12 of non-federal funds. In particular, rental housing development and human (public) service funding leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical housing and services to our community.

Discussion

Bellingham voters approved a Housing Levy renewal in 2018, assessing \$4 million per year to address housing development/preservation and housing services. Bellingham City Council approved a sales tax in 2021, bringing in an additional \$3 million (estimated) per year to address housing development and services. These funds are used to help support capital costs, rent and services, thus contributing to the federal matching requirements. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community, and aligned with the priorities of the local housing funds.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

The following table is a summary of the 2020 goals.

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase affordable housing rental supply	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs	MORE AFFORDABLE RENTAL HOUSING	HOME Local	Rental Units Constructed
2	Address and prevent homelessness	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	ADEQUATE RESPONSE TO HOMELESS CRISIS	CDBG HOME Local	Public service activities other than Low/Moderate Income Housing Benefit Public service activities for Low/Moderate Income Housing Benefit Tenant-based rental assistance / Rapid Rehousing
3	Preserve existing housing	2018	2022	Affordable Housing Non-Homeless Special Needs	REHABILITATION OF EXISTING UNITS	CDBG Local	Rental units rehabilitated Homeowner housing rehabilitated
4	Increase affordable homeowner housing supply	2018	2022	Affordable Housing	MORE MODERATE INCOME RESIDENTS AS HOMEOWNERS	HOME Local	Direct Financial Assistance to Homebuyers Homeowner Housing Added

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
5	Promote neighborhood equity	2018	2022	Non-Homeless Special Needs Non-Housing Community Development	EQUITY AND ECONOMIC MOBILITY	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit
6	Coordinate and improve delivery of services	2018	2022	Other	EDUCATION AND OUTREACH ON HOUSING ISSUES	CDBG HOME Local	Other (Administrative and coordination functions, as well as education and technical assistance to agencies.)

Goal Descriptions

1	Goal Name	Increase affordable housing rental supply
	Goal Description	The private market is unable to meet the demand for affordable housing units without assistance. The rise in housing costs, together with historically low vacancy rates and sluggish wage growth, makes it very difficult to find affordable housing. This need is the result of several contributing factors: lack of affordable, accessible housing in a range of unit sizes; low vacancy rate; and displacement of residents due to economic pressures.
2	Goal Name	Address and prevent homelessness
	Goal Description	Support low barrier shelter, rental assistance, and case management and diversion programs, as well as basic needs and assistance to very low income households. One of the contributing factors to this problem is lack of assistance for transitioning from institutional settings to integrated housing.
3	Goal Name	Preserve existing housing
	Goal Description	Rehabilitate owner-occupied and rental housing for low-income residents. The contributing factors this goal addresses are: displacement of residents due to economic pressures; and lack of assistance for housing accessibility modifications.

4	Goal Name	Increase affordable homeowner housing supply
	Goal Description	Support down-payment assistance and new homeownership opportunities. The contributing factor this addresses are: impediments to (economic) mobility and displacement of residents due to economic pressures. This goal is implemented through the City's homebuyer program administered by the Housing Finance Commission and support for new homeownership development.
5	Goal Name	Promote neighborhood equity
	Goal Description	Improve infrastructure and connectivity, equity of affordable housing distribution, and investments in facilities in low-income neighborhoods. The contributing factors this goal addresses are: lack of investment in specific neighborhoods, including services or amenities; land use zoning laws; disparities in access to opportunity.
6	Goal Name	Coordinate and improve delivery of services
	Goal Description	This goal is about education and administration supports. This includes public education on Fair Housing and housing issues, disaster preparedness, outreach to funding decision makers and policy makers. The contributing factor this goal addresses is disproportionate housing needs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

All new development of affordable housing is reflected in carry-over project applications that may reflect additional funding commitments. HOME funds will contribute to 5 units in the 77-unit Barkley Family Housing development. The City is supporting the development of a total of 317 affordable rental units and 4 affordable homeownership units that will be under construction in the 2022-2023 Action Plan year.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2022 Action Plan includes continuation of existing activities, renewal of ongoing activities, and new projects. The DRAFT (unbalanced) list is shown in the tables below.

2022 ACTION PLAN SUMMARY (Split into 2 tables – HUD & Local funding)

2022 ACTION PLAN SUMMARY - HUD					
RESOURCES ANTICIPATED	CDBG	CDBG-CV (incl state)	HOME	HOME-ARP	TOTAL
Grant/Allocation	852,590	-	602,793	-	1,455,383
Program Income (Loan Paybacks)	210,000	-	140,000	-	350,000
Prior Year Uncommitted/Deobligated Funds	-	-	-	2,184,701	2,184,701
EXISTING COMMITMENTS (AWARDS)	18,000	291,301	303,771	-	613,072
TOTAL:	\$ 1,080,590	\$ 291,301	\$ 1,046,564	\$ 2,184,701	\$ 4,603,156
ACTIVITIES	CDBG	CDBG-CV	HOME	HOME-ARP	TOTAL
Production Program					
Previous (Unspent) Commitments					
Lydia Place Hearthouse	-	-	-	-	-
Mercy HNW - Barkley Family Housing	-	-	179,581	-	179,581
Opportunity Council - Laurei & Forrest Senior Housing	-	-	-	-	-
Mercy HNW - Millworks Family Housing	-	-	-	-	-
BHA Samish Way Redevelopment - Phase 2	-	-	-	-	-
BHA Samish Way redevelopment - Phase 3	-	-	-	-	-
2022 Requests:					
FWC Interim Housing Facility	-	-	-	2,000,000	2,000,000
Barkley apartment preservation	-	-	-	-	-
Predevelopment assistance for new projects	-	-	-	-	-
Hold for rapid acquisition/preservation	-	-	-	-	-
CHDO Set Aside (min. 15% of HOME Grant)					
MHNW - Barkley Family Housing	-	-	90,419	-	90,419
Preservation & Shelter Program					
Previous Commitments					
2020 City Rehabilitation Program	15,000	-	-	-	15,000
2020 Manufactured Housing Repair	-	-	-	-	-
2022 Program:					
City Rehabilitation Program	520,000	-	-	-	520,000
Manufactured Housing Repair	-	-	-	-	-
2021 Emergency Repair	-	-	-	-	-
Acquisition and Opportunity Program					
Acquisition and Opportunity Fund	-	-	-	-	-
Rental Assistance and Supportive Services Program					
Carryover from Previous Commitments					
2021 FY Tenant Based Rental Assistance	-	-	-	-	-
2022 Program (includes Prior Commitments):					
Housing Project-Based Services	-	190,000	-	-	190,000
Homeless Service Center Admin	-	-	-	-	-
Homeless Outreach Team	-	-	-	-	-
GRACE	-	-	-	-	-
2022 FY Tenant Based Rental Assistance	-	-	194,800	-	194,800
Emergency Motel Stays	-	-	-	-	-
2022-23 NOFA Allocations:					
Housing Services	49,995	84,887	-	-	134,882
Human & Social Services	109,544	16,414	-	-	125,958
Hold for housing services	-	-	-	-	-
Community/Public Facility Program					
Previous (Unspent) Commitments					
BSD Fam Resource Center	3,000	-	-	-	3,000
BCEL repairs to meet licensing	-	-	-	-	-
Millworks Childcare	-	-	-	-	-
Barkley YMCA - TI in new building	-	-	-	-	-
LP Heart House Childcare	-	-	-	-	-
Samish Commons Childcare	-	-	-	-	-
2022 Requests:					
Boys & Girls Club Yew St Childcare acquisition	-	-	-	-	-
YMCA - Additional needed for TI in new building	-	-	-	-	-
Facilities - Acquisition/Development/repair	170,533	-	-	-	170,533
Homebuyer Program					
Previous Commitments					
Housing Finance Commission	-	-	1,771	-	1,771
KCLT Telegraph Rd, Ph 1-A&B	-	-	160,000	-	160,000
2021 Requests:					
WSHFC Continuing Allocation	-	-	345,714	-	345,714
Contingency Projects					
HOME - WSHFC, TBRA, Multifamily housing, CHDO operating	-	-	-	-	-
CDBG- Rehab program, Public Facilities, Services	-	-	-	-	-
Administration					
City Expenses	212,518	-	61,779	184,701	458,998
TBRA Administration (contract)	-	-	12,500	-	12,500
TOTAL:	\$1,080,590	\$291,301	\$1,046,564	\$2,184,701	\$4,603,156
BALANCE	\$ -	\$ -	\$ -	\$ -	\$ -

2022 ACTION PLAN SUMMARY - LOCAL							
RESOURCES ANTICIPATED	GENERAL FUND	REET	ARPA	AH SALES TAX	HOUSING LEVY	TOTAL	
Grant/Allocation	491,085	320,000	3,021,926	1,947,319	1,114,410	6,894,740	
Program Income (Loan Paybacks)	-	-	-	-	-	-	
Prior Year Uncommitted/Deobligated Funds	-	-	-	-	-	-	
EXISTING COMMITMENTS (AWARDS)	588,333	-	6,180,000	2,143,460	4,275,699	13,187,492	
TOTAL:	\$ 1,079,418	\$ 320,000	\$ 9,201,926	\$ 4,090,779	\$ 5,390,109	\$ 20,082,232	
ACTIVITIES	GENERAL FUND	REET	ARPA	AH SALES TAX	HOUSING LEVY	TOTAL	
Production Program							
Previous (Unspent) Commitments							
Lydia Place Hearthouse					128,370	128,370	
Mercy HNW - Barkley Family Housing					65,000	65,000	
Opportunity Council - Laurel & Forrest Senior Housing	-	-		1,800,000	200,000	2,000,000	
Mercy HNW - Millworks Family Housing	-	-	2,800,000	-	200,000	3,000,000	
BHA Samish Way Redevelopment - Phase 2	-	-			2,025,000	2,025,000	
BHA Samish Way redevelopment - Phase 3	-	-	1,375,000	-	528,500	1,903,500	
2022 Requests:							
FWC Interim Housing Facility				1,000,000		1,000,000	
Barkley apartment preservation			2,525,000			2,525,000	
Predevelopment assistance for new projects					120,000	120,000	
Hold for rapid acquisition/preservation		320,000				320,000	
CHDO Set Aside (min. 15% of HOME Grant)							
MHNW - Barkley Family Housing						-	
Preservation & Shelter Program							
Previous Commitments							
2020 City Rehabilitation Program						-	
2020 Manufactured Housing Repair					40,000	40,000	
2022 Program:							
City Rehabilitation Program						-	
Manufactured Housing Repair					135,000	135,000	
2021 Emergency Repair					50,000	50,000	
Acquisition and Opportunity Program							
Acquisition and Opportunity Fund						-	
Rental Assistance and Supportive Services Program							
Carryover from Previous Commitments							
2021 FY Tenant Based Rental Assistance			-		1,500	1,500	
2022 Program (includes Prior Commitments):							
Housing Project-Based Services	65,370	-		268,000	408,261	741,631	
Homeless Service Center Admin	46,860	-		-	33,640	80,500	
Homeless Outreach Team	196,103	-		-	210,000	406,103	
GRACE	280,000	-		-	-	280,000	
2022 FY Tenant Based Rental Assistance	-	-		-	16,500	16,500	
Emergency Motel Stays	50,000		100,000	175,000	-	325,000	
2022-23 NOFA Allocations:							
Housing Services	-	-		607,779	634,410	1,242,189	
Human & Social Services	441,085	-		-	-	441,085	
Hold for housing services						-	
Community/Public Facility Program							
Previous (Unspent) Commitments							
BSD Fam Resource Center	-	-		-	-	-	
BCEL repairs to meet licensing	-	-		-	-	-	
Millworks Childcare	-		1,000,000	-	-	1,000,000	
LP Heart House Childcare	-		155,000	-	-	155,000	
Samish Commons Childcare	-		750,000	-	-	750,000	
2022 Requests:							
Boys & Girls Club Yew St Childcare acquisition			200,000			200,000	
YMCA - TI in Barkley building			296,926			296,926	
Homebuyer Program							
Previous Commitments							
Housing Finance Commission					73,928	73,928	
KCLT Telegraph Rd, Ph 1-A&B					40,000	40,000	
2021 Requests:							
WSHFC Continuing Allocation					240,000	240,000	
Contingency Projects							
HOME - WSHFC, TBRA, Multifamily housing, CHDO operating						-	
CDBG - Rehab program, Public Facilities, Services						-	
Administration							
City Expenses				240,000	240,000	480,000	
TBRA Administration (contract)						-	
TOTAL:	\$1,079,418	\$320,000	\$9,201,926	\$4,090,779	\$5,390,109	\$20,082,232	
BALANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	

2022 ACTION PLAN RENTAL ASSISTANCE AND SERVICES – Details

					CITY GENERAL			CITY HOUSING		TOTAL
	CDBG	CDBG-CV	HOME	HOME-ARP	FUND	CITY REET/ARPA	CITY 1590	LEVY		
Existing Commitments:	-	291,301	-	-	588,333	100,000	75,460	653,401	\$	1,708,495
New or Reprogrammed Revenue:										
Housing Services & Rent Assistance	49,995		194,800	-	-		532,319	650,910	\$	1,428,024
Human and Social Services	109,544				441,085				\$	550,629
Project-based Rent and Services							268,000		\$	268,000
Emergency Shelter Services					50,000		175,000		\$	225,000
TOTALS	\$ 159,539	\$ 291,301	\$ 194,800	\$ -	\$ 1,079,418	\$ 100,000	\$ 1,050,779	\$ 1,304,311	\$	4,180,148
2022 PROGRAM										
PROGRAM	CDBG	CDBG-CV	HOME	HOME-ARP	CITY GENERAL			CITY HOUSING		TOTAL
					FUND	CITY REET/ARPA	CITY 1590	LEVY		
Rental Assistance										
Existing Commitments:										
2021 FY Tenant Based Rental Assistance								1,500		\$1,500
2022 Program:										
Tenant Based Rental Assistance Program			194,800					16,500		\$211,300
Housing Services										
Existing Commitments:										
Homeless Service Center Admin					46,860			33,640		\$80,500
Homeless Outreach Team					196,103			210,000		\$406,103
2022-23 Competitive:										
HSC - Housing Lab / Housing Navigator								54,000		\$54,000
Lydia Place - Family Services & Heart House							307,290	122,710		\$430,000
OC - Rapid Re-Housing & Diversion for Families & Seniors		84,887					300,489	263,000		\$648,376
NWYS Ground Floor day center for hmls youth								85,000		\$85,000
NWYS - Transitional Living Program								48,000		\$48,000
NWYS - PAD Program	49,995									\$49,995
DVSAS - Safe Shelter								29,700		\$29,700
YWCA - Larrabee Residence								32,000		\$32,000
Additional Housing Services										\$0
Held for Emergency Motel Stays					50,000	100,000	175,000			\$325,000
Project-Based Rental Assistance & Housing Services										
Existing Commitments:										
Francis Place Housing Services								178,000		\$178,000
Sun (Greggie's & Nevada) Housing Services								87,404		\$87,404
Opportunity Council / NWYS 22 North Housing Services								142,857		\$142,857
LIHI - Tiny House Village		190,000			65,370		268,000			\$523,370
Held for additional Housing & Project-based Services										\$0
Human & Social Services										
Existing Commitments:										
GRACE-LEAD					280,000					\$280,000
2022-23 Competitive:										
Lydia - Mental Health Counseling	21,534				49,359					\$70,893
BFB - Free Grocery Program	22,942				27,058					\$50,000
DVSAS - Safe Start Program					21,350					\$21,350
NWYS - Vocational Readiness Program					25,900					\$25,900
OC - Volunteer Chore Program					29,600					\$29,600
NWYS - Teen Court					24,300					\$24,300
WLC - Gaining Jobs & Improving Self-Sufficiency Through Literacy					15,000					\$15,000
BCFSC - Target Intensive Case Management										\$30,000
St Francis Foundation - Generations Tuition	30,000				15,000					\$15,000
WDRC - Parent / Teen Mediation					15,000					\$15,000
OC - Maple Alley Inn					28,000					\$28,000
WCOA - Meals on Wheels Bellingham	35,068				14,932					\$50,000
Rebound Roots					15,000					\$15,000
BCELC - Childcare & Early Learning Services					20,000					\$20,000
SHH - Residential Services for Adults Living with AIDS					15,000					\$15,000
MNW - Senior Support Services					15,000					\$15,000
BPS - Carl Cozier Family Resource Center		6,414			53,586					\$60,000
BGC - Kids' World Assistance		10,000			27,000					\$37,000
Max Higbee - Weekday Program					30,000					\$30,000
TOTAL ALLOCATIONS	\$159,539	\$291,301	\$194,800	\$0	\$1,079,418	\$100,000	\$1,050,779	\$1,304,311	\$	\$4,180,148
BALANCE:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Geographic Distribution

AP-50 Geographic Distribution – 91.220(f)

Funds are distributed throughout the City. The City does not have any target areas nor areas of minority concentration. Many projects are delivered city-wide or are in scattered locations. The Central Business District and urban village areas include land that is compatible with multi-family development with access to services.

Geographic Distribution

Target Area	Percentage of Funds
City of Bellingham	100

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City encourages equity in affordable housing and services throughout the geographic area. This includes diversifying urban village areas, investment of public facilities and improvements in low-income neighborhoods, adding new subsidized housing units in higher income neighborhoods, and acquiring existing ‘naturally occurring’ rental units in higher poverty neighborhoods.

Discussion

Program activities are not strictly limited to serving any areas but are instead designed to promote geographic equity of housing and services throughout the City.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Affordable housing support includes rental assistance, new rental construction, homebuyer program and housing services.

One Year Goals for the Number of Households to be Supported	
Homeless	608
Non-Homeless	566
Special-Needs	6
Total	1,180

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance and Services	1,123
The Production of New Units	26
Rehab of Existing Units	27
Acquisition of Existing Units	4
Total	1,180

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Leveraging local funds and federal dollars has helped create more opportunities for housing locally, yet there is still a vacancy rate hovering under 2%, high homeless population, more capacity needed in the local workforce, and severe need for additional affordable housing.

Public Housing

AP-60 Public Housing – 91.220(h)

The Bellingham Housing Authority provides public housing and affordable housing in Bellingham. The Housing Authority has been innovative in their pursuit of projects to meet the needs of the community.

Action to address Public Housing Needs

The City will continue to work with the Bellingham Housing Authority (BHA) to address their needs.

1. The City will continue to support the Bellingham Housing Authority's program to involve residents in the management of the Housing Authority and their property.
2. The City will involve public housing residents in future updates to Fair Housing plans and provide them with Fair Housing information.
3. The City will encourage the Housing Authority to provide information about homeownership opportunities to public housing residents.
4. The City continues to collaborate with the Housing Authority on the development of the Samish Way site which was sold by the City to the Housing Authority with flexible terms. Phase I's 69 units are now occupied, and phases II and III are in construction. The final two buildings will offer an additional 102 affordable housing units.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The City will continue to share educational information about the City's homeownership downpayment assistance program, and about Kulshan CLT's and Habitat for Humanity's homeownership programs.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

The City is fortunate to have a well-managed public housing authority. The City will work to support their efforts to meet the needs of their residents, whether in their inventory of public housing or their multifamily (tax credit) projects.

Homeless and Other Special Needs Activities

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

The Whatcom Homeless Service Center (HSC), a program of the Opportunity Council (OC), operates a centralized and coordinating homeless housing service center that serves the homeless population in the City of Bellingham. This Center serves as a hub for all homeless housing related activity in the community, including the coordination of homeless housing service providers and the management of the local homeless management information system (HMIS) by operating a single-point of entry.

One-Year Goals and Actions for Reducing & Ending Homelessness

The City's two highest priorities regarding addressing homelessness are to: support the development of emergency shelter in a safe, permanent location; and support programs to prevent chronic homelessness through intervention services like diversion and light touch case management. This Action Plan reflects continued support for agency programs that provide diversion and rapid rehousing for families and seniors. The City partnered with the Low Income Housing Institute and Road2Home to set up and operate a tiny house village to provide emergency shelter with supportive services, in coordination with the HSC and utilizing HMIS. The City continues to make available city property for temporary encampments and tiny house villages in multiple locations, and work with partner agencies on permanent emergency shelter solutions.

People who are homeless or at risk of becoming homeless may choose to enter the housing system through the HSC, and are then assigned case management and/or placement as available from an array of partnering, non-profit housing agencies. Housing counseling and advocacy become a significant part of the case management support provided. More general counseling and advocacy services are also available to low-income people at the Community Resource Center of the Opportunity Council which offers information and referral services to help people seeking a variety of services in addition to housing services. Bellingham has a variety of outreach services targeting the homeless population. The Homeless Outreach Team ("HOT team") has been operating since 2015 using local Housing Levy funds and more recently County support; the City contracted with the Opportunity Council for these services, and increased support for expansion of this team in 2021. The City is also part of a program in coordination with the County, and with the support of health care providers called Ground Level Response and Coordinated Engagement (GRACE). The GRACE program targets both housed and unhoused individuals who are frequent users of emergency services and offers additional assistance through embedded case workers within the Fire and Police departments. Both the HOT team and GRACE will continue their operations this Action Plan year, and GRACE is now being expanded to add a Law Enforcement Assisted Diversion (LEAD) program.

Other services available to assist those experiencing or at risk of homelessness include: Hope House, a program of Catholic Community Services; the Homeless Disability Benefits Advocacy Program; Base Camp shelter and program services run by Lighthouse Mission Ministries including a Mobile Outreach Team; the CORES program targeting mental health needs; and several meal programs. These programs have all undergone adaptations in the past two years due to the coronavirus pandemic, but they are all continuing to serve those in need. UnityCare Community Health Center provides on-site medical care services at Base Camp one day per week and offers dental services at their downtown site. Periodic mobile vaccine clinics are provided by the County Health Department for low-income residents, and the health department has been partnering to provide COVID-19 testing and vaccinations as needed.

Emergency Shelter / Transitional Housing

The City's strategy on homelessness encourages rapid rehousing of those that are homeless and targeted prevention for those that are at risk of becoming homeless. The City supports existing emergency shelter and transitional housing in the community through the city's public (human) service grant program, and with the Low Income Housing Institute/Road2Home to operate a tiny house village.

As seen across the State, the number of homeless persons in Bellingham and Whatcom County is not subsiding. The City administration continues to seek ways to partner with agencies to increase the number of beds available to persons living unsheltered, though this must be balanced with long-term solutions. City funds also support utilizing motels as a sheltering option for families with children, and is committed to finding better, more trauma-informed options for sheltering this population.

Helping homeless persons make the transition to permanent housing and independent living

The Homeless Service Center (HSC) administers rental subsidies (local funds) to homeless and at-risk households and matches the subsidy with case management support provided by one of several partnering, nonprofit housing agencies. Families with children, youth, and veteran households are among the populations that are supported by rental subsidies and case management. Additionally, the HSC administers Supportive Housing Program (SHP) subsidies to people who are chronically homeless, and coordinates the placement of vulnerable adults experiencing homelessness in the five permanent supportive housing facilities in Bellingham when there are openings. HSC also works closely with the Opportunity Council's Community Resource Center to operate the Rapid Rehousing program for families with moderate housing barriers who are homeless, including survivors of domestic violence. The following are some of the employment and job training programs that serve people who are homeless in Bellingham: WorkSource One-Stop Center, Opportunity Council employment specialist, Lake Whatcom Treatment Center and Compass Health employment specialists, Northwest Youth Services jobs training, and Department of Vocational Rehabilitation.

Helping low-income individuals and families avoid becoming homeless

The Homeless Service Center (HSC) helps to coordinate housing placements for people re-entering the community from institutions and implements a housing program for people on State disability assistance. Pioneer Human Services operates a 37-unit apartment (City Gate) that includes units for offenders re-entering from jail, as well as units for veterans. The City's increased support for diversion services targeting families with children and seniors offers assistance for those at risk of homelessness, with referrals coming both through the HSC and through the school district homeless liaisons. The City also offers assistance to childcare facilities that provide services to low-and moderate-income families through the human services program. Low-income families who have reliable and affordable childcare are more resilient to homelessness as parents can further their careers, providing more stability for their families.

Discussion

Despite past strides in bringing down the numbers of homeless families awaiting housing, Bellingham has struggled with rising family homelessness. The most significant barrier to accomplishing the goal to end homelessness in the community is funding and the constraint in the supply of housing, along with workforce shortages. With additional funding, the community has shown that it can have a significant effect on the number of homeless in our community, but that funding has not kept pace with increased costs and increased demand.

Barriers to Affordable Housing

AP-75 Barriers to affordable housing – 91.220(j)

The foundation of the City’s Consolidated Plan was built on a variety of public outreach activities aimed at understanding barriers to affordable housing and fair housing. Specifically, the City convened a Community Solutions Workgroup (CSW) with multi-disciplinary stakeholders to tackle these issues and make recommendations that fed into the Consolidated Plan. The City also continues to review recommendations targeted at removing remove barriers to affordable housing: 1) Develop additional housing production revenue sources; 2) Strive to reduce land and building costs; and 3) Provide incentives for the creation of affordable housing. Many measures have been implemented regarding these recommendations, but more is needed as there continue to be significant challenges. In addition, the current County Health Improvement Plan (CHIP) process has identified housing for families with children as one of three top priorities for improving community health. The City is an active participant in implementation efforts related to the CHIP.

Actions planned to remove barriers

The City continues to work with developers to encourage utilization of multifamily tax exemption incentives, and partners with developers on low income tax credit and bond financed projects. Work by City staff to analyze the menu of incentives available to housing developers and determine the most effective way to encourage more for-profit developers to build additional affordable housing units was put on hold due to staffing demands during COVID-19, but will again get underway when possible. The city also analyzes any unutilized or underutilized land that may be able to be used for housing development partnerships. The City also offers reductions for low-income housing with regard to certain fees and charges that affect affordability.

Discussion

The City remains committed to removing or ameliorating the negative effects of public policies that serve as barriers to affordable housing.

Other Actions

AP-85 Other Actions – 91.220(k)

The City will undertake, or support the efforts of other agencies, that meet the needs of low-income persons and households.

Actions planned to address obstacles to meeting underserved needs

- The City will work with other funding agencies, including Whatcom County, United Way of Whatcom County and private foundations, to coordinate funding to more effectively meet the needs of the community.
- The City will seek opportunities to increase funding available for affordable housing.
- The City will work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.

Actions planned to foster and maintain affordable housing

- Most of the city's affordable housing inventory is owned and managed by non-profit housing providers. The City works in partnership with the Washington State Housing Finance Commission to monitor expiring tax credit projects, and maintains a pathway for rapid acquisition to preserve affordable housing at risk of being lost from the local inventory. To the extent willing nonprofits have the capacity to do so, the City will work with providers when time comes to expand their inventory and/or renew tax credits or pursue other strategies to ensure continued viability of the housing.

Actions planned to reduce lead-based paint hazards

- All housing rehabilitation efforts on homes that were built before 1978 will include lead-based paint hazard evaluations. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.
- The City will continue to provide educational information about the hazards of lead-based paint. Information is available on the City's web site, and City staff provides information targeted to parents of young children through specific outreach to day care centers.

Actions planned to reduce the number of poverty-level families

- The City will support the efforts of non-profit agencies that are working to reduce the number of poverty-level families. These efforts include the Asset Building Coalition sponsored by the Opportunity Council, and the work of United Way, the Whatcom Community Foundation, Mount Baker Foundation and Chuckanut Health Foundation of Whatcom County.
- The City will support the efforts of other public agencies that work to reduce the number of people in poverty. Whatcom County and Washington State's WorkFirst Program work towards

this end, as well as WorkSource and GoodWill Industries.

Actions planned to develop institutional structure

- The City will continue to work with public and nonprofit funding agencies to identify ways to coordinate and improve the effectiveness of the institutional system of funding housing and low-income community development needs in the community.
- The City will continue to work with all housing and human service agencies to coordinate and improve communications. The Community Development Advisory Board will be one mechanism for hearing other program and institutional issues and addressing ways to improve the system in Bellingham.

Actions planned to enhance coordination between public and private housing and social service agencies

- The City will continue to support the efforts of the Whatcom County Coalition to End Homelessness Steering Committee, which coordinates the actions of housing and social service agencies in the community; as well as participate in committees focused on addressing supportive services in all housing where it's needed.

Discussion

Voters in the City of Bellingham approved a Low-income Housing Levy in 2012, and again in 2018. This levy is now providing \$4 million per year over ten years. The City began implementation of this levy in 2013, using the needs and priorities identified in the Consolidated Plan as a baseline for this program. Bellingham City Council approved a local sales tax in 2021, bringing in an additional \$3 million (estimated) per year to address housing development and services. As a result of these local funds, significant attention is able to be paid to addressing obstacles, affordable housing supply, institutional structure and coordination.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

The 2022 Action Plan continues proven programs that the City has implemented for many years, including rehabilitation of homeowner units, homebuyer assistance, public (human) services, tenant-based rental assistance and housing development. The entirety of the anticipated CDBG program income has already been reprogrammed through projects included in this action plan (and tied to this or previous years).

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|--|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | 0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan. | 0 |
| 3. The amount of surplus funds from urban renewal settlements | 0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan | 0 |
| 5. The amount of income from float-funded activities | 0 |
| Total Program Income: | 0 |

Other CDBG Requirements

- | | |
|--|--------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan: 2020, 2021, 2022 | 75.00% |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

No other forms of investment are used beyond those identified in Section 92.205.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for**

homebuyer activities as required in 92.254, is as follows:

The City of Bellingham has selected the resale and recapture provisions that comply with HOME statutory and regulatory requirements. These policies are selected based on program, and not on a case-by-case basis. The City's Resale and Recapture policies are included by reference, and also in the unique appendices to this Action Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City has a monitoring policy and procedure to ensure affordability of units acquired with HOME funds. Annual notices are provided to HOME-funded properties regarding new income determinations, HOME rents and utility allowances. Annual income certifications are received from the properties, a desk review is completed, and – when public health protocols allow – on-site inspection is completed based on a risk-assessment schedule and HOME rules for monitoring.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds are not proposed to assist in the refinancing of existing debt secured by multifamily housing that is rehabilitated with HOME funds.