



## 2022 Action Plan

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

### a component of the 2018 – 2022 CONSOLIDATED PLAN

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**City of Bellingham**

**Washington**

**June 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

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic 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 is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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**

Summary from citizen participation section of plan.

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**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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.

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

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe 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		
HOME Administrator	BELLINGHAM	Planning and Community Development
HOPWA-C Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

**Consolidated Plan Public Contact Information**

Samya Lutz, Housing & Services Program Manager Planning and Community Development Department

City of Bellingham

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

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

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.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

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.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

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.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

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. City staff is also participating in a new Coordinated Entry Governing Body that is reviewing local Coordinated Entry and HMIS policies and procedures, and making recommendations for implementation improvements.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	BELLINGHAM HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	OPPORTUNITY COUNCIL
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing

<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy CHDO-eligible activities
<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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.

**Identify any Agency Types not consulted and provide rationale for not consulting**

**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 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

**AP-12 Participation – 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

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 Meeting	Non-targeted/broad community	Held with advisory board members No public chose to be 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	N/A	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

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; adjustments were 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 Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	836,947	210,000	0	1,046,947	0	Funds used for priority needs, including preservation of housing stock, lead-based paint, public improvements, public services and administration and planning.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	672,057	140,000	0	812,057	0	Funds used for homebuyer assistance, tenant-based rental assistance, housing development (including CHDOs) and administration.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other	public - local	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Public Services TBRA	21,918,872	0	0	21,918,872	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	Admin and Planning Public Services TBRA	1,079,418	0	0	1,079,418	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

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

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.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

No publically owned land is proposed for use during this Action Plan year.

**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

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase affordable rental housing supply	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs		More affordable rental housing	HOME: \$332,338 City Housing Levy: \$11,179,532	Rental units constructed: 317 Household Housing Unit
2	Address and prevent homelessness	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development		Adequate response to homeless crisis	CDBG: \$159,539 HOME: \$194,800 City General Fund: \$1,079,418 City Housing Levy: \$1,921,271	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 400 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Preserve existing housing	2018	2022	Affordable Housing Non-Homeless Special Needs		Rehabilitation of existing units	CDBG: \$520,000 City Housing Levy: \$4,635,000	Rental units rehabilitated: 143 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit
4	Increase affordable homeowner housing supply	2018	2022	Affordable Housing		More moderate income residents as homeowners	HOME: \$203,714 City Housing Levy: \$313,928	Homeowner Housing Added: 4 Household Housing Unit Direct Financial Assistance to Homebuyers: 8 Households Assisted
5	Promote neighborhood equity	2018	2022	Non-Homeless Special Needs Non-Housing Community Development		Equity and economic mobility	CDBG: \$158,019 City Housing Levy: \$2,076,393	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 550 Persons Assisted
6	Coordinate and improve delivery of services	2018	2022	Advocacy and Service Delivery		Education and outreach on housing issues	CDBG: \$209,389 HOME: \$81,205 City Housing Levy: \$480,000	Other: 1 Other

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Increase affordable rental housing supply
	<b>Goal Description</b>	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	<b>Goal Name</b>	Address and prevent homelessness
	<b>Goal Description</b>	Support 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	<b>Goal Name</b>	Preserve existing housing
	<b>Goal Description</b>	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	<b>Goal Name</b>	Increase affordable homeowner housing supply
	<b>Goal Description</b>	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	<b>Goal Name</b>	Promote neighborhood equity
	<b>Goal Description</b>	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	<b>Goal Name</b>	Coordinate and improve delivery of services
	<b>Goal Description</b>	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.



# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The 2022 Action Plan includes continuation of existing activities, renewal of ongoing activities, and new projects, including the City’s continued response to the COVID epidemic.

### Projects

#	Project Name
1	Rental and Interim Housing Development
2	Human and Social Services
3	Housing Services
4	Rental Assistance
5	Rental or Interim Housing Preservation
6	Owner Occupied Rehab and Repair
7	Homebuyer Program
8	Community Facilities and Improvements
9	Planning and Management

**Table 7 - Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

These allocations selected for funding were primarily based on solicitation of proposals which used the City's priorities identified in the 2018-2022 Consolidated Plan. Priorities reflect the goals in the Consolidated Plan, as combined with the local capacity to deliver housing and services. Bellingham continues to need a drastic increase in the supply of housing as the vacancy rate is very low. Human services needs are great due in part to the ongoing and persistent economic impacts of the COVID-19 epidemic.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Rental and Interim Housing Development
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase affordable rental housing supply
	<b>Needs Addressed</b>	More affordable rental housing
	<b>Funding</b>	HOME: \$332,338 City Housing Levy: \$11,179,532
	<b>Description</b>	This project includes multiple activities to increase the supply of affordable housing for families, special needs, and the general low-income population, and permanent supportive housing for homeless-on-entry.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	317 units of housing are estimated to be completed through these project activities - all serving low and very low income households
	<b>Location Description</b>	Mercy Barkley Family Housing (now called Trailview) - Rimland Drive (continuing project, completion due this AP year)  Samish Way, phase 2 – 315 Samish Way (continuing project, completion due this AP year)  Samish Way, phase 3 – 315 Samish Way (continuing project, completion due this AP year)  Millworks Housing – Laurel & Cornwall (continuing project, construction beginning this AP year)  Downtown Senior Housing – Laurel & Forrest (continuing project, construction beginning this AP year)  Predevelopment Assistance – Scattered Sites
<b>Planned Activities</b>	All of the specific projects listed are continuing new construction of affordable housing for a mix of families, seniors, those with special needs, and general low-income, and they have been included in prior Action Plans. Two have additional funding committed for this AP (Barkley/Trailview and Laurel-Forest); also included is support for two additional projects in the very early stages of development to determine feasibility.	
2	<b>Project Name</b>	Human and Social Services
	<b>Target Area</b>	

<b>Goals Supported</b>	Address and prevent homelessness
<b>Needs Addressed</b>	Adequate response to homeless crisis
<b>Funding</b>	CDBG: \$109,544 City General Fund: \$721,085
<b>Description</b>	The human and social service project category is for those services that meet one or more of the following goals: Increase access to affordable childcare; Increase economic security and reduce vulnerability; Increase access to mental health services; Increase access to basic needs (excluding housing); Promote integration and coordination between systems.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1,200 general and special needs low-income individuals, including those experiencing or at risk of homelessness.
<b>Location Description</b>	Scattered sites.



	<b>Planned Activities</b>	<p>GRACE project, 280,000</p> <p>Lydia Mental Health Counseling, 70893</p> <p>Free Grocery Program, 50,000</p> <p>Providing Help &amp; Healing for Children of DV Victims 'Safe Start', 21,350</p> <p>Vocational Readiness, 25,900</p> <p>Volunteer Chore Program, 29,600</p> <p>Teen Court, 24,300</p> <p>Gaining Jobs through Literacy, 15,000</p> <p>Target Intensive Case Management, 30,000</p> <p>Generations Childcare &amp; Early Learning, 15,000</p> <p>Parent / Teen Mediation, 15,000</p> <p>Maple Alley Inn meal program, 28,000</p> <p>Meals on Wheels, 50,000</p> <p>Rebound Roots, 15,000</p> <p>Childcare &amp; Early Learning Center, 20,000</p> <p>Services for Adults Living with AIDS / HIV, 15,000</p> <p>Farm Worker &amp; Senior Support Services, 15,000</p> <p>Bellingham School District Family Resource Center, 60,000</p> <p>Boys &amp; Girls Club Kids World, \$37,000</p> <p>Max Higbee Day Center, \$30,000</p>
3	<b>Project Name</b>	Housing Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Address and prevent homelessness
	<b>Needs Addressed</b>	Adequate response to homeless crisis
	<b>Funding</b>	<p>CDBG: \$49,995</p> <p>City General Fund: \$358,333</p> <p>City Housing Levy: \$1,035,340</p>

<b>Description</b>	The housing services' program reflects services that meet one or more of the following goals: Reduce the number of homeless (including reduce those who newly enter homelessness); Reduce the length of time spent homeless; Increase the number of people moving into permanent housing after receiving assistance; Reduce the number of people who return to homelessness after obtaining permanent housing.
<b>Target Date</b>	6/30/2023
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 300 general and special needs low-income households, including those experiencing or at risk of homelessness.
<b>Location Description</b>	Scattered sites.
<b>Planned Activities</b>	Project Name, Allocation: Homeless Service Center and Housing Lab assistance, \$134,500 OC - Homeless Outreach Team, \$406,103 NWYS – Ground Floor youth \$85,000 Transitional Living, \$48,000 Positive Adolescent Development, \$49,995 Domestic Violence Safe Shelter, \$29,700 Larrabee Residence, \$32,000 Gardenview Tiny House Village, \$523,370 Emergency shelter/vouchers for homeless families and special needs populations, \$325,000
<b>4</b>	<b>Project Name</b> Rental Assistance
<b>Target Area</b>	
<b>Goals Supported</b>	Address and prevent homelessness
<b>Needs Addressed</b>	Adequate response to homeless crisis
<b>Funding</b>	HOME: \$194,800 City Housing Levy: \$1,119,261
<b>Description</b>	This project includes tenant-based rental assistance, rapid re-housing vouchers & housing assistance, and project-based housing assistance.

	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 250 households - all low income or very low income.
	<b>Location Description</b>	Scattered sites for tenant-based rental assistance and rapid rehousing vouchers. Project-based housing assistance is dedicated on an annual basis to Francis Place, 22 North, Sun Greggie’s House, Sun Nevada St PSH, and Lydia Place Heart House.
	<b>Planned Activities</b>	<p>The activities in this project include:</p> <ul style="list-style-type: none"> <li>• Tenant-based rental assistance - HOME and local funds are provided to the Opportunity Council and Lydia Place to provide tenant-based rental assistance, with the priority being families that are homeless.</li> <li>• Rapid re-housing vouchers and diversion - Local funds are provided to the Opportunity Council and Lydia Place to support rapid re-housing of homeless persons &amp; associated services, or assistance that diverts households from homelessness.</li> <li>• Project-based Housing Assistance - Local Levy funds are provided to projects to support operating costs (rent payments or services and operations).</li> </ul>
5	<b>Project Name</b>	Rental or Interim Housing Preservation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve existing housing
	<b>Needs Addressed</b>	Rehabilitation of existing units
	<b>Funding</b>	City Housing Levy: \$4,375,000
	<b>Description</b>	Includes support of existing facilities that provide shelter, rental housing and/or transitional housing to maintain safe and affordable living environments.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 140 households will benefit from these activities.

	<b>Location Description</b>	Scattered sites for emergency repair. One large rental housing acquisition and preservation project: Evergreen Ridge Apartments, 3451 Woburn St, Bellingham.
	<b>Planned Activities</b>	Annual offering of funds for emergency repair of transitional, permanent housing or shelter facilities. Assistance with acquiring, preserving, and rehabilitating existing rental housing at end of tax credit compliance period and at risk of converting to market rate housing and displacing dozens of very low income households.
<b>6</b>	<b>Project Name</b>	Owner Occupied Rehab and Repair
	<b>Target Area</b>	
	<b>Goals Supported</b>	Preserve existing housing
	<b>Needs Addressed</b>	Rehabilitation of existing units
	<b>Funding</b>	CDBG: \$520,000 City Housing Levy: \$260,000
	<b>Description</b>	This project includes both the city's owner-occupied rehabilitation program and a manufactured home repair program sponsored by the Opportunity Council.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 25 households will benefit from these activities - mostly low-income, with some very low and moderate income.
	<b>Location Description</b>	Scattered sites.
	<b>Planned Activities</b>	This project consists of two activities: City of Bellingham Homeowner Rehabilitation Program - the City offers financial assistance to owner-occupied homes that need critical repairs to meet minimum housing standards. The City uses CDBG funding to meet this need. Manufactured Home Repair Program - the City provides local housing levy funds to the Opportunity Council to repair and weatherize owner-occupied manufactured homes.
<b>7</b>	<b>Project Name</b>	Homebuyer Program
	<b>Target Area</b>	

	<b>Goals Supported</b>	Increase affordable homeowner housing supply
	<b>Needs Addressed</b>	More moderate income residents as homeowners
	<b>Funding</b>	HOME: \$203,714 City Housing Levy: \$313,928
	<b>Description</b>	The City supports financial assistance to low-income homebuyers through downpayment assistance programs with the WA State Housing Finance Commission, as well as new homebuyer acquisition and construction projects.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 12 low-income households will benefit from these activities.
	<b>Location Description</b>	Scattered sites and upcoming phases of Telegraph Road new townhome development project.
	<b>Planned Activities</b>	Two activities supported by this program are managed through the WA State Housing Finance Commission for low-income and very-low income households on a scattered site basis: Restricted downpayment assistance program (in partnership with Kulshan Community Land Trust); and Unrestricted downpayment assistance program.  In addition, the Telegraph Road construction project managed jointly by Kulshan CLT and Habitat for Humanity is supported for the next phase (1b) of four additional homes.
<b>8</b>	<b>Project Name</b>	Community Facilities and Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Promote neighborhood equity
	<b>Needs Addressed</b>	Equity and economic mobility
	<b>Funding</b>	CDBG: \$158,019 City Housing Levy: \$2,076,393
	<b>Description</b>	Continuing and new community/public facilities projects, including childcare development and preservation.
	<b>Target Date</b>	6/30/2023

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 250 households - all low-income - are estimated to benefit from these activities.
	<b>Location Description</b>	Scattered sites.
	<b>Planned Activities</b>	Support for improvements and acquisitions of community facilities, including predominantly childcare facilities serving low- and moderate income households, and special needs individuals and households.
<b>9</b>	<b>Project Name</b>	Planning and Management
	<b>Target Area</b>	
	<b>Goals Supported</b>	Coordinate and improve delivery of services
	<b>Needs Addressed</b>	Education and outreach on housing issues
	<b>Funding</b>	CDBG: \$209,389 HOME: \$81,205 City Housing Levy: \$480,000
	<b>Description</b>	Planning, management and administration of the City of Bellingham Housing and Services Programs, including the CDBG and HOME program.
	<b>Target Date</b>	6/30/2023
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A – Planning & management activity
	<b>Location Description</b>	Throughout Bellingham - Planning & management activity.
	<b>Planned Activities</b>	Planning & management activities for the City's Housing and Services programs, including CDBG and HOME.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

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**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 8 - 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)

#### Introduction

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	709
Special-Needs	6
Total	1,323

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	1,123
The Production of New Units	26
Rehab of Existing Units	27
Acquisition of Existing Units	147
Total	1,323

**Table 10 - 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. The City's SLFRF ARPA funding has enabled substantially more investment in affordable housing than would otherwise be possible.



## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

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.

### **Actions planned during the next year to address the needs to public housing**

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.

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.

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

### **Introduction**

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.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

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.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

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 (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

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, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

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-incomes 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.

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

### **Introduction:**

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 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 it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

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.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

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 landlords, lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities disproportionately under-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.

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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(I)(1,2,4)

#### Introduction:

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(I)(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
<b>Total Program Income:</b>	<b>0</b>

#### 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.	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.



## Attachments

## Citizen Participation Comments



**Community Development  
Division  
210 Lottie Street**

**NOTICE OF PUBLIC HEARING and  
COMMENT PERIOD**

Notice is hereby given that the COMMUNITY DEVELOPMENT ADVISORY BOARD will hold a public hearing on THURSDAY, March 10, 2022 as part of its regular meeting that begins at 6 pm via online Zoom – Meeting ID: 886 9045 9994 / Password: 21.

The purpose of the public hearing is to take public comment on the draft 2022 Action Plan, which describes activities for 2022 (beginning on July 1<sup>st</sup>) which will be based on the proposed strategies and goals in the 2018-2022 Consolidated Plan.

The City seeks public comment on the draft on the 2022 Action Plan, which will be available for review online at <https://www.cob.org/services/housing/Pages/action-plan.aspx> beginning on February 22, 2022. This is the 6<sup>th</sup> year's action plan to implement the 2018-2022 Consolidated Plan, which coordinates all elements of community development benefiting low-income households – housing, neighborhood development, human services, and special projects – in a unified vision for community actions.

Comments will be accepted at the public hearing, or in writing through close of business March 26, 2022. Written comments should be sent to the Community Development Division, 210 Lottie Street, Bellingham, WA 98225 or emailed to [cd@cob.org](mailto:cd@cob.org). For additional information, contact Samya Lutz, Housing & Services Program Manager at 360-778-8385.

*The City of Bellingham does not discriminate on the basis of race, color, national origin, sex, religion, age, families with children, and disability in employment or the provision of services. Please contact 360-778-8300 if you need special assistance at the meeting. Refer any inquiries or complaints related to HUD regulations implementing Section 504 to the Housing & Services Program Manager. Contact 778-8385 (voice) or 711 (TTY - WA State Relay).*



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**Comments will be accepted at the public hearing, or in writing through close of business March 25, 2022.** Written comments should be sent to the Community Development Division, 210 Lottie Street, Bellingham, WA 98225 or emailed to [cd@cob.org](mailto:cd@cob.org). For additional information, contact Samya Lutz, Housing & Services Program Manager at 360-778-8385.

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## Grantee Unique Appendices



# HOMEBUYER

## RESALE AND RECAPTURE POLICIES

The City of Bellingham provides financial assistance to low-income homebuyers and homeowners. The source of the financial assistance is federal HOME and CDBG funds allocated to the City, as well as Housing Levy funds approved by voters. City financial assistance for homebuyer activities could include Levy, HOME and CDBG funding.

Participating Jurisdictions (PJs) undertaking HOME-assisted homebuyer activities, including any projects funded with HOME Program Income (PI), must establish written resale and/or recapture provisions that comply with HOME statutory and regulatory requirements, specifically the provisions in 24 CFR 92.254, and further articulated in CPD Notice 12-003. These provisions must also be set forth in the PJ's Consolidated Plan. The written resale and/or recapture provisions that a PJ submits in its annual Action Plan must clearly describe the terms of the resale and/or recapture provisions, the specific circumstances under which these provisions will be used (if more than one set of provisions is described), and how the PJ will enforce the provisions for HOME-funded ownership projects. HUD is required to determine whether the PJs resale or recapture requirements are appropriate and approve them in writing.

The City of Bellingham provides additional funding for homebuyer activities from the voter-approved Housing Levy. The Levy homebuyer program does not require restrictions on resale, but does provide additional financial assistance to homebuyer projects, which have resale restrictions for a period of at least 50 years.<sup>1</sup>

The purpose of this section is to provide the "resale" and "recapture" policies of the City of Bellingham. The City has four programs to assist homeowners or homebuyers:

1. First Time Homebuyer Program - down payment or closing assistance to new homebuyers. The financial assistance is a direct benefit to the homebuyer.
2. Homebuyer Development - the city provides financial assistance to a developer who sells homes to qualified low-income homebuyers.
3. CLT Homebuyer Program – assistance paying for the cost of land owned by a nonprofit Community Land Trust (CLT) associated with homes sold to low-income homebuyers. The city investment would remain in the land as subsequent sales of the home on that land continue to benefit low-income homebuyers.
4. Homeowner Rehabilitation Program - the city provides financial assistance to owners of existing homes to repair and rehabilitate their home. HOME Rules do not require continued affordability requirements associated with rehabilitation assistance to owner-occupants.

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<sup>1</sup> Non-resale restricted homes are eligible for assistance up to a maximum of \$30,000 per household, and resale restricted homes are eligible for assistance up to a maximum of \$40,000 per household.



## Resale

This option ensures that the assisted units remain affordable and occupied by a low-income household over the entire affordability period. The restrictions and affordability period are set forth in a funding agreement and restrictive covenant. Upon sale of the property by the initial homebuyer during the period of affordability, the subsequent homebuyer must be a low-income household (80% AMI or below) that will occupy the property as their principal residence. The initial homebuyer must receive a fair return on their investment.

The Resale method is used in the following cases:

1. Development Subsidy: Where HOME, CDBG or Levy funding is provided directly to a developer (including a Land Trust) to reduce development costs, thereby making the price of the home affordable to the buyer. These funds are not provided directly to the homebuyer, but are a "development subsidy" that enables the homes to be affordable to a low-income homebuyer.
2. Downpayment Assistance with Land Trust Homes: Where HOME, CDBG or Levy funding is provided to assist a homebuyer in acquiring a home, with or without rehabilitation, on land leased from a community land trust (e.g. Kulshan Community Land Trust).
3. Levy Funds with 50-year Resale: Where Levy funding is provided based on a representation that sales will be restricted to qualified low-income homebuyers for 50-years, thus making additional financial assistance from the City available.

**Enforcement of Resale Provisions.** The resale policy is enforced through the use of a Funding Agreement and Restrictive Covenant signed by the homebuyer and developer, if applicable, at closing. The Funding Agreement and Low-Income Homebuyer Covenant will specify:

1. Affordability Period. The Resale policy is enforced for the affordability period as set forth below:
  - a. If HOME funds are used, the length of the affordability period is based on the total amount of HOME funds invested in the unit (see HOME Rules). The typical affordability period for HOME-assisted homebuyer units is 10 years (\$15,000 to \$40,000 of HOME assistance per-unit).
  - b. If Levy funds are used that are subject to Resale restrictions, the affordability period is 50 years.
  - c. If CDBG funds are used, the affordability period is no less than five years, or as set forth in the Funding Agreement and Low-Income Homebuyer Covenant.
  - d. If more than one source of funds are used to assist the homebuyer, the home may be subject to multiple affordability periods. Where multiple affordability periods exist in a home, resale of the home will be restricted to the longest period set forth in the Funding Agreement and Low-Income Homebuyer Covenant.
2. Initial Homebuyer Requirement. The initial homebuyer must occupy the home as their principal residence, and no temporary or permanent sublease or rent is allowable. Principal residence means residing for more than 183 days of each year in the home.

3. Condition of Property. The homeowner must maintain the property in good repair in order to meet the minimum housing and property standards set forth in the Funding Agreement. These standards must be met at the time of resale to a qualified low-income homebuyer.
4. Subsequent Homebuyer Requirements and Reasonable Range of Low-Income Homebuyers. The home must remain affordable to a reasonable range of low-income households. The affordable price includes housing cost for mortgage principal, interest, taxes and insurance of not more than 35% of the gross monthly income for a household between 50 and 80% of the area median income for Bellingham, Washington. The initial homebuyer may not sell the home during the affordability period except to a purchaser who will occupy the home as their principal residence and whose household income is at or below eighty percent (80%) of area median income, adjusted for household size, in Bellingham, Washington. The City must be responsible for verification and qualification of the subsequent buyer's income.
5. Security. Any funds invested in housing that does not meet the affordability requirements must be repaid. The City will secure their financial interest in the affordability requirements through a Deed of Trust, Recoverable Grant Agreement and/or Promissory Note that will ensure repayment in the event that the affordability requirements are not met.

In the event of foreclosure, the City might be at risk of losing the City's financial interest in the home. If the financial investment includes HOME assistance, the City will be required to repay the funds to the HOME Investment Trust Fund Treasury account or the local account. In order to minimize the City's risk for repayment in the event of foreclosure, the City will adhere to the following policies:

- a. If the City's investment is a development subsidy, the City will require the developer to provide other suitable security or assurance that the funds will be repaid to the City.
- b. If the City's investment is to a homebuyer on property leased from a Community Land Trust, the City will require the Community Land Trust to also secure the loan with a Deed of Trust, Recoverable Grant Agreement and/or Promissory Note.

**Fair Return on Investment.** Homeowners which sell City-assisted housing are provided a fair return on their investment, while ensuring that the home is sold to another income qualified household.

The fair return is calculated as follows. The homeowner that sells their home may receive their original contribution (down payment plus principal paid down on their first mortgage) from sale proceeds, plus the value of any credit-eligible improvements paid by the homeowner minus the value of any significant deferred maintenance or damage. The calculation is further described below:

1. Cash downpayment. The amount of cash paid by the homebuyer to acquire the property in excess of closing costs. In the event the borrower borrows funds for closing cost, this may be a negative number.
2. Amount paid to principal. The amount of cash paid by the homebuyer that is credited to principal on the mortgage(s).
3. Capital improvements. The addition of livable space (bedroom, bathroom, finished basement, finished attic space, the addition of a garage (either attached or detached)) shall be considered a Qualified Capital Improvement. In order to receive credit for a Qualified Capital Improvement

prior to commencing construction, the homebuyer must submit to the City (or leaseholder if a community land trust) detailed plans, itemization of expected costs and permits for the proposed construction. The City (or leaseholder) must agree to the scope of the proposed construction and timeline for completion, in addition to the future affordability of the improvements for subsequent resale to qualified low-income homebuyers. 50% of the cost of the qualified Capital Improvements that were agreed to in advance by the City or community land trust shall qualify as Capital Improvement Credit.

4. **Capital Systems Replacement.** For the purpose of qualifying as a Capital Systems Replacement the roof, plumbing (excluding fixtures), foundation, electrical (excluding fixtures), heating, sewer line, insulation, or windows, shall be considered Capital Systems if at least fifty percent (50%) of the Capital System is replaced and the new Capital System has an expected life-span of at least 30 (thirty) years. The addition of alternative energy production system(s) shall qualify for credit under this passage. In order to receive a credit for Capital Systems Replacement, the homeowner must consult with the City or community land trust prior to replacing a Capital System and agreement must be reached between the homeowner and City/community land trust regarding the scope and cost of the proposed replacement. The intention of this credit is to encourage and create incentives for homeowners to maintain the functionality of these systems and to increase the quality of energy efficiency, durability and ease of maintenance over time while simultaneously maintaining affordability. Provided all conditions of this paragraph and the agreement between the City/community land trust and homeowner described herein are met, the following payment schedule shall apply:

# of Years Between Capital System Replacement & Sale			
	<10 Years	Between 10 – 20 Years	More than 20 Years
% of Cost to be Credited	100%	50%	0%

Replacement of less than fifty percent (50%) of any Capital System will be considered repair and the cost of such a repair will not be eligible for credit under this section.

5. **Fair Return Multiplier.** The City will apply a multiplier of 1.5% on the total of the homeowner’s cash payments outlined in items 1-4 of this subsection. This multiplier is based on an analysis of the adjusted Washington State Employment Security Department, median hourly wage data for all industries for Whatcom County. The City monitors this data annually and analyses the changes over time; the City also compares this data to the annual adjusted averages of the Quarterly Census of Employment and Wages for Whatcom County, the HUD-based median family incomes for the Bellingham MSA, and the American Community Survey median household income for the Bellingham MSA. All of these indices have adjusted rolling averages below 1.5% (and more typically below 1%). The Washington State median hourly wage data set represents a third-party objective index. The decision to use a fixed rate multiplier based on a round-up of the rolling average of this data over time reflects the City’s desire for the multiplier to be fair, objective, consistent, transparent, and easy to calculate for the homeowner.

An Example Calculating Fair Return on Investment. The following is an example of how fair return on investment would be calculated.

Category	Description	Eligible Cost
Downpayment	The homeowner put \$2,500 towards downpayment in excess of closing costs.	\$ 2,500
Principal	Over five years, the homeowner paid \$4,500 that was credited to principal on their mortgage on the property.	\$ 4,500
Capital Improvements	The homeowner added a garage after receiving prior approval. The cost of the garage was \$15,000, and 50% of that cost was eligible as credit.	\$ 7,500
Capital Systems Replacement	The homeowner replaced the roof with 30-year roofing in the past year. The cost of the roof was \$4,750.	\$ 4,750
Multiplier	Index-based multiplier of 1.5% over the 5 years the property was owned by the initial homeowner.	\$ 1,444
<b>TOTAL FAIR RETURN ON INVESTMENT TO HOMEOWNER</b>		<b>\$ 20,694</b>

Example:

The homeowner purchased the home for \$300,000, which includes subsidies provided by the City and other affordable housing providers. The original homebuyer's primary mortgage was \$210,000, plus an additional deferred loan of \$35,000 from the City. It has been determined that the homeowner's fair return on investment is \$20,694.

In order to realize a fair return to the original homeowner, the sales prices must be at least \$230,694 (\$210,000 mortgage and \$20,694 fair return on investment). In order to ensure that the home is affordable to a reasonable range of low-income homebuyers, the City determined that the sales price would have to be between \$175,000 and \$270,000.

Sale Price	\$ 245,000
Mortgage	- 189,000
Fair Return on Investment	- 20,694
City Investment	- 35,000
<hr/>	
Additional Equity Available	\$ 306

In most homebuyer projects in Bellingham, the home is on land leased by Kulshan Community Land Trust (KCLT). KCLT works to ensure that the home remains affordable in perpetuity and stays in the land trust. KCLT's groundlease is consistent with the City's Resale Policy. Community land trust homes are an important link in the housing chain, as they provide a middle ground between renting and traditional homeownership (via the private non resale-restricted market).

The City must ensure a fair return on investment, but the homebuyer must also understand that other restrictions (including market forces) might cap how much appreciation the owner might achieve in a

5

resale of their home. The City may assist another homebuyer in purchasing the housing by allowing the existing financial assistance to be assumed, or by providing additional financial assistance to purchase the home. If the City provides additional financial assistance, a new affordability period will begin for the new homebuyer.

## Recapture

Under recapture provisions, financial assistance must be repaid if it is provided directly to the buyer or the homeowner. Upon resale the seller may sell to any willing buyer at any price. The written agreement and promissory note will disclose the net proceeds percentage if any that will be allotted to the homebuyer and what proceeds will return to the PJ. Once the funds are repaid to the PJ, the property is no longer subject to any low-income affordability restrictions. The funds returned to the PJ may then be used for other eligible activities. The Recapture method is used in the following cases:

1. **Homebuyer Loans:** Where HOME, CDBG or Levy funding is provided directly to a qualified low-income homebuyer to make the home affordable, where the home does not have additional resale restrictions through a community land trust (e.g. Kulshan Community Land Trust).
2. **Condominium Units:** Where HOME, CDBG or Levy funding is provided to a qualified low-income homebuyer purchasing a housing unit pursuant to the Condominium Act (RCW 64.34).

Recapture provision will be enforced by a written funding agreement signed by the homebuyer and the City and/or intermediary as well as a recorded Deed of Trust that is the security instrument for the subordinate loan promissory note.

The recapture model that applies is "Recapture entire amount". This model recaptures the entire amount of the City's investment into making the home affordable to the homebuyer. The amount recaptured cannot exceed the net proceeds of the sale, if any. The amount to be recaptured includes outstanding principal, plus any interest owed (if any), on the City's financial assistance. The principal amount subject to recapture is only the direct subsidy benefitting the homebuyer, which is the loan of HOME, CDBG or Levy funds to the homebuyer.

**Net Proceeds Calculation.** Net proceeds are the sales price minus superior loan payment (other than City funds) and any closing costs. The sale must be to a bona fide third party unless a value is determined by an appraisal satisfactory to the City, or the property was purchased through condemnation proceedings.

**An Example Calculating Recapture.** The following two examples compare the amount to be recaptured by the City based on Net Proceeds.

	Scenario 1	Scenario 2
Sale Price	\$ 225,000	\$ 225,000
less superior debt	- 144,500	- 185,000
less closing costs	- 7,000	- 7,000
less City debt	- 35,000	- 35,000
Net Proceeds to Owner	\$ 38,500	-\$ 2,000
Adjusted City funds to be recaptured	0	33,000
Adjusted Net Proceeds to Owner	\$ 38,500	0

**City of Bellingham**  
Home Sales - Market Analysis (2021)

**All Single Family Sales**

Statistics 2021 (Jan - Dec)	
Number of Sales	1270
Total Value	\$768,978,969
Minimum Value	\$ 165,000
Maximum Value	\$ 7,310,000
Mean Value	\$ 605,495
Median Value	\$ 545,000
<b>95% of Median Value</b>	<b>\$ 517,750</b>

**Single Family Sales Only (No Condos)**

Statistics 2021 (Jan - Dec)	
Number of Sales	947
Total Value	\$635,638,881
Minimum Value	\$ 165,000
Maximum Value	\$ 7,310,000
Mean Value	\$ 671,213
Median Value	\$ 590,000
<b>95% of Median Value</b>	<b>\$ 560,500</b>

**Condo Only Sales**

Statistics 2021 (Jan - Dec)	
Number of Sales	323
Total Value	\$133,340,088
Minimum Value	\$ 173,000
Maximum Value	\$ 2,000,000
Mean Value	\$ 412,818
Median Value	\$ 361,000
<b>95% of Median Value</b>	<b>\$ 342,950</b>

**All 2-Unit Sales**

Statistics 2021 (Jan - Dec)	
Number of Sales	49
Total Value	\$32,437,943
Minimum Value	\$ 318,000
Maximum Value	\$ 1,550,000
Mean Value	\$ 661,999
Median Value	\$ 647,000
<b>95% of Median Value</b>	<b>\$ 614,650</b>

**All 3-Unit Sales**

Statistics 2021 (Jan - Dec)	
Number of Sales	3
Total Value	\$2,670,000
Minimum Value	\$ 710,000
Maximum Value	\$ 1,185,000
Mean Value	\$ 890,000
Median Value	\$ 775,000
<b>95% of Median Value</b>	<b>\$ 736,250</b>

**All 4-Unit Sales**

Statistics 2021 (Jan - Dec)	
Number of Sales	12
Total Value	\$12,550,100
Minimum Value	\$ 648,000
Maximum Value	\$ 1,975,000
Mean Value	\$ 1,045,842
Median Value	\$ 1,050,000
<b>95% of Median Value</b>	<b>\$ 997,500</b>

Sales are within City of Bellingham City Limits from Jan 2021 through Dec 2021

Data obtained from Whatcom County Assessor Sales Data. "Qualified" sales only (3WD only), no Quir Claims or mobile homes included)

Median value as determined by HUD/CFR Regulations (To determine the median, take the middle sale on the list if an odd number of sales, and if an even number, take the higher of the middle numbers and consider it the median. After identifying the median sales price, the amount should be multiplied by 0.95 to determine the 95 percent of the median area purchase price.)

**City of Bellingham**  
Home Sales - Market Analysis (2021)

**Single Family Sales By Bedroom Count (No Condos)**

Statistics 2021 (Jan - Dec)				
	1-2 Bedroom	3 Bedroom	4+ Bedroom	Total
Number of Sales	204	525	218	947
Total Value	\$115,172,050	\$339,464,260	\$181,002,571	\$635,638,881
Minimum Value	\$ 197,132	\$ 211,000	\$ 165,000	\$ 165,000
Maximum Value	\$ 7,310,000	\$ 1,605,475	\$ 2,500,000	\$ 7,310,000
Mean Value	\$ 564,569	\$ 646,599	\$ 830,287	\$ 671,213
Median Value	\$ 490,000	\$ 586,500	\$ 730,000	\$ 590,000
<b>95% of Median Value</b>	<b>\$ 465,500</b>	<b>\$ 557,175</b>	<b>\$ 693,500</b>	<b>\$ 560,500</b>



**City of Bellingham - 2022 Rental Market Study & Rent Payment Standard  
for October 1, 2022 - Sept 30, 2023**

	<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>
Rent*	\$ 1,536	\$ 1,443	\$ 1,850	\$ 2,445
Utility allowance**	\$ 52	\$ 58	\$ 74	\$ 127
Est. Payment Standard	\$ 1,588	\$ 1,501	\$ 1,924	\$ 2,572
<b>Adjusted Payment Standard***</b>	<b>\$ 1,351</b>	<b>\$ 1,431</b>	<b>\$ 1,762</b>	<b>\$ 2,504</b>

\* based on median rent of all available units during 30 day period beginning 7/29/2022, with highest and lowest and highest priced units (outliers) removed

\*\* based on Bellingham Housing Authority energy efficient, all electric unit in a complex of 4 units or more (see Utility Rates worksheet). NOTE: utilities are not included in calculations below

\*\*\* due to the anomaly of studio apartments renting for more than 1-bedroom apartments, the City is choosing to base its 2022-23 Payment Standard on 130% of HUD's 2023 FMR as they correlate closely with the analysis results

\*\*\* published here: <https://www.huduser.gov/portal/datasets/fmr.html#2023>

**HUD Final FY 2022 FMRs By Unit Bedrooms\*\*\*\***

<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>
\$926	\$996	\$1,254	\$1,781

**HUD Final FY 2023 FMRs By Unit Bedrooms\*\*\*\***

<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>
\$1,039	\$1,101	\$1,355	\$1,926

## Grantee SF-424's and Certification(s)

### CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** – The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** – To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** – It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Title

  
\_\_\_\_\_  
Date

# HOME

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/20/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042) Washington, DC 20503

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

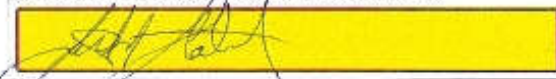
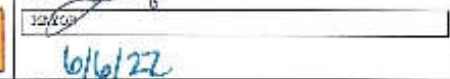
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-362) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107) which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-615), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 474D (Rev. 7-87)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-546) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are financed in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Code and Act (40 U.S.C. §276c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-335) regarding labor standards for federally-assisted construction agreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11614; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11690; (d) evaluation of flood hazards in floodplains in accordance with EO 11588; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1966, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-203).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §61271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470; EO 11663 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, 'Audits of States, Local Governments, and Non-Profit Organizations.'
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF BENTONVILLE, ARIZONA	6/6/22

SF-424D (Rev. 7-97) Back

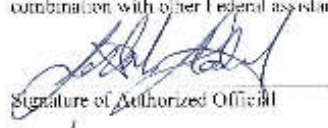
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature of Authorized Official

6/6/22  
\_\_\_\_\_  
Date

MAYOR  
\_\_\_\_\_  
Title

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> * If System, select appropriate letter(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* 3. Date Received:</b> <input type="text"/>		
<b>4. Applicant Identifier:</b> <input type="text"/>		
<b>5a. Federal Entry Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> <input type="text" value="CITY OF BELLINGHAM"/>		
<b>* b. Employer/Agency Identification Number (EIN/TIN):</b> <input type="text" value="91-000-229"/>		<b>* c. UE:</b> <input type="text" value="KAC16M4064"/>
<b>d. Address:</b>		
<b>* Street1:</b> <input type="text" value="210 11TH ST SW"/>		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> <input type="text" value="BELLINGHAM"/>		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> <input type="text" value="WA: Washington"/>		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> <input type="text" value="USA: UNITED STATES"/>		
<b>* Zip / Postal Code:</b> <input type="text" value="98225-4009"/>		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> <input type="text" value="PLANNING &amp; COMM DEVELOPMENT"/>		<b>Division Name:</b> <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> <input type="text"/> <b>* First Name:</b> <input type="text" value="DANIEL"/>		
<b>Middle Name:</b> <input type="text"/>		
<b>* Last Name:</b> <input type="text" value="LUTS"/>		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> <input type="text" value="HOUSING &amp; SERVICES PROGRAM MANAGER"/>		
<b>Organizational Attention:</b> <input type="text"/>		
<b>* Telephone Number:</b> <input type="text" value="360-773-8380"/>		<b>Fax Number:</b> <input type="text"/>
<b>* Email:</b> <input type="text" value="SLELVTCROCB.059"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="C1 City or Township Government"/>	
<p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="US DEPT OF HOUSING AND URBAN DEVELOPMENT"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text"/>	
<p>CFDA Title:</p> <input type="text"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="14.030"/>	
<p>* Title:</p> <input type="text" value="HOME INVESTMENT PARTNERSHIP ANNUAL PROGRAM"/>	
<p>13. Competition Identification Number:</p> <input type="text"/>	
<p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/>	
<p style="text-align: right;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	
<p>* 16. Descriptive Title of Applicant's Project:</p> <input type="text" value="HOME INVESTMENT PARTNERSHIP ANNUAL PROGRAM - RECEIVE, ALLOCATE AND MONITOR HOME FINDS USED IN SUPPORT OF AFFORDABLE HOUSING AND TENANT-BASED RENTAL ASSISTANCE"/>	
<p>Attach supporting documents as specified in agency instructions:</p> <p style="text-align: right;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	



**Application for Federal Assistance SF-424**

16. Congressional Districts Of:

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:  \* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="672,057.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="140,000.00"/>
* g. TOTAL	<input type="text" value="812,057.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes", provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications\*" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

\*\* I AGREE

\* The list of certifications and assurances, or an internet site where you may obtain the list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:


\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:



CD136

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4140-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in the application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 600 Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-516), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 ad-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. § 57501-1926 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a-276a-7), the Copeland Act (40 U.S.C. §276c and 16 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-335) regarding labor standards for federally-assisted construction engagements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-203).
16. Will comply with the Wild and Scenic Rivers Act of 1958 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assisting compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§466a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF SELEMBAY, WEST VIRGINIA	12/16/22

SF-4240 (Rev. 7-97) Back

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifics both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see **Optional CDBG Certification**).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2020, 2021, 2022 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

6/6/22  
Date

Maze  
Title

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>B. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="CITY OF BELLINGHAM"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="5-400-229"/>	* c. UEI: <input type="text" value="J7542PJKTA059"/>	
* d. Address:		
* Street1: <input type="text" value="210 COPPIN STREET"/>	Street2: <input type="text"/>	
* City: <input type="text" value="BELLINGHAM"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="WA Washington"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="98225 4009"/>	
* e. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
* f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="JAMES"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="FACTS"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="PUBLIC &amp; SERVICES PROGRAM MANAGER"/>	
Organizational Address: <input type="text"/>		
* Telephone Number: <input type="text" value="360-778-8385"/>	Fax Number: <input type="text"/>	
* Email: <input type="text" value="BELLINGHAM@056"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="US DEPT OF HOUSING AND URBAN DEVELOPMENT"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text"/>	
CFDA Title: <input type="text"/>	
* 12. Funding Opportunity Number: <input type="text" value="14.218"/>	
* Title: <input type="text" value="COMMUNITY DEVELOPMENT BLOCK GRANT"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="CORE MISCUAL PROGRAM - PLANNING/MANAGEMENT AND TECHNICAL ASSISTANCE, PUBLIC SERVICES, HOUSING FEEDS, PUBLIC FACILITIES, AND SPECIAL PROJECTS"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: WA-002	* b. Program/Project: WA-002
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 07/01/2022	* b. End Date: 06/30/2023
18. Estimated Funding (\$):	
* a. Federal	596,947.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	210,000.00
* g. TOTAL:	1,046,947.00
* 19. Is Application Subject to Review By State Under Executive Order 12872 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12872 Process for review on: <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12872.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix:	* First Name: BECK
Middle Name:	
* Last Name: FLEETWOOD	
Suffix:	
* Title: DIRECTOR	
* Telephone Number: 360-578-6000	* Fax Number:
* Email: MAYOR@FLEETWOOD.WA.GOV	
* Signature of Authorized Representative:	* Date Signed: 8/9/22

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.