



2023 – 2027 CONSOLIDATED PLAN

CITY OF BELLINGHAM, WASHINGTON

(covering the period from July 1, 2023 – June 30, 2028)

Final Version for HUD Submission

May 15, 2023

This version of the Bellingham Consolidated Plan uses the questions and tables required by HUD's Integrated Disbursement and Information System (IDIS). For a more succinct summary, please view the draft Consolidated Plan Overview, published simultaneously, and available in the same locations as this version (online, at the Planning Department, and in the Bellingham Public Library). Please contact the Community Development Division, Department of Planning & Community Development, at cd@cob.org with any questions or comments, or visit <https://cob.org/services/planning/consolidated-planservices/planning/consolidated-plan>.

Executive Summary

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

1. Introduction

The City of Bellingham (the City) remains a desirable community to live in and has seen population increase over the past five years at a rate that is steady, and in line with regional growth. As such, demand for housing – especially housing that is affordable to residents earning under the median income – is high. Local data suggests that rents have risen 41% in the past five years, and home prices have risen by 52%. Lack of housing keeps many people in housing that is too expensive, known as housing cost burden. Overall, 39% of all households are cost burdened. Cost burden is especially common among renters; 56% of renters in Bellingham are cost burdened, compared to 24% of homeowners.

High rents and cost burden compound other social problems, making it more difficult for households to pay for necessities such as transportation, food, and medical bills. The community has seen an increase in the need for services that are complimentary to housing stability, such as domestic violence, mental health, substance abuse and housing case management supports.

The previous Consolidated Plan called out poverty among seniors and families with children as a major concern. Unfortunately, we have seen this trend intensify and – as the most extreme outcome – a significant increase in the number of disabled seniors and families with children who are becoming homeless. In 2022, 320 homeless families with children applied for services from the Homeless Service Center, which is a 71% increase from 2018. Similarly, senior households over age 60 increased from 90 applicants in 2018 to 155 in 2022 (a 72% increase). Domestic violence is also a major contributor to family homelessness. During just one year (2022), the number of households fleeing domestic violence increased from 44 in January to 190 in December. In early 2023, a full 27% of the homeless households who had applied for services were fleeing domestic violence.

With these trends in mind, affordable housing and human services are especially needed for:

- Homeless households, with a priority to those who are most vulnerable, including families with children
- People who are medically fragile
- Seniors on fixed incomes
- Victims of domestic violence
- Families with children at risk of losing their housing

In addition to those who simply cannot afford a suitable place to live within their budget, a separate but important trend is that the number of households who also require intense case management and other behavioral support services to access and maintain permanent housing. These households often have

multiple complicated challenges such as mental health disability, substance use disorder, domestic violence, history of eviction, or other barriers to housing and employment. Those with special needs require more than just an affordable home to remain stable; waitlists for case management supports and permanent supported housing environments are long, and the social service community cannot meet the present need.

Based on the information gathered from available data sources and public feedback received to date, the following goals are recommended for the 2023-2017 planning period:

- 1) Reduce housing cost burden for low- and moderate-income households
- 2) Provide vulnerable households with services to remain stably housed
- 3) Help vulnerable households to meet their basic needs
- 4) Increase safety for unhoused vulnerable populations
- 5) Prevent housing discrimination and increase protections for low-income renters

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Bellingham's economy is strong, incomes have risen, and the city offers equitable public services and amenities available to all residents. However, this has not translated to housing stability for our lower income residents. The highest priority needs in the City of Bellingham are for affordable housing, housing services, basic needs (i.e., food, hygiene, social connection), safe shelter, and Fair Housing education and enforcement.

Affordable housing and human services are especially needed for the following populations:

- Families with children, especially single-parent families
- Homeless individuals and families with children
- People who are dealing with disability, mental health, or addiction
- People who are medically fragile
- Seniors on fixed incomes
- Victims of domestic violence

3. Evaluation of past performance

Looking back at prior Consolidated Annual Performance and Evaluation Reports, Bellingham has generally done well with the numeric goals the City has set for itself, especially when it comes to program areas that can be broadly supported by local funds as well as federal funds. Supportive services

have delivered housing and basic needs supports that have touched over 40,000 individuals since the 2018 Consolidated Plan began. The City has supported six acquisition and/or acquisition/rehab projects adding supportive housing that serves up to 43 individuals at any given time for those with developmental disabilities, recovery needs, mental or physical health needs, or for those who are underage youth or homeless-upon-entry.

The City has also supported the acquisition and/or new development of affordable housing units in 9 different projects, with 5 of those adding 316 units to the City's affordable housing inventory to date, and 4 more in development reflecting another 238 units to come. The preservation program continues to serve many very low-income homeowner households through the home rehabilitation program and the manufactured home repair program (both serving about a dozen households per year). The City has been slower to add community facilities (supporting one neighborhood resource center, and one group home in recent years), and homeownership opportunities (supporting 29 new or resale units). Regardless of how well the local efforts have succeeded in meeting goals, the needs far surpass the ability and resources available to meet them, and the gaps between local wages and the costs of housing and other essential needs continue to demand more dollars per service unit, making similar dollar amounts stretch less far over time.

4. Summary of citizen participation process and consultation process

Bellingham has a Community Participation Plan that guides the process of engaging with the public in all the HUD-related planning and reporting efforts. The citizen participation process for this Consolidated Plan began in February 2022, in tandem with the initiation of the Assessment of Fair Housing update. Numerous methods were used to solicit feedback from both the community at large and from targeted groups, including surveys, focus groups, and workshops. The Community Participation Plan is available at [Community Participation Plan \(cob.org\)](https://www.bellinghamcoba.org/).

The guiding principles for this community participation process included:

- Meet people where they are; prioritize going out to community events as opposed to asking residents to come to city-sponsored events.
- Coordinate with other City departments whenever possible, to maximize our outreach opportunities and avoid survey fatigue.
- Compensate low-income residents for their time.
- Ensure multiple language accessibility; surveys were translated into Spanish and interpreters were employed at community events whenever needed.
- Prioritize quality data instead of quantity of responses. More time was spent doing focus groups and in-person engagements and targeting low- and moderate-income residents and those with special needs.
- Outreach was iterative and accumulative. Data from early surveys and engagements was used to assess which demographics groups were underrepresented, and then specific targeted outreach was deployed to reach those groups.

- Engage directly with a wide variety of partner agencies and service providers who serve low-income residents. They are very aware of the community's gaps and needs.

In total, at least 1,204 community members provided feedback on the plan, either in person events or through written comments received via email, survey, or online forum. The activities and outcomes of the community participation process are described in detail in section PR-15, Citizen Participation.

The main purpose of this process was to develop the goals and priorities set forth in this Consolidated Plan, and to confirm that these goals indeed address the greatest needs as perceived by the community. Although the plan cannot respond to every specific suggestion or recommendation, generally speaking it is clear that the community has affordability and access to housing, and housing and services for vulnerable populations as the top needs. The Plan strives to carry out the public's will by addressing these needs within the constraints of the regulatory environment and available funding.

5. Summary of public comments

The City received 40 written comments, in addition to the many comments provided during in-person events and through surveys. Several individuals and organizations generally expressed appreciation for the plan and support of the goals, as well as many who gave specific recommendations. A compilation of all public comments received can be found in Appendix A. Summaries of each of the public surveys can be found in Appendix B. Some of the suggestions expressed in the written public comments are summarized below.

Housing supply and affordability:

- Rental subsidies are needed for low-income seniors on fixed incomes. The Low-Income-Housing-Tax Credit program does not ensure long-term affordability for people with fixed incomes.
- Study inclusionary zoning and other incentives for the private sector to build more affordable rental and ownership housing.
- Zoning rules need to be amended to allow more infill such as ADUs and duplex, and to allow for more smaller-scale rentals in current single-family neighborhoods.
- Streamline the permitting process and remove regulatory barriers to help the private market create greater housing supply.
- Amend the City's multi-family tax exemption program to eliminate the 8-year tax exemption for private developers that produce rental housing with no affordability requirement.
- Set a local living wage that fluctuates with the cost of housing.
- Some rental properties are not properly maintained, and the rental registration and safety inspection program is not adequately ensuring that all renters live in safe and healthy homes.

Homelessness and human services:

- More support for tiny house villages for people who are unhoused.

- Services such as mental health and substance abuse treatment should be integrated at shelters sites. There are examples of programs in other cities where this is being done.
- We need more providers of emergency shelter for people experiencing homelessness, especially non-secular options.
- Provide public restrooms and hygiene facilities available to everyone.

Equity and climate resiliency:

- Affordable housing that is resilient to climate change, and more climate emergency centers with air conditioning and air purification.
- Direct service providers should receive Fair Housing and anti-racism training, as well as landlords and property managers.
- Expand the definition of Fair Housing to include affordability and livability of housing.
- Service providers report a lack of resources for tenants who need legal help, or places to report instances of discrimination.

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

Generally, the comments or views that were not accepted in this plan were those related to services that apply broadly to the community as a whole and are not directly targeted to low-income or special needs groups. For example, many commenters mentioned the need for better public transportation and increased public safety, including increased police presence in some areas to address drug use, property damage, and other crimes. Although these are important concerns, public safety is a community-wide issue and is out of the scope of this plan.

The need for rent control was also mentioned by many commenters. Washington State law currently disallows local jurisdictions from enacting limits on rent increases or capping rents. However, the City Council has recently amended an ordinance which extends the amount of time a property owner must give a tenant notice before raising rent from 60 to 120 days.

A few commenters also expressed the opinion that the local government should do less to help people who are unhoused or otherwise need assistance. Since the purpose of these HUD and other local funds are explicitly allocated to address such issues and are a priority for many members of the community, these comments were not accepted.

7. Summary

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities 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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Consolidated Plan Public Contact Information

Kate Bartholomew, Community Development Specialist

kebartholomew@cob.org

360-778-8353

Samya Lutz, Housing & Services Program Manager

slklutz@cob.org

360-778-8353

Department of Planning & Community Development

City Hall

210 Lottie Street

Bellingham, WA 98225

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The city consulted with community housing and service providers, during the development of the Consolidated Plan through longstanding engagement with other housing, social services, and community focused entities. Staff also conducted targeted outreach to specific community groups for relevant sections of this plan.

These include:

- **Healthy Whatcom** – Healthy Whatcom is the name of the current Community Health Improvement Plan, coordinated by the Whatcom County department of Health & Community Services and PeaceHealth, which have conducted a multi-year analysis, prioritization, and evaluation process to select goals and address key determinants of health in Whatcom County. One of the three priorities chosen was “increasing stability through housing for families and children.” City staff have been involved throughout this process, sitting on housing-related committees, and assisting with several workshops.
- **Aging Well Whatcom** – convened by the Chuckanut Health Foundation, Aging Well Whatcom is an initiative aimed at addressing the needs of older residents in Whatcom County. City staff have partnered with Aging Well Whatcom on community education and outreach events and giving feedback on the Aging Well Whatcom Blueprint and subsequent update. The blueprint has a strong focus on housing for seniors.
- **The Whatcom Housing Alliance** – The City is a founding member of the Whatcom Housing Alliance (WHA), an organization of non-profit, government, and for-profit agencies and businesses that have a shared mission to create opportunities for more diverse housing choices in all neighborhoods that will contribute toward equitable, prosperous, healthy, and vibrant communities for everyone. The city has a position on the steering committee, which meets monthly. The WHA has over 40 member organizations, and coordinates community education and outreach events related to housing, such as Whatcom Housing Week (each October) and the Bellingham For Everyone Learning Series (bi-monthly).
- **Whatcom Landlords & Housing Professionals** – A group of housing professionals that work with low-income residents came together in 2022 to form the Whatcom Landlords & Housing Professionals network, with the intention to work collaboratively with local landlords, property managers, property owners and affordable housing professionals to address the rental housing crisis. This group is made up of representatives from the Bellingham/Whatcom County Housing Authority, City Bellingham, Lydia Place, the Opportunity Council, Northwest Youth Services and Western Washington University.
- **Agencies serving Families with Children** – In 2022, reports of families experiencing homelessness increased dramatically. The increased reliance on and duration of motel stays to

accommodate these families led the City of Bellingham to convene experts from Lydia Place, Whatcom County and the Opportunity Council to define the problem and begin developing solutions - a Families with Children response strategy. The City and WHCS convened a workshop of approximately 40 stakeholders on January 25, 2023, to review the draft strategy and provide feedback. Workshop attendees included representatives from Whatcom County Health & Community Services, Lydia Place, Opportunity Council, DVSAS, Interfaith Coalition, Bellingham School District, local foundations, and other stakeholders.

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 City partners with the County to operate several behavioral health response programs. The Ground-level Response and Coordinated Engagement (GRACE) program was developed to address the needs those who frequently use police, fire, hospital, jail, and emergency services. The Bellingham Police Department’s Behavioral Health Officer and the Fire Department’s Community Paramedics work with the Whatcom County Health & Community Services (WCHCS) department’s caseworkers to provide intensive case management and coordination of services for people once they become a GRACE member. GRACE Intensive Case Managers work in a team, drawing from the services provided by over two dozen community partners.

The County’s Law Enforcement Assisted Diversion (LEAD) program is a community-based effort to find solutions for individuals who are high utilizers of criminal justice systems. The aim is to lead people out of the criminal justice system and into intensive case management where those who are dealing with behavioral health issues can have their needs met appropriately. LEAD works with people with multiple low-level criminal offences who are experiencing hardships such as mental illness, drug use, and extreme poverty. The City’s Police Department collaborates in implementation of this program.

In 2023, the City and the County launched the Alternative Response Team (ART) to respond to certain emergency calls as an alternative to those 911 calls going to law enforcement. ART is also housed under WCHSC and is a response for community members experiencing behavioral health crisis.

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. Both the City and County fund the Whatcom Homeless Service Center, which administers the Coordinated Entry / HMIS system for the community.

Representatives from the City sit on several committees, focused together on addressing homelessness. This includes the Whatcom County Housing Advisory Committee and the Whatcom County Coalition to End Homelessness.

City and County staff meet every other week to address community needs and collaborate and strategize on funding those needs – the City and County have different funding sources. For example, the County has a behavioral health fund while the City’s sources are primarily focused on housing and housing services. In 2022, recognizing the growing number of families with children experiencing homelessness, the City increased its capital contribution to Mercy Housing Northwest’s Trailview project to the agency could lease more housing units to families currently staying in shelter. Meanwhile, the County contract with Mercy Housing so they could hire a case manager to support those families entering permanent affordable housing.

In addition, the City convened a group of service providers focused on families with children to develop a strategy for addressing this emergent need. With support from a local foundation, the City engaged a consultant to do a feasibility study of a shelter spaced dedicated to families with children, and worked with relevant stakeholders to prioritize strategies to address the needs of families with children that should be incorporated into the Consolidated Plan. A workgroup met regularly during 2021-2022 to develop strategy recommendations, which were then presented to a workshop in January 2023 (see below).

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

The City also regularly consults with the WHCS as the lead agency for the local continuum of care. City representatives participate in County advisory committees that make recommendations and provide input on fund allocation, performance standards, and evaluation of outcomes. WHCS also works very closely with the Homeless Service Center managed by the Opportunity Council to manage the HMIS system. The City requires agencies funded for homeless housing and homeless housing services to participate in HMIS and coordinated entry, and regularly coordinates with WHCS about the agencies which are mutually funded. The City’s investment in services funding for those experiencing chronic homelessness has increased over the past five years due to inadequate funding available from the county.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	OPPORTUNITY COUNCIL
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization provided data from the Housing Pool which was analyzed for the Homeless Needs Assessment. As a result, the city could clearly see trends and outcomes had changed since previous Consolidated Plan period. Org representatives also participated in public processes, families with children workgroup, and Community Development Advisory Board, providing feedback and review throughout Consolidated Plan development process.
2	Agency/Group/Organization	BELLINGHAM HOUSING AUTHORITY
	Agency/Group/Organization Type	PHA

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Data was provided by the BHA on number and condition of units, number of vouchers, project-based vouchers, and waitlists. This data was critical to the housing needs assessment. The BHA also has a representation on the Community Development Advisory Board providing feedback and review throughout Consolidated Plan development process.
3	Agency/Group/Organization	LYDIA PLACE
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Key participant in the families with children strategy workgroup, helped to develop the goals and strategies for addressing homelessness among families with children, and presented at the community workshop.
4	Agency/Group/Organization	Domestic Violence & Sexual Assault Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Victims of Domestic Violence Services-homeless

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children
How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Provided data and context for the needs around families with children and needs of homeless households fleeing domestic violence.

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 Department of Health & Community Services	The Strategic Plan to End Homelessness is updated periodically and is our regional blueprint for addressing homelessness. Many of the strategies in this plan are overlapping; both share a focus on increasing the supply of affordable housing, prevention and diversion whenever possible, and adding more permanent supportive housing for those with higher needs.
Community Health Improvement Plan (CHIP)	Whatcom County Department of Health & Community Services; Peace Health	One of the three main strategies identified in the CHIP is increasing stability through housing for families and children, a key component of this plan.
Aging Well Whatcom Blueprint	Chuckanut Health Foundation	Housing is one of the six focus areas for which the blueprint identifies recommendations for older adults and their families.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The city coordinated with the Office of Emergency Management (OEM) on the Hazard Mitigation portion of the plan, and the Port of Bellingham on the Non-Housing Community Development assets. We coordinate regularly with these agencies on areas where their expertise is needed to implement

portions of our plan, such as business development or disaster preparedness for low-income and vulnerable groups.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

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

The City's Community Participation Plan[1] encompasses both the Assessment of Fair Housing and Consolidated Planning process. As such, many early outreach efforts focused primarily on Fair Housing also served as venues to discuss topics relevant to the Consolidated Plan. Considering that the Consolidated Plan is meant to address the needs of low-income residents and improve the quality of life in low-income areas, a significant effort was made to primarily sample residents who receive housing assistance or other services for special needs households, or professionals who work with these households.

In-person listening sessions, focus groups, or meetings were held at the following locations:

- Washington Square (Whatcom/Bellingham Housing Authority)
- Villa Santa Fe (Catholic Community Services)
- Sterling Meadows (Mercy Housing Northwest)
- Max Higbee Center
- Western Washington University
- Eleanor Apartments (Mercy Housing Northwest)

Two community surveys were widely distributed, with a focus on reaching out to the target demographics. (All surveys were also translated into Spanish, which is the second most widely spoken language in Bellingham after English.) The first survey was distributed before the Consolidated Plan was drafted, in April-May of 2022, and focused on housing equity and access. The second was distributed after the draft Consolidated Plan was available for public comment, in March of 2023, and focused on gathering feedback on the goals and priorities proposed. Because survey participation was found to be under-representative renters and young adults, a third survey on a combination of these topics was released in January of 2023 and targeted college students at Western Washington University and Whatcom Community College. A summary of all surveys can be found in Appendix A.

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	Internet Outreach	Non-targeted/broad community	26 written public comments submitted through Engage Bellingham website.	A main concern among the comments posted on the website addresses access to housing. From increasing rents to fluctuating living wages, the comments point out gaps within the Bellingham housing market. Suggested solutions include adding rental units in SF areas, subsidizing building materials, addressing For-profit renting, keeping profits in-state, utilizing private-housing to support construction of more housing, taxing affordable and wealthy housing at different rates, more drug rehabilitation and detox facilities, remember low-to-middle income individuals/families who cannot receive certain services but may need support services to acquire housing, and establishing a city minimum wage linked to housing costs.		https://engage.bellingham.org/consolidated-plan

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)
2	Survey	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community Families with children	486 surveys completed.	Housing Equity Survey: 395 surveys completed. Housing Equity Survey posted through Bellingham School District newsletter: 141 surveys completed; Over 80% of respondents' household income is \$60,000 or less, and 92% of respondents identified as Hispanic. Comments summarized in Appendix A.	Responses are summarized in Appendix A.	

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)
3	Newspaper Ad	Non-targeted/broad community	Notice of public hearing posted in the Bellingham Herald on Tuesday, February 28th giving notice of in-person and virtual public hearing on March 9th, and advising how to attend or submit written comments.	No comments received.		

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)
4	Public Meeting	Residents of Public and Assisted Housing	7 attendees participated in an in-person meeting/listening session.	Residents of Bellingham Housing Authority properties Lincoln Square, Varsity Village, and Washington Square came to an in-person focus group hosted at Lincoln Square. Several residents noted that they would be homeless if it were not for services available in the community, and if they had not obtained subsidized housing. One resident was formerly homeless and mentioned the difficulty of accessing services when you do not have a physical address. In general, the trend for all kinds of applications moving to online only is a challenge for seniors and those with disabilities. One person commented that there is a step missing between the Lighthouse Mission (emergency shelter) and subsidized apartments, and that people need to learn how to live in the community. Others agreed that we need more temporary and transitional housing.	Comments related to operations, policies, or building management were compiled and shared anonymously to the Bellingham Housing Authority.	

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)
5	Public Meeting	Persons with disabilities Seniors	4 attendees participated in a virtual meeting/listening session.	A listening session was convened by Aging Well Whatcom with local housing providers and policy experts. Four seniors attended and offered a variety of suggestions and comments. In general, there was interest in more shared housing options where seniors could pool their resources and have a sense of community, while still having privacy and autonomy. Current zoning does not allow for this option in many places. Other comments centered on design with seniors in mind, such as in-unit washers and dryers, elevators, outlets placed higher off the ground, and walk-in showers. The group discussed the relationship between housing and transit, and how with more walkable access to groceries and pharmacies, parking would not be as needed. Several attendees said they would like to give up their cars, but current infrastructure does not make that possible.		

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)
6	Public Meeting	Minorities Low-income residents	48 attendees total in two meetings with residents of manufactured home parks (MHPs).	Two community meetings were given by Planning & Community Development staff to discuss potential changes to the zoning of MHPs in the city. All MHP residents were invited to the online event, with Spanish translation provided. Staff briefly explained how the Assessment of Fair Housing & Consolidated Plan relate to the needs of MHP residents and encouraged attendees to complete a survey or provide comment. Comments received were in general supportive of the city's efforts to protect MHPs from development, but unsure how residents could afford to purchase the land on fixed incomes. Other comments provided via the survey expressed that the city should offer financial assistance or other support to help park residents purchase the land on which their homes are located, as they provide affordable housing for low-income residents.		

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)
7	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Residents of Public and Assisted Housing Families with children; low-income renters	100+ attendees; 21 hardcopy surveys completed two back-to-school events at Villa Santa Fe and Sterling Meadows	Comments are summarized in Appendix A.		

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)
8	Public Meeting	Persons with disabilities	42 attendees at a "Meet the City" event at Max Higbee Center	The city coordinated with the Max Higbee Center, a day center for adults and youth with developmental disabilities, to host an event. Members and their families were invited to hear from city staff about multiple plans and provide in-person feedback about their opinions and needs. Several members provided comments about the need for more housing options for adults with developmental disabilities (DD). Some mentioned the strain of aging parents trying to secure long-term support for their adult children with DD. Some suggested a community housing model where young adults with DD could pair up with seniors and support each other and share resources. They urged more flexible zoning and creative solutions, where appropriate. For example, duplexes and housing with private rooms and shared common areas.	Other comments or questions not relevant to the Consolidated Plan could be directed to other staff from other city departments. Staff from Parks, Public Works, and Library were in attendance.	

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)
9	Survey	Professionals that work with low-income clients	20 survey responses from housing professionals (case managers, landlord liaisons, mediators, attorneys)	To gain a broader perspective, his survey targeted professionals who work with low-income renters as well as property owners. This survey focused on Fair Housing, but also included some questions around Consolidated Plan priorities. This group reported that housing discrimination is common for their clients, especially source of income discrimination. Respondents in general were wary of adding more laws and requirements for property owners, and felt the main problem is a lack of enforcement and adherence to existing laws. Some noted that housing is already a complex and heavily regulated environment, and more restrictions might have unintended consequences of making property managers even more hesitant to participate in programs that benefit low-income renters or those without a strong credit or rental history, essentially making it harder to find housing for those who are most vulnerable. Respondents suggested for more education, incentives, or recognition programs instead of more rules or penalties, which are difficult to enforce.		

Consolidated Plan

BELLINGHAM

24

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)
10	Survey	Renters and young adults	181 surveys completed. Young adults and renters were underrepresented in previous outreach efforts. This survey targeted Western Washington University & Whatcom Community College students, who were predominantly renters and under age 34.	Participants were asked about their preferred criteria for housing, levels of support the City should prioritize, to identify issues related to housing, to rank needed public facilities, and identify populations and geographic areas that need more support. For housing criteria, participants mainly prioritize cost, proximity to school, and ability to have pets when searching. The top three issues related to housing show that 86% of respondents think rents are increasing too much, about 32% identified a lack of housing options that meets needs, 24% noted the shortage of human services. Other issues mentioned include structural integrity of homes (poor conditions), and unresponsive landlords. Participants also shared ideas about which geographic areas could use improvements. Around the Cordata/Meridian & the Barkley/Sunset areas, individuals identified this could be a good place to build more housing, especially since WCC is in Cordata. Similarly, participants urged for more student housing around Sehome. In Birchwood, people asked for affordable food options or a grocery store in Hipp Valley, people identified a lack of healthcare options. Respondents asked for enforcement of necessary home renovations (rentals).	Around Samish Hill, in front of Lark Apartments, multiple people urged for a crosswalk since this street is home to many students and senior residents. In general, repair of roads and a wider bus system that connects more people from the county to Bellingham were also requested. Comments regarding geographic priorities were beyond the scope of this plan, specifically around crosswalks. These suggestions can be passed on to our transportation planners in Public Works.	

Consolidated Plan

BELLINGHAM

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)
11	Public Meeting	Renters and young adults	3 in-person focus group participants.	Comments are summarized in Appendix A.	Responses are summarized in Appendix A.	
12	Public Meeting	Persons with disabilities Residents of Public and Assisted Housing Seniors and low-income renters	25 participants attended an in-person listening session at Eleanor Apartments (operated by Mercy Housing NW)	Residents of Eleanor, a Mercy Housing property, contacted the city about continued rental increases in their subsidized units. The city staff were invited to conduct a listening session on-site with residents to share about the Consolidated Plan and hear residents' concerns. Written comments and notes from this session can be found in Appendix A.	Responses are summarized in Appendix A.	

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)
13	Survey	Non-English Speaking - Specify other language: Spanish low-income residents	223 Bellingham residents. Survey was offered online and on paper. Hardcopies of this survey were directly dropped off at the Bellingham Senior Center, Goodwill Job Training Center, and Carl Cozier Family Resource Center. The survey was available in English, Spanish, and Ukrainian.	Comments summarized in Appendix A.	Responses summarized in Appendix A.	

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)
14	Survey	Staff of organizations that serve special needs populations and low-income residents	56 respondents from agencies that offer services in Bellingham.	Comments are summarized in Appendix A.		

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)
15	Written Comments	Non-targeted/broad community	14 email or mail comments received.	Throughout the public participation process, staff also welcomed residents to submit comments directly via email, phone call, or by mail. A variety of comments, ideas, and questions were submitted on various topics related to the Consolidated Plan. All comments received are included in Appendix A: Public Comments.	Limit rent increases/rent control Response: this is currently prohibited in the state constitution, but staff are closely following statewide initiatives to moderate rent increases. Provide homeless services in the county Response: This plan is specific to the City of Bellingham and does not deal with activities outside of the city.	

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)
16	Public Hearing	Non-targeted/broad community	A public hearing on the draft 2023-2017 Consolidated Plan and 2023 Action Plan was held on March 9, 2023 at a public hearing as part of the Community Development Advisory Board meeting.	No comments received.		

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Like many other cities in our region, Bellingham has seen continued population growth and dramatically increasing housing costs over the past five years, while vacancy rates remain low. There are not enough affordable rental units or homes to purchase for low- and moderate-income residents. This is primarily a function of the fact that rents and home values have risen much faster than wages in recent years, and new construction primarily provides high-end rental units which are unaffordable to those earning below the median income. As a result, 24% of homeowners and 58% of renters in Bellingham pay more than 30% of their income for housing. This rate is higher than both the state and US averages for cost burden. The percent of cost burdened homeowners has decreased since the previous Consolidated Plan, and the percent of cost burdened renters has increased slightly.[1]

A lack of affordable housing contributes to the rise in homelessness because it makes it even more difficult for low-income residents to afford basic needs like food, healthcare, and transportation, or to save enough money for unforeseen expenses. Despite these challenges, the Whatcom County Point-in-Time count shows only a small increase in the number of persons experiencing homelessness on a given night – from 815 in 2018 to 832 in 2022 – while the percent who are unsheltered dropped from 47% to 22%. While this is positive, census count methodology changes annually, and early indicators predict that the 2023 Point-in-Time count is likely to show a sharp uptick in 2023, mainly a result of a more robust count.

Non-White and Hispanic households at some specific income levels are disproportionately cost burdened when compared to the general population and are overrepresented among people experiencing homelessness. Climate change has also increased the severity of our weather, making it more dangerous for people living unsheltered during severe cold, heat, or smoke events. This has increased the urgency to provide safe shelter for vulnerable and unhoused individuals and families.

Affordable housing and human services are especially needed for:

- Homeless individuals and families with children
- People who are dealing with disability, mental health, or addiction
- People who are medically fragile
- Families with children, especially single-parent families
- Seniors on fixed incomes
- Victims of domestic violence

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2021	% Change
Population	77,584	90,545	17%
Households	32,677	39,496	21%
Median Income	\$37,031.00	\$59,163.00	60%

Table 5 - Housing Needs Assessment Demographics

Alternate Data Source Name:

2017-2021 American Community Survey (ACS)

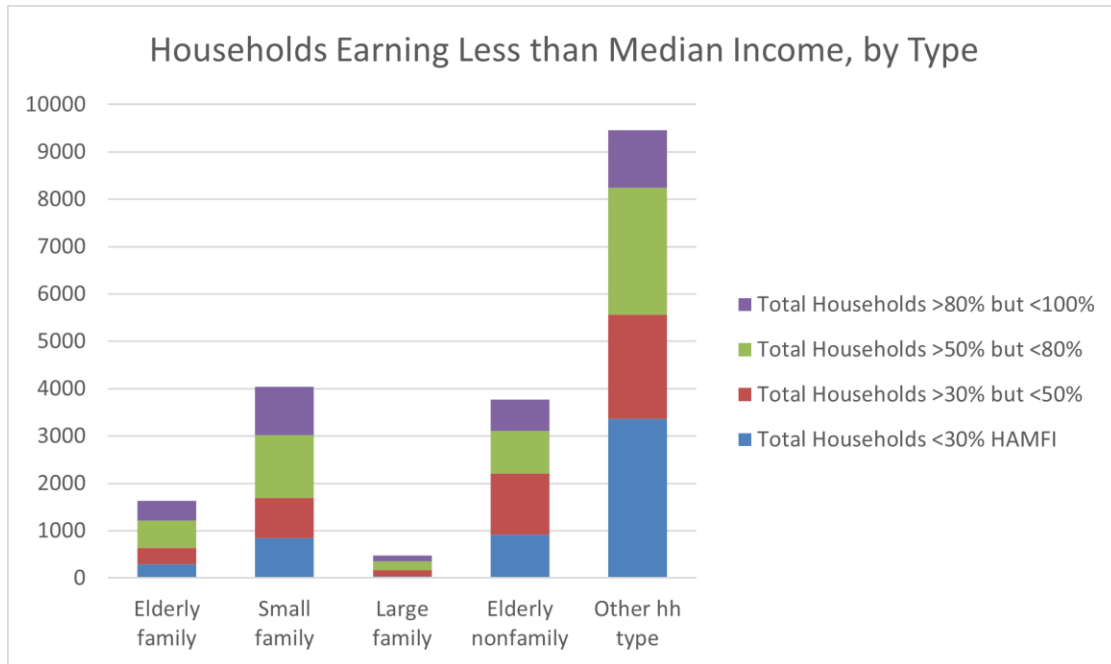
Data Source Comments:

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,155	5,000	5,975	3,510	14,660
Small Family Households	1,185	820	1,490	1,115	6,505
Large Family Households	65	175	145	140	770
Household contains at least one person 62-74 years of age	665	935	1,220	720	3,535
Household contains at least one person age 75 or older	700	840	645	665	895
Households with one or more children 6 years old or younger	505	385	565	220	1,425

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS



Households Earning < Median Income

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	200	165	110	175	650	50	0	0	45	95
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	30	20	115	40	205	0	0	0	25	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	10	95	90	275	0	25	0	0	25
Housing cost burden greater than 50% of income (and none of the above problems)	3,825	1,670	265	40	5,800	570	390	375	130	1,465
Housing cost burden greater than 30% of income (and none of the above problems)	365	1,395	1,720	365	3,845	195	375	650	280	1,500

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	360	0	0	0	360	100	0	0	0	100

Table 7 – Housing Problems Table

Data 2013-2017 CHAS

Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,140	1,865	585	340	6,930	620	415	375	200	1,610
Having none of four housing problems	645	1,810	3,285	1,685	7,425	290	910	1,730	1,285	4,215
Household has negative income, but none of the other housing problems	360	0	0	0	360	100	0	0	0	100

Table 8 – Housing Problems 2

Data 2013-2017 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	894	555	595	2,044	185	115	305	605
Large Related	50	130	35	215	15	20	55	90
Elderly	660	650	365	1,675	385	465	455	1,305

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Other	2,815	1,925	1,180	5,920	180	165	210	555
Total need by income	4,419	3,260	2,175	9,854	765	765	1,025	2,555

Table 9 – Cost Burden > 30%

Alternate Data Source Name:

2014-2018 CHAS data tabulations

Data Source

Comments:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	890	200	35	1,125	115	60	110	285
Large Related	50	100	0	150	15	20	0	35
Elderly	480	440	165	1,085	275	205	150	630
Other	2,620	1,030	135	3,785	165	105	115	385
Total need by income	4,040	1,770	335	6,145	570	390	375	1,335

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS

Source:

RENTERS

% w/Cost Burden

	Elderly family	Small family	Large family	Elderly nonfamily	Other hh type
No cost burden	55%	60%	48%	32%	40%
Cost burden >30% but <50%	21%	21%	21%	21%	25%
Cost burden >50%	23%	19%	31%	47%	36%
Total Cost burden:	44%	40%	52%	68%	60%

HOMEOWNERS

% w/Cost Burden

	Elderly family	Small family	Large family	Elderly nonfamily	Other hh type
No cost burden	81%	83%	85%	62%	65%
Cost burden >30% but <50%	12%	10%	12%	24%	19%
Cost burden >50%	7%	7%	3%	14%	15%
Total Cost burden:	19%	17%	15%	38%	35%

Percent Cost Burden: Owners vs. Renters**5. Crowding (More than one person per room)**

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	10	120	90	320	0	25	0	0	25
Multiple, unrelated family households	0	0	0	0	0	0	0	0	25	25
Other, non-family households	10	80	90	40	220	0	0	0	0	0
Total need by income	110	90	210	130	540	0	25	0	25	50

Table 11 – Crowding Information – 1/2

Data 2013-2017 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

There are 13,511 single-person households in Bellingham, representing about 34% of all households (according to the 2021 ACS 5-year estimate). The median income for 1-person households is \$35,331; a single-person household earning this income could not afford a market rate studio apartment in Bellingham, which is above \$1,400 per month. Although the exact number of cost-burdened single person households is not known, there were 227 single person households on the Bellingham Housing Authority waitlist for the Housing Choice Voucher (HCV) program and 511 single person households on the public housing waiting list. These waitlist applicants were chosen by lottery from over 600 households that applied during a 5-day period in June 2022.

In the November 2022 there were 462 single person households on the Housing Pool, a list of literally homeless households awaiting housing assistance. Although there is undoubtedly some duplication among these lists, the most vulnerable, income-qualified household type in the community is clearly single-person households.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In the 3rd quarter of 2022, the Housing Pool “over three quarters of all client heads-of-household enrolled in this quarter reported disabled status (78%). Disabled households are disproportionately represented in both poverty and homelessness.” [1] For example, of the 676 households active on the Housing Pool (i.e., waiting for a housing placement) in November 2022, in 497 (74%) the head of household had some type of disability. Of these, 368 (54%) reported having a mental health disability and 199 (29%) were medically fragile. The majority (173) of those who reported being medically fragile were unaccompanied adults.

Of the 707 households active on the Housing Pool in January 2023, 27% (194) were fleeing intimate partner violence – meaning that domestic violence was reported as a factor in them being homeless or at risk of homelessness. Even for households who are not actively fleeing domestic violence, it is a common experience. Of the 707 households, 302 reported experiencing domestic violence in the last five years.

The number of shelter beds for those fleeing domestic violence does not adequately meet the need in our county. Domestic Violence & Sexual Assault Services (DVSAS) of Whatcom County reported that 76 unique households sheltered at one of their facilities in 2022. This is a decrease in numbers sheltered before the pandemic, when 99 household were served in 2019, but the decrease is due primarily to the stays being longer, which increased from an average of 72 days in 2019 to 147 days in 2022 – over 100%

increase. This recent trend of longer stays in shelter or transitional housing is consistent with other programs that serve clients experiencing homelessness.

What are the most common housing problems?

In reviewing Table 7 above, housing cost burden is by far the most common housing problem. While there are an estimated 745 households that have substandard housing (lacking complete plumbing or kitchen), the second most common housing problem, there are nearly ten times as many households that are severely cost burdened, and another 5,345 households that are cost burdened. Housing cost burden affects more than 1 in 3 households in Bellingham and is especially prevalent among renter households. Using more recent census data[1] reveals that a full 58% of renter households are cost burdened. While cost burden has increased slightly over the past decade for renters, it has measurably decreased for homeowner households. This is across all income categories, but not surprisingly, cost burden and severe cost burden is highest among the lowest income groups.

Are any populations/household types more affected than others by these problems?

Cost burden is not distributed evenly among different household or family types. It is especially concentrated among households that rent, and non-family households. Elderly non-family renter households are the most cost burdened, with 47% of these households being severely cost burdened. This is followed by “other non-family” households, of which 36% are severely cost burdened. Large family households that rent also experience a high degree of severe cost burden, with 31% of large family households experiencing severe cost burden. See custom Table "Percent Cost Burden: Owners vs. Renters" above for a summary.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

With so many people in the community cost burdened and severely cost burdened, there is no unique set of characteristics of populations that are most at risk of homelessness. Housing costs are putting strain on households of all incomes, races, ethnicities, and family types. As discussed above, cost burden is especially concentrated among renter households earning less than 50% of the area median income. That said, local evidence suggests that families with young children, single adults, seniors, and those with chronic health conditions are especially vulnerable to homelessness.

Formerly homeless families who are nearing the end of their rapid rehousing program assistance have a range of needs. Service providers report that these primarily include permanently affordable rental units and/or rent subsidy; employment with wages that can meet of the cost of living in our area; childcare resources (including location, availability, hours, and affordability). Additionally, families may have

needs around debt and credit repair, benefits counselling (if increasing income through employment), parenting supports, domestic violence supports, transportation, and goal-setting for continued housing stability.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Through a coordinated entry system, the Whatcom Homeless Services Center use an evidence-based assessment tool, Vulnerability Index Service Prioritization Decision Assistance Tool (VI SPDAT) adopted through The National Alliance to End Homelessness. The countywide housing system identifies households for appropriate housing placements using their VI SPDAT score. Households are identified for Permanent Supportive Housing, Rapid Rehousing or Diversion interventions based on the assessment tool.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Targeted screening for prevention services is used by the Homeless Service Center. This considers factors related to instability and increased risk of homelessness, which are:

- Income (no income or extremely low income)
- Challenges to finding new housing were client to lose current housing (for example, criminal history related to housing barriers, poor credit)
- Previous episodes of homelessness
- Age of head of household (under 30 or over 65) and age of children (under 6)
- Disabilities, including physical and mental health concerns
- History of domestic violence

Discussion

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

The four housing problems monitored by HUD are complete plumbing, complete kitchen, overcrowding, and cost burden. Cost burden is defined as paying more than 30% of household income for housing (rent or mortgage, plus utilities).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,320	370	460
White	4,030	340	280
Black / African American	140	0	0
Asian	155	15	30
American Indian, Alaska Native	110	4	0
Pacific Islander	45	0	0
Hispanic	550	0	125

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,050	950	0
White	3,245	805	0
Black / African American	25	25	0
Asian	145	20	0
American Indian, Alaska Native	100	50	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	40	0	0
Hispanic	290	25	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,325	2,645	0
White	2,680	2,230	0
Black / African American	0	40	0
Asian	110	110	0
American Indian, Alaska Native	55	74	0
Pacific Islander	0	0	0
Hispanic	270	180	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,185	2,320	0
White	1,020	1,950	0
Black / African American	0	10	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	20	165	0
American Indian, Alaska Native	25	70	0
Pacific Islander	0	0	0
Hispanic	80	85	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Housing problems are not evenly distributed among race or ethnic groups. For example, 42% of renters as a whole experience housing problems. Compare that with 79% of Pacific Islander and 66% of Native American households. This is a disproportionately high number with housing problems. Looking across income groups, the lowest income groups have the greatest percent of housing problems (most especially cost burden). Eighty-five percent of households earning less than 30% of the area median income are cost burdened, and 83% of those earning between 30%-50% of the median. Only 10% of those earning above 100% of median income have housing problems, by comparison.[1]

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Severe cost-burden is defined as paying more than 50% of household income for housing. The designation of “severe” housing problems means that there is severe cost burden, more than 1.5 persons per room (severe overcrowding) and includes lack of complete plumbing or kitchen facilities.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,760	935	460
White	3,545	825	280
Black / African American	140	0	0
Asian	155	15	30
American Indian, Alaska Native	105	8	0
Pacific Islander	45	0	0
Hispanic	475	70	125

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,280	2,720	0
White	1,920	2,130	0
Black / African American	25	25	0
Asian	125	40	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	20	130	0
Pacific Islander	25	15	0
Hispanic	145	170	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	960	5,015	0
White	760	4,150	0
Black / African American	0	40	0
Asian	10	205	0
American Indian, Alaska Native	0	129	0
Pacific Islander	0	0	0
Hispanic	105	345	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	540	2,970	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	475	2,495	0
Black / African American	0	10	0
Asian	0	185	0
American Indian, Alaska Native	0	95	0
Pacific Islander	0	0	0
Hispanic	60	100	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2013-2017 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

As is the case with housing problems, severe housing problems are also more prevalent among specific income categories and racial or ethnic groups. Among households in the lowest income group (0-30% AMI), 77% of households in the jurisdiction as a whole have severe housing problems. However, 100% of African American and Pacific Islander households in this income category have severe housing problems. Native American households are also disproportionately represented, with 93% having severe housing problems.

In the 30-50% AMI income category, 46% of households in the jurisdiction as a whole have severe housing problems. Meanwhile, 76% of Asian households in this income category have severe housing problems. Pacific Islander households are also disproportionately represented, with 63% having severe housing problems.

In the 50-80% income group, just 16% of households in the jurisdiction have severe housing problems, and there is no disproportionate need. However, at the 80-100% AMI income level, 38% of Hispanic households have severe housing problems, while only 15% of households at this income level have severe problems in the jurisdiction as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

Of the housing problems, cost burden is by far the most significant in Bellingham. Cost burden in Bellingham is notably higher than both the region and the state. More recent 2021 ACS data shows that in Washington State 23% of homeowners and 46% of renters are cost burdened. Using the same data year, 24% of homeowners and 58% of renters in Bellingham are cost burdened. Renters in general have a disproportionately greater need than homeowners.

The high proportion of cost-burdened renters can be explained in part because Bellingham is a college town with a high population of young adults who are full-time students. Even so, an estimated 34% of all households are family households, and another 27% are elderly households (either family or non-family). Housing cost burden is just as problematic among the non-student population, and affects 42% of elderly nonfamily households, for example.[1]

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	20,470	6,510	7,850	460
White	17,865	5,300	6,250	280
Black / African American	125	0	175	0
Asian	950	175	270	30
American Indian, Alaska Native	245	175	110	0
Pacific Islander	0	15	70	0
Hispanic	1,025	445	595	125

Table 21 – Greater Need: Housing Cost Burdens AMI

Alternate Data Source Name:

2014-2018 CHAS data tabulations

Data Source Comments:

Housing Cost Burden	Totals		NO Cost Burden ≤30%	Cost Burden 30-50%	Severe Cost Burden >50%
Jurisdiction as a whole	35,290		58%	18%	22%
White	29,695	84.1%	60%	18%	21%
Black / African American	300	0.9%	42%	0%	58%
Asian	1,425	4.0%	67%	12%	19%
American Indian, Alaska Native	530	1.5%	46%	33%	21%
Pacific Islander	85	0.2%	0%	18%	82%
Hispanic	2,190	6.2%	47%	20%	27%

Greater Need: Housing Cost Burdens By Race/Ethnicity

Custom Table 21.5 – Disproportionately greater need by income category

CITY OF BELLINGHAM -RENTERS		PERCENT WITH HOUSING PROBLEMS				
		<30% HAMFI	>30% but <50%	>50% but <80% HAMFI	>80% but <100% HAMFI	>100% HAMFI
White, not Hispanic		88%	93%	64%	39%	9%
Black, not Hispanic		100%	42%	0%	0%	19%
Asian, not Hispanic		71%	100%	79%	40%	20%
American Indian/ Alaskan Native, not Hispanic		100%	75%	41%	0%	0%
Pacific Islander, not Hispanic		100%	100%			
Hispanic, any race		82%	94%	72%	50%	8%
All		87%	91%	64%	39%	10%

CITY OF BELLINGHAM - OWNERS		PERCENT WITH HOUSING PROBLEMS				
		<30% HAMFI	>30% but <50%	>50% but <80% HAMFI	>80% but <100% HAMFI	>100% HAMFI
White, not Hispanic		74%	61%	44%	34%	9%
Black, not Hispanic				0%		0%
Asian, not Hispanic		100%	72%	50%	18%	16%
American Indian/ Alaskan Native, not Hispanic		100%	44%	0%	100%	60%
Pacific Islander, not Hispanic			0%			
Hispanic, any race		82%	100%	77%	100%	11%
All		77%	62%	45%	36%	10%

Data source: 2014-2018 CHAS

Disproportionately greater need by income category

Discussion:

Several racial and ethnic groups have disproportionately greater needs, according to the 2013-2017 CHAS data provided. See Custom Table 21, showing the percentage of each race and ethnic group by households who are cost burdened and severely cost burdened compared to the percentage of cost burden among the total population. This analysis shows that while 22% of the total population is cost burdened, 58% of Black households and 82% of Pacific Islander households are severely cost burdened. While this is a small percentage, it is more than double the proportionate rate. Hispanic households are also somewhat higher, with 27% of the population severely cost burdened compared to 22% of the total population. Similarly, 33% of Native American households are cost burdened, compared to 18% of the total population, which is disproportionately high.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Yes. There are many cases of this, among both renter and homeowner households. For example, among renters earning less than 30% of the Household Area Median Income (HAMI), 87% of all renter households have housing problems. In that same income category, 100% of Black, Native American, and Pacific Islander households have housing problems. Among homeowners earning between 30-50% HAMI, 100% of Hispanic households have housing problems compared to only 62% of the total population in that income category. See Custom Table 21.5 above for the complete dataset. Those racial or ethnic groups with 10 percentage points or more above the total income category considered “disproportionate” are in red font.

If they have needs not identified above, what are those needs?

As discussed above, the most significant problem is cost burden, and so the most common need is more affordable housing in a range of unit types and sizes.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

During Bellingham’s Assessment of Fair Housing, no areas were identified where there was significant concentration of a single ethnic or racial group with greater housing needs. This is in part because Bellingham remains predominantly White and non-Hispanic. However, families with children and youth are far more diverse than the city as a whole, and therefore some school district data was used in addition to Census data. This data set does suggest that there are some areas of above average concentrations of non-White households in neighborhoods on the north end of the city, in neighborhoods like Meridian, Cordata, and Birchwood.[1]

NA-35 Public Housing – 91.205(b)

Introduction

The Bellingham Housing Authority owns or manages 1,533 units within the City of Bellingham. Only a portion of the units owned or managed by the Housing Authority are considered "public housing" that receives financial assistance through HUD. The Housing Authority manages Housing Choice Voucher (Section 8) programs, and other voucher and special needs housing, and most managed units utilize these. It is important to note that the numbers below are for all of Whatcom County; we estimate that typically about 60% of vouchers are used in Bellingham, which is the largest City in the jurisdiction.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	567	1,985	318	1,422	55	0	190

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Alternate Data Source Name:

BHA

Data Source Comments:

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	16,882	15,113	13,112	15,594	15,570	0
Average length of stay	0	0	7	5	4	6	4	0
Average Household size	0	0	2	2	2	2	1	0
# Homeless at admission	0	0	43	356	117	189	50	0
# of Elderly Program Participants (>62)	0	0	290	695	115	580	29	0
# of Disabled Families	0	0	381	1,072	147	925	36	0
# of Families requesting accessibility features	0	0	0	1,567	198	1,211	18	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Alternate Data Source Name:

BHA

Data Source Comments:

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	723	2,356	435	1,921	50	0	151
Black/African American	0	0	30	156	50	106	4	0	8
Asian	0	0	36	56	9	47	0	0	5
American Indian/Alaska Native	0	0	13	131	40	91	2	0	9
Pacific Islander	0	0	13	38	6	32	1	0	1
Other	0	0	56	416	100	316	0	0	29
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Alternate Data Source Name:

BHA

Data Source Comments:

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	141	520	103	417	4	0	30
Not Hispanic	0	0	730	2,633	537	2,096	53	0	173

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Alternate Data Source Name:

BHA

Data Source Comments:

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The Public Housing waiting-lists in the City of Bellingham maintained by the City's public housing authority (PHA) reflect 122 out of 643 (19%) households reporting a mobility, hearing, or sight disability. The tenant-based Housing Choice Voucher waiting-list reflect 100 out of 326 (30%) households reporting having a mobility, sight, or hearing disability. The project-based Housing Choice Voucher waiting-lists reflect 84 out of 368 (23%) households reporting a mobility, sight, or hearing disability. Among all three lists, mobility disability is the most common. There is undoubtedly duplication of individual households among these lists.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The most immediate need of Public Housing residents is more individualized support to help ensure housing is retained. In a listening session with Public Housing residents, several expressed that they would like to have more on-site liaisons or advocates available to help them troubleshoot problems and provide referrals to resources. Since the pandemic, there has been a lack of resources available to help residents maintain their homes in a manner consistent with HUD-required inspection standards. Programs once available to assist in this area are much harder to come by, putting pressure on the PHA and case managers, that already have limited capacity to assist. In addition, Whatcom County is experiencing significant challenges with substance abuse, behavioral health, homelessness, and police reforms. More than ever, PHA staff are called upon to respond and provide interventions in areas they are not trained. Federal programs operate with very little margin, making it difficult to add staffing resources, trainings, or certifications.

HUD is not expanding the Public Housing program, however the need for these units is much higher than the supply, leading to closed waitlists and long wait times for available units.

The most immediate need of voucher holders are additional subsidized units, as well as individualized support to help obtain housing. There is a severe shortage of subsidized units in our community, and voucher holders often struggle to find an affordable apartment. Even though source of income discrimination is now prohibited in Washington State, survey results reveal that this is still taking place and voucher holders struggle to find a property owner who is willing to accept their voucher.

How do these needs compare to the housing needs of the population at large

These needs do not differ greatly from the population at large. Many referral programs and resident support that were available pre-pandemic, are no longer available, have limited capacity or have shifted their focus post-pandemic. Safety and affordability are concerns for most community members. Many residents in are community are cost burdened. There is a general need for more permanently affordable and below-market housing units, and for those with barriers such as poor rental history or low credit scores, individualized supports to obtain and retain stable housing are also needed. Even low-income

residents who already live in subsidized or income restricted units still report that they struggle to afford rent payments.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

As a jurisdiction, there are three main sources of data on the homeless population: The 2022 Point-in-Time Count, the Whatcom Homeless Service Center and the Homeless Outreach Team (all administered by the Opportunity Council). This data is county-wide, so the information below includes all of Whatcom County. Therefore, the numbers given below will be slightly greater than what would be likely for Bellingham alone. That said, Bellingham is by far the largest city in Whatcom County, and most of the services and facilities for people experiencing homelessness are located here.

In addition, the city's largest emergency shelter is Base Camp, operated by the Lighthouse Mission Ministries, which serves on average about 1,200 unique individuals per year. The shelter can accommodate 200 overnight guests per night, and most of these guests (estimated about 60%) do not consent to having their data entered into HMIS, and therefore are not counted in the estimated number experiencing or becoming homeless each year.

One important and troubling trend that has emerged since the prior Consolidated Plan has been the increasing number of families with children who are experiencing homelessness, and the duration of their homelessness. A group of stakeholders was convened by the City, with funding assistance from a local foundation, to gather data, investigate possible solutions, and propose a strategy to appropriately address the needs of this population. A report from November 2021 summarizes this trend:[1]

"In late 2019, Whatcom County had nearly reached its goal of getting to "functional zero" in the number of families with children experiencing homelessness. Meaning when families with children did experience homelessness, it was brief (soon able to re-enter stable housing) and non-recurring (the family did not become homeless again soon thereafter). However, the number of families with children experiencing homelessness in Whatcom County surged soon after the start of the COVID-19 pandemic, doubling from 49 in February 2020 to 113 in February 2021.[2] The rising numbers of this demographic were part of an overall increase in homelessness in Whatcom County yielding a year-over-year increase of 22% from 2020 to 2021. Yet the rate of homelessness for families with children outpaced that of other groups of homeless people, with an increase of 50% in the same year-over-year growth period.[3]"

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	242	14	1,150	824	267	191
Persons in Households with Only Children	1	2	0	0	0	0
Persons in Households with Only Adults	407	166	1,088	759	149	255
Chronically Homeless Individuals	48	85	506	307	70	327
Chronically Homeless Families	34	9	174	48	40	274
Veterans	36	10	81	63	20	250
Unaccompanied Child	2	2	1,150	824	267	191
Persons with HIV	0	0	0	0	0	0

Table 26 - Homeless Needs Assessment

Data Source Comments: Due to COVID, fewer questions were asked in the PIT count 2022, there is a lot of missing data on the chronic questions for PIT so this is likely an undercount for chronically homeless individuals and families

Indicate if the homeless population is: Has No Rural Homeless

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	0	0
Black or African American	0	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	0	0
Not Hispanic	0	0

Data Source

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The Whatcom Homeless Service Center (WHSC) reported that they continue to see unprecedented numbers of families with children entering the Housing Pool. From January to December 2022, 30% of households on the Housing Pool were families with children (315 out of a total of 1,022 households). The WHSC reported that of the 702 households active in the Housing Pool in Q4 of 2022, there were 178 were families with children who are awaiting a placement.

There has been a decrease of the number of Veterans seeking assistance through the Housing Pool, but with an uptick in the last year. In 2018 there were 116 applicant households that were Veterans, and that number fell steadily each year, to a low of only 40 applications in 2021. In 2022, there were 76 applicant households who were headed by a Veteran.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

The Whatcom Homeless Service Center (WHSC) reported that they continue to see unprecedented numbers of families with children entering the Housing Pool. From January to December 2022, 30% of households on the Housing Pool were families with children (315 out of a total of 1,022 households). The WHSC reported that of the 702 households active in the Housing Pool in Q4 of 2022, there were 178 were families with children who are awaiting a placement.

There has been a decrease of the number of Veterans seeking assistance through the Housing Pool, but with an uptick in the last year. In 2018 there were 116 applicant households that were Veterans, and

that number fell steadily each year, to a low of only 40 applications in 2021. In 2022, there were 76 applicant households who were headed by a Veteran.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The number of people who are homeless over the course of any given year is much larger than those who are experiencing homelessness on a single night. Still, our annual Point-in-Time count shows the nature and extent of sheltered and unsheltered homelessness over time. Looking at data over the past decade, we see that the total number of people experiencing homelessness on a given night is climbing. At the same time, we can see that investments in services and shelters are working, because although the need is even greater than it was during the previous Consolidated Plan, the percent of those who are unsheltered continues to decline. In 2022 there were 832 homeless individuals on a given night, and 22% of those individuals were unsheltered – living outdoors, in tents or cars. In 2018, there were 815 homeless individuals on a given night, and 47% were sheltered. This 25-percentage point increase in sheltered individuals in five years is a notable accomplishment for our community.

Discussion:

Since the time of this report, the number of homeless households with children, and those participating in motel stay programs has continued to increase. The City of Bellingham and partners in Whatcom County continue to prioritize this vulnerable population, hoping to break the cycle of homelessness. A new permanently affordable rental housing project by Mercy Housing Northwest has recently opened in Bellingham, with many homeless families able to move into these newly available units. However, the root causes of family homelessness, and homelessness in general, remain. The City of Bellingham anticipates that as COVID-19 specific funding sources and rental assistance programs come to an end, the trends we have seen in recent years will continue to worsen.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Through data analysis and community and stakeholder feedback, the City has prioritized the following special needs groups who are especially vulnerable to housing insecurity and homelessness.

- Elderly persons
- Low-income families with children
- Persons with a disability
- Survivors of domestic violence
- Persons who are medically fragile or have with chronic health conditions

Because these same populations also are overrepresented in our population experiencing homelessness, it is critical that adequate services and housing is available to prevent future homelessness.

Describe the characteristics of special needs populations in your community:

Elderly persons:

There are estimated to be 14,206 residents aged 65 and above in Bellingham (16% of the population). Of these older residents, 30% have a disability. The need for housing and services for the elderly population continues to increase as these demographics age and grow, as we have seen since our previous Consolidated Plan. The elderly population is also especially likely to be cost burdened if they rent. For example, 23% of elderly family households and 47% of elderly non-family households who rent are *severely* cost burdened, paying over 50% of their incomes for rent.[1]

Low-income families with children:

Low-income families with children in Bellingham are struggling with rising housing costs, childcare costs, and inflation which is increasing the cost of basic needs such as food, school supplies, transportation, and hygiene products. Seventeen percent (17%) of families with children in Bellingham are below the poverty level, but 70% of all single female households with children are below the poverty level. Single parent families are especially vulnerable and must rely on childcare subsidies and other programs to stay afloat.

Persons with a disability:

Twelve percent of the population of Bellingham has a disability of any type.[3] However, disability is much more common among low-income residents. For example, among renter households earning less

than 30% of the area median income, 36% have an ambulatory limitation and 30% have a self-care or independent living limitation.[4]

Survivors of domestic violence:

Individuals and families who have survived domestic violence are especially vulnerable to further trauma due to the disruption that domestic violence causes on employment, housing, education, and the effects on mental health. Whether or not a survivor becomes homeless, they often must abruptly change jobs, schools, or where they live and seek support from trained mental health counselors.

What are the housing and supportive service needs of these populations and how are these needs determined?

Many of the needs of the disabled, elderly, and medically fragile population are overlapping. All these groups need more affordable, supportive living environments that meet their unique needs. For example, community feedback from families of developmentally disabled adults and seniors both expressed a desire for more shared housing options where adults could share expenses, chores, and common areas, but still have autonomy and privacy. Bellingham's housing stock is very constrained and has historically catered to nuclear families, students, and young professionals. Many groups have expressed strong desire for more diverse housing types which can be flexible and provide stability and support for those with cognitive or mobility limitations, but who do not need a skilled nursing facility.

Survivors of domestic violence, especially adults who are parenting, need more trauma-informed options where they can have privacy and services to help them heal. Motels are used as emergency shelter for families with children, including those who have multiple challenges, such as a history of domestic violence and substance abuse. Clients and their case managers report that motels are not the proper environment for children or for those who need to recover from addiction and trauma. The community currently has no such facility for emergency shelter, and very few units of permanent supportive housing or transitional housing for those with complex mental health or behavioral health needs.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Data for the Eligible Metropolitan Statistical Area is not available, so for these purposes the population of Whatcom County is used. There are 253 reported cases of HIV positive individuals living in Whatcom County. This is an increase from the previous Consolidated Plan, and represents 2% of the known cases in Washington State.[1] These households are provided subsidized units through a HOPWA allocation.

Sean Humphrey House is the only housing organization specializing in providing care for adults living with HIV/AIDs. Their residence is currently full with 6 permanent residents, although they have recently

purchased a second residence to house an additional 6 permanent residents (intending to increase to 8 residents after 2 years, consistent with state adult family home rules).

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

Discussion:

There are additional special needs groups in the community that are prioritized in this plan.

Persons who are medically fragile:

While data sources available for other groups do not include persons who are suffering from chronic health conditions or are medically fragile, community feedback from practitioners tells us that there is a serious need for more skilled care facilities, adult family homes, and other housing with support services for low-income adults who are not able to work and cannot care for themselves.

The types of disability most common among the non-elderly adult population in Bellingham is cognitive difficulty. Mental health disability is possibly the biggest non-homeless special needs group in the jurisdiction, and significantly impacts the homeless population.

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The City of Bellingham aims to remain responsive to the needs of local agencies as new priorities arise. In the past, we have responded by supporting community groups who identified a need for facilities in neighborhoods, and the city will continue to do so in the future – especially prioritizing areas that lack services and opportunities for residents.

While not all these needs are under the purview of City programs or funding resources, the non-housing public facilities that members of the community have advocated for are:

- An immigrant resource center
- More drug and alcohol rehabilitation centers
- A day-use center for the unsheltered population
- Hygiene facilities for the unsheltered population, such as restrooms and showers
- Designated climate emergency centers (with air conditioning, heat, air purification) for vulnerable groups
- More childcare centers

How were these needs determined?

Community organizations that are led by or work directly with low-income residents are the best source of information on community development needs. The City annually releases a Notice of Funding Availability for Community/Public Facilities and Improvements. Nonprofit organizations or community groups are welcome to submit ideas or applications for funding, which is granted on a competitive basis.

During the Public Participation Process, the City's Engage Bellingham website also asked residents to submit ideas and suggestions on Public Facilities & Services. Questions about what public facilities and services are needed were also accessed through multiple targeted on-line surveys and in-person engagement events.

Describe the jurisdiction's need for Public Improvements:

Most of our public infrastructure is essential to human health and safety, including providing access to clean drinking water, disposal and treatment of sewage and other solid waste, our transportation system, and protecting and restoring environmental services. The City has three utilities to operate, maintain, and improve access to essential services: water, sewer and storm and surface water, and an additional fund for protecting Lake Whatcom, our drinking water supply. Additionally, transportation needs are managed with a multi-modal focus that prioritizes the safety of the most vulnerable users first, those that walk, bike, or roll. Improvements to all these essential services vary from updating aging

infrastructure, adding to existing facilities or creating new infrastructure to support growth areas, including improvements to our water and wastewater treatment plants.

How were these needs determined?

The City's Public Works Department manages and responds to many of the jurisdiction's needs for public improvements. Much of the work is guided by strategic long-term planning that integrates community priorities with a robust asset management approach to ensure continued services. Public Works uses the following plans to guide decisions for public improvements related to transportation and utilities:

- 2009 Water System Plan: addresses maintenance and future improvements for our water system; includes water rates (update coming in 2024).
- 2020 Stormwater Comprehensive Plan: same as above but for the stormwater system.
- 2009 Comprehensive Sewer Plan: same as above for the sewer/wastewater treatment system (update coming in 2026).
- 2016 Wastewater Conveyance Plan: addresses wastewater collection and transmission need for non-serviced areas within and near the Urban Growth Area.
- 2020-2024 Lake Whatcom Management Plan Work Plan: addresses priorities program areas for improving the water quality in our drinking water source, Lake Whatcom.
- Pedestrian and Bicycle Master Plans: long-term plan that prioritizes multimodal improvements (updates coming in 2024).
- Urban Forestry Management Plan: a strategic plan to maintain a healthy and desirable urban forest is in development, anticipated adoption in 2024.

Describe the jurisdiction's need for Public Services:

Many of the services provided by our community partners continue to be in high demand. These include:

- Mental health counseling
- Food security programs, such as food banks and meal delivery for elderly/medically fragile residents
- Literacy and job training
- Landlord/tenant mediation and dispute resolution services
- Legal assistance for low-income tenants
- Subsidized childcare
- Social supports for developmentally disabled adults
- Family Resource Centers located on-site at public schools
- Domestic violence support services

How were these needs determined?

During the Public Participation Process, the city conducted multiple targeted on-line surveys and in-person engagement events, which included questions about the public services and facilities most needed in the community. All surveys were translated into Spanish, and interpretation was provided at in-person events. The City's Engage Bellingham website also asked residents to submit ideas and suggestions on Public Facilities & Services. Staff conducted multiple workshops and interviews with case managers and other direct service providers as well. These efforts all informed the selection of the Consolidated Plan goals and priorities.

The city releases a Notice of Funding Availability for Human Services every two years. Nonprofit organizations or community groups can submit applications for funding, which is granted on a competitive basis. Any non-profit that provides services within the City of Bellingham is welcome to apply. Applications are scored by a committee of housing or human services professionals and local funding agencies, and a final recommendation is provided by the Community Development Advisory Board during an open, public meeting.

Housing Market Analysis

MA-05 Overview

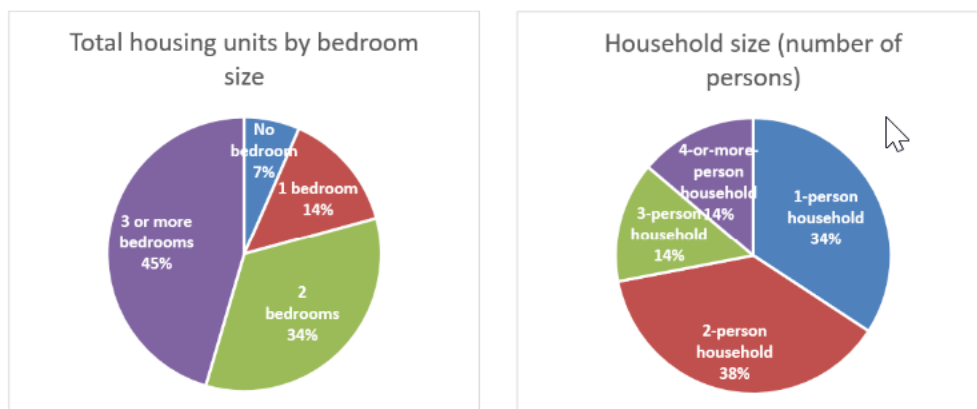
Housing Market Analysis Overview:

Population growth in Bellingham has remained steady over the past few decades, but it has not exceeded the statewide average. Washington State as a whole is increasing in population, and Bellingham has absorbed its proportionate share. From 2010 to 2022, the population of Washington grew by 17% and the population of Bellingham grew by 16.1%.

Fifty-four percent (54%) of households in Bellingham are non-family households; data sources classify these as “other household types,” but they include individuals living alone or with roommates. Only 3% of households in the city are large family. Compare this to Bellingham’s housing stock, where most of the single-family housing stock has 3 or more bedrooms. Not only is there an overall lack of housing, but there is also a serious mismatch between the kinds of households in Bellingham and the housing stock being offered.

The two pie charts below illustrate a disconnect between the housing units that exist in Bellingham and the households that live here. Forty-five percent of our housing units have three or more bedrooms, while only 28% of our households or families have 3 or more people. The market is providing larger houses than people need or can afford in today’s market.

Although the private housing market provides adequate housing choices for those earning 100% of area median income (AMI) and above, it cannot meet the needs of low-income households earning less than 50% of the AMI, or even 80% for larger households. This is a factor of the high cost of construction, and the limited availability of units that can be built with public funds.



Households vs. Housing Unit Sizes

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Although multifamily housing is being added to the overall housing stock at a faster rate than single-family detached units, the largest proportion of housing units (45%) are still single unit detached homes. Altogether, multifamily units of all sizes make up 48% of housing units. Mobile homes, boats, RVs, and attached one-unit structures such as mother-in-law units or ADUs make up the remaining units.

Smaller units (0 and 1-bedroom) are more likely to be renter occupied, whereas larger units (3 or more bedrooms) are more likely to be owner-occupied. Of the total number of two-bedroom units (11,925), 62% are renter-occupied and 38% are owner-occupied. Although most new units built in the past five years are multi-family developments, the overall distribution of housing units and tenure has changed only slightly since the previous Consolidated Plan period.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	18,791	45%
1-unit, attached structure	1,580	4%
2-4 units	5,072	12%
5-19 units	6,569	16%
20 or more units	8,564	21%
Mobile Home, boat, RV, van, etc	915	2%
Total	41,491	100%

Table 27 – Residential Properties by Unit Number

Alternate Data Source Name:

2017-2021 American Community Survey (ACS)

Data Source Comments:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	115	1%	2,200	11%
1 bedroom	475	3%	4,540	24%
2 bedrooms	4,520	28%	7,405	38%
3 or more bedrooms	10,895	68%	5,155	27%
Total	16,005	100%	19,300	100%

Table 28 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Below is a summary of the total number of units by type of housing program, as of January 2023. The population designated as “low income” varies by income level depending on the specific program. For example, most permanent low-income housing units are restricted to residents making 60% AMI and below, but for the City-run Home Rehab Program, homeowners who are seniors or disabled can have an income of up to 80% of the AMI. Depending on the type of housing program a housing unit could be a house, an apartment, a motel room, or a bed/cot. Therefore, the total units below should be considered roughly equivalent to the number of households that can be served, not the number of individuals.

*Note that there is significant overlap between vouchers and public housing units, since some low-income recipients may use their vouchers in the public housing as opposed to on the private market. Vouchers administered by BHA can be used anywhere within Whatcom County, so a percentage should be assumed to be housing outside of the jurisdiction.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Several properties in Bellingham have all or some of their units set aside as affordable units as part of state or federal tax credit programs. These programs have an expiration date, meaning that some units may be at risk for substantial rent increases once rent restrictions from the tax credit programs lapse. In Bellingham there are currently 29 tax credit properties with a total of 2,224 rent-restricted units. Out of 29 properties, all but 4 are owned and operated by non-profit housing groups such as the Bellingham Housing Authority, Catholic Community Services, or Mercy Housing Northwest. Mission-driven affordable housing enterprises may be expected to seek to retain all or most of these units in affordable status, either as a business choice or after receiving grants or other assistance to pay for necessary expenditures such as maintenance. However, although there are only 4 for-profit tax credit properties, together they comprise nearly one third (28%) of all tax credit units.

The City of Bellingham is committed to working proactively with partners and other funding agencies to ensure that rent-restricted units do not become market rate, which would price low-income residents out of their homes. In 2022, the City of Bellingham helped Mercy Housing Northwest to acquire Evergreen Ridge Apartments, which had tax credits that were due to expire in 2025. Together, our community was able to work proactively to ensure that the 145-unit building would not be sold on the private market, and instead would be retained as permanently affordable housing.

Does the availability of housing units meet the needs of the population?

No. As indicated by the increasing homelessness, housing instability, and cost burden in our community, the availability of housing does not meet the needs of the population.

- There are at maximum 4,727 permanently affordable housing units/rental vouchers in Bellingham (and far less if accounting for overlap and vouchers used outside of the city). This is compared to the approximately 12,000 households that earn below 50% of the AMI.

- Altogether there are an estimated 14,505 households in Bellingham are cost burdened, and 7,615 of these households are severely cost burdened.[1]
- Seniors on fixed incomes, even those who live in an income-restricted unit, are highly cost burdened; 63% of all seniors who rent are cost burdened.
- Families with children struggle to find housing that they can afford, and which also meets their needs. Over half of families who rent are cost burdened, and 12% of all families with children live below the poverty level.
- Affordable student housing is lacking, meaning that students from moderate-income families are forced to take on an increased amount of debt to fund their education.
- There are limited options for low- and moderate-income families to purchase a home that is affordable to them, reducing the number of young people who can begin to build equity and secure housing that will remain affordable.

Describe the need for specific types of housing:

While there is a general housing shortage, the most acute needs are for the following types of housing:

- Permanent supportive housing for disabled adults
- Permanently affordable rental units for people earning less than 30% AMI
- Smaller units that are available for purchase for low- and moderate-income households

Discussion

It is important to note that most of the tax credit units in the city are “rent restricted”, but they still may be unaffordable to very low-income residents when there is no direct subsidy tied to the tenant. For example, a resident must earn below 30%, 50% or 60% of the area median income (AMI) to qualify for a rent restricted apartment in a tax credit property. But if that resident earns only 25% of AMI, then they would still be cost burdened, despite having below-market rent. Public feedback tells us that this is becoming increasingly common.

In addition to the need for more emergency and specialty shelters, there is a need for permanent housing especially for vulnerable groups. Of the 707 homeless households on our Housing Pool in February 2022, almost half were deemed to be in need of permanent supportive housing. These are individuals who cannot live without support due to mental health, physical or developmental disability, or substance use disorder. We have a shortage of available units in permanent supportive housing, and also a shortage of qualified operators who are able to expand their capacity.

In addition to those who need supportive housing, there are many whose very low incomes keep them extremely vulnerable to housing instability and homelessness. This is especially true for our seniors and disabled residents on fixed incomes. Even in some of our already permanently affordable housing units, some residents are cost burdened because they earn even less than the income bracket for which their unit is targeted.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

Bellingham has seen a significant rise in the cost of housing (both for rental and homeownership), that has greatly surpassed the rise in local incomes.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2022	% Change
Median Home Value	300,900	622,000	107%
Median Contract Rent	699	1,693	142%

Table 29 – Cost of Housing

Alternate Data Source Name:

Bellingham annual market rent study

Data Source Comments: In addition to the market rent study used for median contract rent, Whatcom County Assessor data from 2022 was used to determine the median home value.

Rent Paid	Number	%
Less than \$500	1,900	9.9%
\$500-999	10,695	55.4%
\$1,000-1,499	4,530	23.5%
\$1,500-1,999	1,535	8.0%
\$2,000 or more	650	3.4%
Total	19,310	100.1%

Table 30 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	735	No Data
50% HAMFI	2,735	545
80% HAMFI	10,920	1,325
100% HAMFI	No Data	2,460
Total	14,390	4,330

Table 31 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	747	811	1,058	1,530	1,858
High HOME Rent	747	811	1,058	1,303	1,434
Low HOME Rent	692	741	890	1,028	1,147

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

	Studio	1-bed	2-bed	3-bed
Presumed HH Size	1	2	3	4
Market Rent + Utilities	\$ 1,351	\$ 1,431	\$ 1,762	\$ 2,504
30% MFI	\$ 476	\$ 510	\$ 612	\$ 707
60% MFI	\$ 952	\$ 1,020	\$ 1,225	\$ 1,415
80% MFI	\$ 1,270	\$ 1,452	\$ 1,634	\$ 1,814
100% MFI	\$ 1,588	\$ 1,815	\$ 2,043	\$ 2,268
120% MFI	\$ 1,905	\$ 2,178	\$ 2,451	\$ 2,721

Market rate rental affordability by income and household size

Is there sufficient housing for households at all income levels?

No. The table below compares the market rent to a presumed household size according to the number of bedrooms. A single-person household earning 100% of the median income can just afford a market-rate studio unit at the median cost of \$1,588 per month. (Due to the number of new, luxury studios coming on the market, the median cost of a studio apartment was slightly higher than a 1-bedroom in 2022.) A 4-person household earning the median family income of \$97,300 per year could not afford a median-priced market-rate rental 3-bedroom unit without being cost burdened. No median-priced rental would be affordable to any household earning 80% of the median income.

The outcome of this is evident in our high percentage of renter households that are cost burdened.

The availability of housing for potential homeowners is even more dire. Homes sales data from 2021 obtained from the Whatcom County Assessor's office shows a median value of \$622,000 for all home sales, which includes 748 single-family homes and 244 condos. Single family homes had a median sales value of \$680,000 and condos had a median sales value of \$375,000. A 4-person household earning the median income of \$97,300 in 2022 could afford a purchase price of \$418,000, which is over \$200,000 below the median sales price.

How is affordability of housing likely to change considering changes to home values and/or rents?

If current trends continue, the cost of housing will continue to rise and become even less affordable to Bellingham residents at lower incomes. Although more market-rate and subsidized housing is continually being built in the city, construction still lags demand. With current construction costs above \$400,000 *per unit* for a small apartment in a large multifamily building (the most cost-effective way to build housing), new units must be heavily subsidized to be affordable to residents that earn less than 100% of the AMI. Unless home values or construction costs fall steeply, or there are substantial increases to funding for subsidized housing, we do not predict there to be a significant increase in the percent of housing that is affordable to residents earning less than the median income.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HUD's "Fair Market Rent" is significantly lower than actual area median rent. Each summer, staff conduct a market study of all rental properties with 3 bedrooms or less that are advertised for rent on public platforms. Comparing these to HUD's Fair Market Rent, we see a difference of 137% - 166%, with the biggest gap for smaller sized units. Bellingham has proposed an alternative rent payment standard of 130% FMR based on the results of this market study. The table below shows how Bellingham's area rent (adjusted, based on 95% of median rent) compares to the HUD Fair Market Rent in 2022. This significant difference impacts the city's strategy in that we must designate a higher allowance for rapid rehousing and other rental subsidy programs locally, and to invest local dollars in rental assistance where federal programs do not pay the market rate.

Discussion

Our local and regional housing market is not able to meet the demand for housing at a price that moderate or low-income residents can afford. The result is a high rate of cost burden, which has several implications for our society. Heavy reliance on other social services, like childcare subsidies and food programs is a symptom of the high rate of cost burden. Homelessness is another.

The figure below compares the number of households at each income level to the estimated number of units that are affordable to that same income level. There are many more units affordable per household for those earning from 50-100% of the Area Median Income (AMI) because most of the households earning less than 50% AMI are cost burdened, meaning they are paying too much of their income for housing.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

During and prior to the Consolidated Plan public comment period, residents notified elected leaders and staff about ongoing concerns with the safety and maintenance of both privately owned and public rental properties in Bellingham. At this time, City Council is reviewing all components of the Rental Registration & Safety Inspection program and will be considering the best ways to ensure the 19,890 registered units,[1] as well as those yet to register, are safe places for tenants to live.

Definitions

Standard condition – the unit is compliant with all state and local building and safety codes.

Substandard condition but suitable for rehabilitation – the unit is not in compliance with local or state building and safety codes, has incomplete plumbing or kitchen facilities, or has failed the third rental registration inspection – but is otherwise both financially and structurally suitable for rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,910	24%	10,450	54%
With two selected Conditions	85	1%	680	4%
With three selected Conditions	0	0%	60	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	12,005	75%	8,110	42%
Total	16,000	100%	19,300	100%

Table 33 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	2,630	16%	4,030	21%
1980-1999	4,075	25%	6,570	34%
1950-1979	4,720	30%	5,030	26%
Before 1950	4,575	29%	3,670	19%
Total	16,000	100%	19,300	100%

Table 34 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	9,295	58%	8,700	45%
Housing Units build before 1980 with children present	1,520	10%	580	3%

Table 35 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	2,077	0	2,077
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 36 - Vacant Units

Alternate Data Source Name:

2017-2021 American Community Survey (ACS)

Data Source Comments: Data from 2017-2021 ACS table B25004. Most of the approximately 2,000 vacant units in the city are unoccupied because they are second homes, in the process of being sold or remodeled, etc., not because they are in poor condition or abandoned.

Breakdown of total vacant units

Vacant, for rent = 774 (3.5% of all rental units)

Vacant, rented = 200

Vacant, for sale = 144

Vacant, sold = 15

Vacant, seasonally occupied = 446

Vacant, other = 498

Total Vacant = 2,077 (4.9% of all units)

Need for Owner and Rental Rehabilitation

The Whatcom County Assessor's assigns a valuation of housing quality using a rating scale from "Excellent +" to "Low". As of February 2023, 393 single-family units (or about 2% of single-family

housing stock) has a designation of “Fair” or lower. Only 40 out of the 19,347 current single-family units in Bellingham have a designation of “Low” or “Poor” quality condition (2021 assessor evaluation).

An alternative analysis was performed using 5-year 2021 ACS data. There were 64 occupied units which lacked complete plumbing facilities and 731 units lacking a complete kitchen, for a total of 795 “substandard” units out of 39,496 total occupied housing units. This also suggests that about 2% of all housing units are substandard.

For rental housing, the City of Bellingham administers a Rental Registration and Safety Inspection program which began in August of 2015. Property owners are required to register their rental properties with the city and undergo a health and safety inspection approximately every three years to review items found on the Safety Inspection Checklist.[1] Since creation of the program and as of the end of March 2023, 11,062 units have been inspected. This includes the second round of inspections of several neighborhoods. State law requires that all rental safety inspection programs allow the use of private inspectors. City staff have inspected approximately 70% of the rental units with private inspectors covering approximately 30%.

The most common issues identified by city inspectors include lack of smoke and carbon monoxide alarms or no batteries in them, emergency egress (windows) not meeting height standards or painted shut, missing, loose, or broken handrails, unsafe decks, and unprotected or exposed wiring.

Of the city-inspected units, 1,510 failed the first inspection; this does not count the number of units that had minor deficiencies and were passed with conditions. Of those that failed, 248 units failed the first re-inspection and 79 failed a second re-inspection. According to information received from private inspectors, only 24 of the units failed the inspection (representing less than 1% of the units inspected). This is a substantial deviation from what city inspectors reported but may be the result of the city not receiving copies of the inspection checklist or under-reporting of units that failed the first inspection but that ultimately passed.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Lead based paint is more common in housing units built before 1980, and more of a health hazard when young children are present. The 2013-2017 ACS data indicate that 58% of owner-occupied housing units and 45% of renter-occupied housing units were built before 1980. Of those, there are 1,520 owner households and 580 are renter-occupied households with children under 6 years of age.

Low- and moderate-income households may have less ability to remove or suppress lead paint, which can be quite expensive. Subtracting out households earning over 80% AMI, the risk of lead-based paint hazard is most likely to be highest in 625 owner-occupied households and 359 renter-occupied households that are moderate or low income, for a total of 984 households.[1]

Discussion

Rapidly increasing property values and high demand for housing means that Bellingham has relatively few blighted or abandoned properties – so few that there is no database for tracking such properties. Using available data, the rough estimates above have been used to approximate the need for residential property rehabilitation based on the age and value of the home, and lead paint danger by the number older households with young children present. However, these are only estimates.

The City has an ongoing program to help low-income homeowners make health and safety repairs, including stabilization of lead paint. Since 2001, 273 homes in Bellingham have been rehabilitated through the Home Rehabilitation Loan Program. Low-income homeowners who qualify can receive zero-interest loans for necessary repairs which keep owner-occupied properties from becoming blighted or condemned.

The Rental Registration and Safety Inspection program, initiated in 2015, is intended to ensure that all rental properties are meeting local health and safety codes, and that property owners are making necessary ongoing repairs. The Covid-19 pandemic put health and safety repairs on hold for several years, though, and public comments have recently surfaced which call into question the effectiveness of this program in addressing the issue of substandard rental housing. The intense shortage of affordable housing also means that residents may fear rental cost increases if they report violations or request repairs, making enforcement difficult.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Since the previous Consolidated Plan, the City of Bellingham has contributed to several buildings that together add over 660 units to the supply of affordable housing for low-income and vulnerable residents. The largest projects are listed in chronological order below, and can also be viewed on an interactive map available at cob.org/housingservices.

- **22 North**, 40 units of permanent supportive housing for formerly homeless adults, youth, and veterans, operated by the Opportunity Council. Northwest Youth Services provides case management to young adult residents. Completed in 2018.
- **Eleanor Apartments**, 80 units for low-income and homeless seniors, operated by Mercy Housing Northwest. Completed in 2019.
- **Heart House**, 11 units of permanent supportive housing for formerly homeless families, operated by Lydia Place. Completed in 2022.
- **Trailview Apartments**, 77 units for low-income and homeless families with children, operated by Mercy Housing Northwest. Completed in 2022.
- **Evergreen Ridge Apartments**, 145 units for low-income households, acquired by Mercy Housing Northwest in 2022 to prevent it being sold on the private market.
- **Samish Commons**, 171 units for seniors, families, and formerly homeless households, operated by the Bellingham Housing Authority. To be completed in 2023.
- **Laurel & Forest**, 56 units for low-income and homeless seniors, operated by the Opportunity Council. To be completed in early 2024.
- **Millworks**, 83 units for low-income families, operated by Merch Housing Northwest. It just broke ground in December 2022, and completion date is early 2024.

The City and our nonprofit partners are continually working to secure new sites and funding for permanently affordable housing. However, with construction costs being at an all-time high, the production of new affordable housing units still lags far behind the demand.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	567	1,985	318	1,422	55	0	190
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

Alternate Data Source Name:

BHA

Data Source Comments:

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Bellingham/Whatcom County Housing Authority (BHA/WCHA) has 567 public housing units (504 operated by BHA + 63 operated by WCHA) that participate in an approved PHA Plan. Units are maintained in a safe and sanitary manner and meet required inspections standards. A Real Estate Assessment Center inspection was completed on all units in December 2022 and scores ranged from 94 to 97 out of 100. That said, the housing authority must acknowledge that its portfolio is aging. Its three senior/disabled high rises are now over 50 years old and have significant needs that will require repair/replacement over the next 1-5 years. The Public Housing program receives an annual Capital Fund to undertake rehabilitation, modernization, and capital improvements. The Capital Fund is determined via HUD formula that varies from year to year. As an industry, it is widely acknowledged that the Capital Fund is grossly inadequate to address the growing needs of the Public Housing program. It is common for housing authorities to defer significant projects to accumulate multiple years' worth of capital funds to complete a project.

Public Housing Condition

Public Housing Development	Average Inspection Score
Highrise Public Housing	97
Family Public Housing	94
Whatcom County Public Housing	96

Table 38 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

The majority of the PHA's housing stock is between 30 - 50 years old, and although these properties are well maintained, many systems are reaching the end of their useful life or obsolescence. Over the next 1-5 years, the PHA will need to undertake substantial repair/replacement projects, in addition to the daily maintenance and turnover needs. Projects include repair/replacement of the high-rise waste lines, elevators, and generators. Replacement of roofs, gutters, windows, siding, and ventilation throughout its portfolio. Replacement of playgrounds at family properties. The PHA also intends to create cooling rooms at its three high rise properties. This list is updated as new needs are identified and prioritized based off the urgency of the repair/replacement and funds available. The needs far outweigh available resources meaning that only the most significant and pressing needs can be addressed, which results in a backlog of preventative and proactive improvements.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The PHA operates a strong preventative maintenance program in conjunction with the Capital Fund Grant program referenced above. Capital needs are assessed and prioritized annually, with adjustments during the year to accommodate emerging needs. Where possible, the PHA prioritizes projects that improve the living environment for its clients. Examples include exterior envelope upgrades to maximize energy efficiency, ventilation system upgrades to ensure airflow and healthy living environments, and safety/security upgrades adding cameras, signage and increasing lighting and sightlines. In response to our changing climate, the PHA is turning its attention, where possible, on increasing climate resiliency through energy conservation measures and the addition of cooling rooms in high-rise buildings that do not have air conditioning.

The PHA has also completed a staffing restructure to increase customer access and interaction. Client needs have increased, and with fewer referral support opportunities, the PHA is having to divert resources from other areas to close these gaps as much as possible. Traditional activities, such as resident meetings, social gatherings and classes were largely put on hold during the pandemic. It is the PHA's goal to resume these activities as much as possible but acknowledge that there is a significant strain on staff and resources navigating new challenges such as safety, substance abuse, behavioral health, and the impacts each have on residents, their homes, and the properties.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Bellingham’s homeless housing and service organizations participate in Whatcom County’s coordinated entry system, and a database called the Homeless Management Intake System (HMIS). Whatcom County was an early adopter of this system, which is now recognized as a best-practice for housing people effectively across multiple organizations. In addition, the County and the City are committed to a Housing-First model and prevention-based strategies. That means the same coordinated-entry system serves people who are at-risk of homelessness, currently homeless, and re-entering society from institutional settings.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	36	67	65	34	8
Households with Only Adults	272	85	72	98	0
Chronically Homeless Households	0	0	0	138	0
Veterans	0	0	0	50	0
Unaccompanied Youth	16	0	4	20	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Data Source Comments: Note that many of the programs that serve homeless adults and children also serve chronically homeless households, but not exclusively. The figures above are not necessarily unduplicated, as some of the beds fall into multiple categories. For example, some projects have units designated for homeless and/or chronically homeless individuals. These units are represented in the other categories, and vouchers only for chronically homeless households are listed separately. The table above also includes vouchers where they are specifically for the utilization of the group listed (i.e., Veterans or chronically homeless households).

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Some of the agencies listed in the following section provide mainstream services as well as services to the homeless in partnership with other nonprofits and the Homeless Services Center. In addition, mental health service agencies are in partnership with a number of housing facilities providing temporary, transitional or permanent housing for homeless, and bring case managers and health providers to housing facilities to offer case management, services and appointments on site.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The Opportunity Council's Homeless Service Center, located in Bellingham, is the agency responsible for managing the coordinated entry system and rental assistance distribution in coordination with Whatcom County Department of Health & Community Services. All agencies that provide housing perform a standardized housing assessment that is administered at the point of entry. A standardized intake and vulnerability assessment is administered at entry and households are then referred to openings with the following partners:

- Catholic Community Services*
- Interfaith Coalition
- Lighthouse Mission Ministries
- Lydia Place*
- Mercy Housing Northwest
- Northwest Youth Services*
- Opportunity Council*
- Pioneer Human Services
- Sun Community Services
- YWCA

Other community partners that provide support to homeless households include:

- Catholic Community Services Recovery
- Compass Health
- Department of Social and Health Services (DSHS)
- Domestic Violence and Sexual Assault Services
- Lake Whatcom Treatment Center
- Low-Income Housing Institute
- Northwest Regional Council

- Road2Home
- SeaMar
- Unity Care NW
- Whatcom Alliance for Health Advancement

The Homeless Service Center supports key staff responsible for managing and coordinating across the partner agencies listed above. These are:

- HMIS Database Manager
- Homeless Outreach Coordinator
- Homeless Outreach Specialists
- Housing Referral Specialist
- Housing Retention Manager
- Landlord Liaison
- Leasing Specialist
- Motel program liaison
- Program Assistant

*These partners receive County Rental Assistance through the coordinated entry system.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

The Special Needs populations with the greatest housing and service needs in our jurisdiction are the elderly population, persons with disabilities, victims of domestic violence, and persons with behavioral health needs (including people with alcohol and drug addictions). As Bellingham's population ages and grows over time, the supportive housing and service needs of all these populations has continued to increase.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The supportive housing needs of these Special Needs groups are described in detail in section NA-45. The facilities and services are described here.

Elderly and Frail elderly

Altogether, there are 13 Skilled Nursing Facilities, Adult Family Homes, and Assisted Living facilities in Bellingham, with a total capacity of 934 beds (<https://fortress.wa.gov/dshs>). This does not include Senior Living or Retirement communities, which may provide meals and some services, but whose residents are capable of living independently and could live elsewhere in the community if they chose to. The table below shows the breakdown of long-term care facilities by type and which ones accept Medicaid. Of the 13 facilities listed below, 8 accept Medicaid, although that does not necessarily mean there are Medicaid beds available.

Persons with disabilities

The majority of the public housing units managed by the BHA are for either seniors or people with disabilities. Throughout the community, there are also a handful of organizations that offer in-home care, permanent supportive housing, transitional housing, and emergency shelter to adults with developmental disabilities and other needs.

- Lighthouse Mission Ministries' Special Needs dorm: 10 emergency shelter beds
- Opportunity Council's Evergreen House: 3 rooms for permanent supported housing in a shared house
- Sun Community Services' Gregg's House: 6 bedrooms of permanent supportive housing in a shared house; Nevada Street: 3 bedrooms of permanent supportive housing
- Options Housing: 3 bedrooms in shared house for adults with developmental disabilities
- Victims of domestic violence

Currently there are 167 beds/units in the city available to victims of domestic violence and their children. Not all of these beds are exclusively designated for those fleeing domestic violence. Some are available for women and children who are facing homelessness for other reasons, and many have domestic violence experiences in their backgrounds.

- DVSAS's Family Shelter: 22 beds
- DVSAS's Baker Place Shelter: 14 beds
- Lighthouse Mission Ministries' Agape Home: 60 beds (transitional housing for women and children)
- Lydia Place: 13 apartments
- Opportunity Council's Dorothy Place: 22 apartments
- YWCA's Larabee Residence: 27 beds (transitional housing) and 9 (emergency beds) for single women without children

Facilities for Elderly & Frail Elderly

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

A few housing providers offer re-entry housing in the area, but there is not nearly enough unit availability to meet the demand. Pioneer Human Services provides re-entry housing in the City Gate Apartments, Sun Community Services provides housing for those with mental health challenges who are also re-entering the mainstream. A partnership between Opportunity Council, Whatcom County, and Unity Care NW is underway and developing a new respite care facility for homeless individuals who are recuperating from hospital care; it is expected to be completed in 2024.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The 2023 Action Plan includes housing and supportive services for special needs populations to remain stably housed. It's estimated that 60 households will benefit from Rapid Rehousing and Tenant Based rental assistance this year. Households are typically a mix of families with children, households with disabilities, those who are homeless-on-entry, single-parent households, and singles. 102 households are expected to be assisted through 4 project-based programs: 22 North, Sun Community Services 2 PSH facilities, Francis Place, and Heart House. Many more households benefit through outreach and navigation services.

In addition, the City will continue to fund housing case management and intensive case management through ongoing agency partnerships, most of which serve both homeless and housed individuals with

mental and behavioral health challenges. These services are accomplished through our Housing and Human Services grants and linked to goals under those categories.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, and wages are not increasing proportionate to housing costs. As in many cities, the high percentage of single-family zoning relative to the total land area is quite high, leaving little variation of housing types outside of downtown and urban villages. Meanwhile, most of our historic neighborhoods contain duplexes, small apartment buildings, and other multi-family housing types that continue to provide more affordable housing options.

Market-price residential investment is already incentivized in the private market through a healthy demand. The City currently encourages private investment in affordable housing by offering a 12-year tax reduction incentive to developers that build multi-family housing which is affordable to households whose income is at or below 60% of the Area Median Income (AMI). The affordable housing requirement can also be met, either partially or fully, for any units with two or more bedrooms that are available to households whose income is at or below 80% of median family income adjusted for family size. However, this tax incentive has not been utilized because there is another exemption that requires no affordable housing component and grants an 8-year tax exemption.

Policies which may have a negative effect on affordable housing are those which limit supply of new units: for example, zoning requirements, such as single-family zoning, minimum lot size requirements, and restrictions on infill development. Currently, 42% of the City's total land area is zoned for single-family residential use, compared to 14% which is zoned for multi-family residential use.[1] This zoning puts constraints on where more affordable multi-family housing units are permitted.

Other local public policy that limits the supply of available land is our relatively high percentage of greenspace and park lands. Bellingham voters cherish their parks and land conservation is a strong value for many residents. This makes Bellingham a beautiful place to live, with many opportunities for outdoor recreation and enjoyment. It also limits the amount of land that is available for development.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The City's primary role in economic development includes: 1) provide strong leadership to create a positive environment, both physical and social, that supports business activity and a high quality of life for employees and residents; 2) ensure that there is enough properly zoned, developable land and infrastructure capacity to accommodate the expected 20-year employment growth and provide and maintain high quality infrastructure to support employment lands and 3) provide excellent services that foster business growth and retention, and minimize expense.

The City partners with the Port of Bellingham and Whatcom County and pool resources to deliver direct economic development services by funding the Port's Regional Economic Partnership. This partnership oversees contracts with Western Washington University's Small Business Development Center, maintains the "Choose Whatcom" website and oversee various contracts and carries out a variety of economic development focused activities. The City has designated a liaison to over a dozen agencies, including those mentioned above.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	678	459	2	1	-1
Arts, Entertainment, Accommodations	4,596	6,499	16	16	0
Construction	2,264	3,575	8	9	1
Education and Health Care Services	5,644	10,518	20	26	6
Finance, Insurance, and Real Estate	1,477	2,340	5	6	1
Information	808	947	3	2	-1
Manufacturing	3,313	3,409	12	9	-3
Other Services	1,455	2,111	5	5	0
Professional, Scientific, Management Services	1,933	2,090	7	5	-2
Public Administration	0	0	0	0	0
Retail Trade	4,516	6,267	16	16	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Transportation and Warehousing	794	448	3	1	-2
Wholesale Trade	1,120	1,080	4	3	-1
Total	28,598	39,743	--	--	--

Table 40 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	47,070
Civilian Employed Population 16 years and over	43,900
Unemployment Rate	6.76
Unemployment Rate for Ages 16-24	21.43
Unemployment Rate for Ages 25-65	4.18

Table 41 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	10,295
Farming, fisheries and forestry occupations	1,820
Service	5,385
Sales and office	10,720
Construction, extraction, maintenance and repair	2,805
Production, transportation and material moving	1,925

Table 42 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	34,170	84%
30-59 Minutes	5,055	12%
60 or More Minutes	1,380	3%
Total	40,605	100%

Table 43 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,280	110	910
High school graduate (includes equivalency)	4,660	390	1,960
Some college or Associate's degree	8,545	765	3,505

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	14,055	370	2,350

Table 44 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	140	125	170	330	425
9th to 12th grade, no diploma	810	610	485	575	555
High school graduate, GED, or alternative	3,955	2,190	1,305	3,510	2,860
Some college, no degree	10,810	3,125	1,780	3,700	2,410
Associate's degree	2,830	1,445	1,330	1,505	715
Bachelor's degree	2,180	4,270	2,750	4,115	2,915
Graduate or professional degree	60	855	1,770	3,035	2,270

Table 45 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,500
High school graduate (includes equivalency)	26,090
Some college or Associate's degree	31,610
Bachelor's degree	39,110
Graduate or professional degree	55,130

Table 46 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sectors in Bellingham are Education and Health Care Services (19% of jobs), Arts, Entertainment, and Accommodation (15% of jobs), and Retail Trade (15% of jobs). Altogether these three sectors make up 49% of the share of all jobs. These numbers indicate that Bellingham's economy remains predominantly a service economy.

Describe the workforce and infrastructure needs of the business community:

Workforce shortages continue to be problematic for businesses. Hiring and retaining staff remains challenging for most employers. Workforce shortages are leading to increased wages, yet increased wages are leading toward increased costs, especially in the service industries. Some parts of Whatcom County have deficiencies in broadband infrastructure, but Bellingham is fortunate to have an adequate supply. Businesses rarely identify infrastructure as an obstacle to doing business in Bellingham. However, businesses in Bellingham have stated that housing is a major concern for the largest employers. Attracting and retaining employees is made more difficult because potential employees cannot find housing in the area. Improving infrastructure in urban villages remains a priority for the City of Bellingham and well as investing in wetland mitigation banks. Lack of wetland mitigation banks contributes to some properties sitting vacant.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Support for the childcare industry was a focus for the City prior to the pandemic and is now even more so. The City has used its American Rescue Plan Act funds to support construction of several new centers and create a business grant program to support the retention and expansion of this industry. Scholarship programs to support the childcare workforce is a priority in Bellingham and Whatcom County. A recent Children's Levy was passed in Whatcom County, with an implementation plan still in development. This new countywide levy is expected to significantly help the childcare industry over time.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Home to a state university, community college, and a technical college, Bellingham has a highly educated workforce. Of adults aged 25 and over, 46% have obtained a bachelor's degree or higher, and 94.6% have at least a high school degree. Most of the jobs in the Education and Healthcare services require advanced degrees, so this highly educated workforce is a good fit with our major employers.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Opportunity Council conducts workforce training for low-income households, as does Worksource Whatcom and the Goodwill Job Training Center. The Opportunity Council does so as part of broader efforts that divert households from entering homelessness. Building the skills of the low-income workforce helping them to build assets yields more resilience to economic and household challenges, and ultimately less reliance on the services supported through this plan.

The Northwest Workforce Council (NWC) is the strategic and oversight body for the Northwest's workforce development system and is based in Bellingham. The NWC convenes partners, stakeholders, and elected officials in a myriad of strategy sessions ensures the system remains focused on the talent needs of business. One of their strategic goals is to align education, employment, and training services.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The jurisdiction is part of an Economic Development Strategy that encompasses all of Whatcom County. The capital project most relevant to the Consolidated Plan is to redevelop, through partnerships or other methods, city-owned properties, or chronic vacant buildings into mixed use developments compatible with the sub-area plans in an effort to spur additional private sector development to increase housing and job opportunities. HOME and CBDG funds were listed as one potential source of funding, however such a project would be contingent on establishing other partnerships.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

No, because very few households in Bellingham have multiple housing problems: just 3% of renters and less than 1% of owner households have more than one housing problem. Because there are so few households with multiple housing problems, there are no areas where they are concentrated at a level that is detectable with the available data.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

There are no areas that meet the HUD definition of racially or ethnically concentrated areas of poverty. Using an alternative threshold of "above average," where the percentage of non-White households are above 15% and households below poverty level are above 25%, several census tracts in the jurisdiction have both a higher-than-average concentration of low-income households and a higher-than-average concentration of minority households. These occur in the Cordata/Meridian neighborhoods in the north, and the City Center, Sehome, WWU, Happy Valley, and Puget neighborhoods in the central area of the city. The WWU neighborhood is expected to be an outlier because of the high concentration of students who fall into the poverty income level.

Other micro-areas that have high concentration of low-income minority households are in the city's manufactured home parks (MHP). The City of Bellingham has 10 MHPs spread throughout the jurisdiction. They are about 2.5% of the total housing stock but represent 16% of the affordable housing.

What are the characteristics of the market in these areas/neighborhoods?

There is a loose correlation between these neighborhoods and the percentage of multi-family housing and other kinds of affordable housing (like MHP). Like other areas of the city, the housing market is strong and there is high demand for all housing types, including rental apartments, condos, and manufactured homes.

Are there any community assets in these areas/neighborhoods?

There are many community assets in all these areas. Most of these areas are close to one of the city's urban villages, which offer a variety of services and employment opportunities. Our Parks Levy ensures equitable access to parks, trails, and open spaces. Bellingham School District provides quality education opportunities in all our neighborhoods. There is a Family Resource Center at Shuksan Middle School (near the Cordata/Meridian neighborhood) and another at Carl Cozier Elementary School in the Puget neighborhood.

Are there other strategic opportunities in any of these areas?

In April of 2022, the City Council voted to extend a moratorium on development applications and permits relating to the redevelopment of MHPs. Concerned residents, neighborhood groups, and city staff have been working with Resident Owned Communities (ROC) Northwest to educate residents about the potential to cooperatively purchase the land that these parks sit on to maintain affordability and resident control.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Almost all Bellingham residents have access to broadband internet services. Third party availability tools suggest that broadband availability for residents is between 98%-100%. There are multiple providers offering broadband services within the city limits to both residential and business customers. The city is not aware of specific neighborhoods lacking access to broadband services.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The City has franchise agreements in place with cable television providers Century Link and Comcast. Anywhere cable television is provided, Comcast also offers broadband internet service. Therefore, the entire Bellingham area is served with cable internet as well as television.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

The City of Bellingham's section of the updated Whatcom County Multi-Jurisdictional Natural Hazards Mitigation Plan 2021-2025 includes clarification and addition of actions that recognize the influence of climate change on the risks and impacts of natural hazards. [1] Changes in seasonal precipitation patterns and the duration and intensity of heat events that increase risks from natural hazards are widely attributed to climate change. The hazards influenced by climate change include drought, extreme temperatures and winter weather, flooding, erosion/subsidence, and wildfires.

Bellingham has recently experienced an unprecedented regional extreme heat event that resulted in hundreds of deaths throughout the region. Similar events are predicted to occur due to changing climate conditions.

In Bellingham, almost 10% of the area is exposed to a flood related hazard. There is inland flooding which more heavily impacts residents, and coastal flooding, caused by sea level rise. The multiple creek systems going through Bellingham including Chuckanut, Padden, Silver/Bear, Squalicum, and Whatcom are subject to inland flooding. Flooding may cause disruption to roads such as Roeder Avenue. Flooding due to increasingly intense precipitation events (atmospheric rivers) is predicted to also become an issue, especially when combined with potential sea level rise.

The Bellingham area is also experiencing increased marine shoreline flooding due to changes in storm patterns and precipitation intensity. These conditions are expected to worsen as sea level rise progresses in the next few decades.

As temperatures increase, and drought conditions intensify, it is expected that severe wildfires in the Pacific Northwest will increase. Bellingham has approximately 16,000 homes, as designated by the Washington Department of Natural Resources, within the Wildland Urban Interface and therefore at increased risk of involvement in wildland fires. Drier and hotter seasons may cause vegetation to die off, creating more fuel for fires. If this vegetation is not managed, then the impact of wildfires including unhealthy smoke, is likely to increase. The region including Bellingham has already experienced consecutive years of poor air quality due to smoke from local and regional wildfires. By 2050 unhealthy airborne particulate levels are predicted to increase by 160%. [2]

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Those who are unhoused and unsheltered are most vulnerable to all the above impacts of climate change and other natural disasters. In addition, our seniors and low-income residents living in older

housing that lacks adequate insulation and ventilation are especially at risk during severe heat, cold, or smoke events.

Our Assessment of Fair Housing did not find any significant concentration of low- and moderate- income households in any one area that is also uniquely at risks associated with climate change or natural disaster. One exception may be residents of manufactured home parks, which tend to be predominantly occupied by low- and moderate-income households.

In the Pacific Northwest, our traditionally mild climate means that only a small percentage of homes are equipped with air conditioning or air filtration. This includes many of our older public housing units. During extreme heat or fire events, residents have little reprieve from the heat and must be able to access public or congregate spaces where they can cool down.

The Bellingham/Whatcom County Housing Authority (BHA) has consulted with the Whatcom County Office of Emergency Management to explore possible cooling room solutions for its 3 high rise properties and potential funding sources. The City of Bellingham is committed to working with all housing grantees to ensure that they have a severe weather plan, and that low-income housing providers can ensure that residents remain indoors and safe during severe heat and smoke events. The City is also working with community organizations to provide vulnerable individuals and families access to locations with air conditioning and air filtration.

The community's challenge with substance abuse, behavioral health, homelessness, and law enforcement reforms is also a concern for low- and moderate-income households. BHA residents and program participants, especially those exiting homelessness or treatment programs, are extremely vulnerable to being taken advantage of, risking their health, their safety and ultimately their housing. High rise residents are consistently confronted by people wanting to gain access to common areas to camp, do drugs, and steal. Law enforcement is largely unable to respond, leaving BHA staff in a position of confronting and trying to remove those who wish to do harm on. In recent months, there has been an increase in assaults on staff. The BHA is focusing efforts on training and working with the police department as much as possible to prevent such incidents and protect its residents. It's also important to acknowledge the increasing use of meth and fentanyl in our community. The BHA, like all landlords, are facing increasing challenges to test and remediate units that have been contaminated. With changing rental protections, increasing notice periods, contamination levels are getting higher, requiring deeper levels of remediation, increasing the expense to rebuild, further straining limited financial resources, removing a critical housing unit for months and most importantly, potentially impacting other residents in the property. This is a growing community health problem that requires immediate attention.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Bellingham's Strategic Plan outlines the housing and community development goals and strategies to meet the priority needs with available resources. This Plan covers the period from July 1, 2023, through June 30, 2027. This Strategic Plan is aligned with the Assessment of Fair Housing, which was updated on November 23, 2022, to cover the period through June 30, 2027.

The City anticipates receiving continued federal entitlement grants through HUD in the next five years. The two entitlement grants are the Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME). The City also anticipates continuing to receive funding from local sources.

This Strategic Plan is written to meet the requirements of HUD that provides financial resources to implement the plan. It is also written to be consistent with the 2012 Housing Levy Administrative and Financial Plan, which governs the use of local Housing Levy dollars, state regulations and codes governing the use of levy, sales tax, and general fund dollars, and the City of Bellingham Council's Legacies and Strategic Commitments, which is the framework the City uses to align City commitments with needs. These guiding frameworks align well with one another, are consistent and reinforcing.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

(blank)

Table 47 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The city's Plan does not propose geographic priorities in this planning period. Our Assessment of Fair Housing did not reveal any concentrated areas which lack access to opportunity in the jurisdiction, and public comments emphasized that affordable housing is needed in all areas. With ever increasing property costs, formerly affordable neighborhoods are losing affordable housing stock to sales, redevelopment, and rental increases. It is for that reason that this Consolidated Plan will focus primarily on diversifying our affordable housing stock and on adding new affordable housing in all neighborhoods, instead of concentrating it only in neighborhoods where poverty rates are already above average.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Individuals Families with Children veterans Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Reduce cost burden
	Description	The greatest need in our community is to assist those with the lowest incomes. An estimated 80% of all households earning 50% AMI are cost burdened. The private market is unable to meet this demand without assistance. The rise in housing costs, together with historically low vacancy rates and cost-of-living inflation, makes it very difficult for low-income folks to find and affordable housing. With vacancy rates hovering around 2%, the city has a severe shortage of rental housing and homeownership options for those earning 80% AMI or less. There is a need for all methods available to reduce housing cost burden, including homeownership, new construction of permanently affordable housing, subsidized rental housing, and preservation of existing affordable housing. This also includes researching and fostering more creative solutions for shared-equity housing, including shared equity cooperatives and resident-owned manufactured home parks.
	Basis for Relative Priority	The need for more affordable housing of all types is the highest priority because it exacerbates needs for other programs and services.

2	Priority Need Name	Housing services
	Priority Level	High
	Population	Extremely Low Low Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Provide services to remain stably housed
	Description	While housing cost is a major factor, many households are also homeless or at risk of losing their housing due to reasons including chemical dependency, mental health issues, and domestic violence. Nearly half of homeless households in need of assistance (on the Housing Pool) could benefit from permanent supportive housing. Many more have other complex behavioral needs beyond housing alone. Our community is learning that we must also include housing services to keep the most vulnerable households and individuals stably housed.
	Basis for Relative Priority	Housing alone is inadequate for those with special needs; it often must be coupled with specialized supports

3	Priority Need Name	Basic needs
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children veterans Persons with HIV/AIDS Elderly Frail Elderly
	Geographic Areas Affected	
	Associated Goals	Help meet basic needs (other than housing)
	Description	Help to fill gaps in basic needs to low-income persons and households, such as food, hygiene, and childcare. In addition, there are other basic needs such as literacy, job, training, and social connection for special needs populations that tend to be isolated. In many cases, community facilities (like senior and childcare centers) are where people receive these services and get their basic needs met.
	Basis for Relative Priority	With housing costs continuing to rise, it leaves low-income and even moderate-income households with less money for other necessities, like food, clothing, childcare, hygiene, and transportation. Many service providers of basic needs are seeing an increase in need.
4	Priority Need Name	Safe shelter
	Priority Level	High

	Population	Extremely Low Low Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Increase safety for vulnerable populations
	Description	With homelessness continually on the rise, the Whatcom County housing service providers have had to prioritize housing and services for the most vulnerable populations: families with children, seniors, and those who are medically fragile. That leaves many other individuals unhoused and in need of basic shelter. Especially as climate change is making severe weather events more common, the city is committed to the goal anyone who needs emergency shelter can find at least a safe bed for the night. Our community currently lacks shelter options that are suitable for many groups, especially families with children.
	Basis for Relative Priority	Having a place to shelter, especially during severe weather events, is a public health need
5	Priority Need Name	Fair Housing education and enforcement
	Priority Level	High

	Population	Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents
	Geographic Areas Affected	
	Associated Goals	Prevent discrimination and increase protections
	Description	With a tight housing market and low vacancy rate, it is important to make sure that property owners and tenants are aware of their rights and responsibilities, and are abiding by all local, state, and federal laws. This need incorporates two goals from our Assessment of Fair Housing: • Support people who face housing discrimination by examining where the city may add additional supports or protections. • Provide education on Fair Housing to property managers and owners, as well as tenants, to increase public understanding of Fair Housing laws.
	Basis for Relative Priority	The city has a role to play in educating the community and collaborating with other agencies who are involved with the rental market.

Narrative (Optional)

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Market rents, vacancy rates, available units
TBRA for Non-Homeless Special Needs	Market rents, vacancy rates, available units, capacity of supportive services
New Unit Production	Construction costs, land availability, tax credit priorities, financing
Rehabilitation	Available contractors, financing
Acquisition, including preservation	Land availability, financing

Table 49 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The projection of resources over 5 years assumes relative stability of funding, including HUD CDBG and HOME, as well as local dollars that are used to match and supplement those resources.

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	808,663	210,000	800,000	1,818,663	4,074,652	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	647,380	120,000	0	767,380	3,069,520	Funds used for homebuyer assistance, tenant-based rental assistance, housing development (including CHDOs) and administration.
Other	public - federal	Admin and Planning Public Services TBRA	325,000	0	0	325,000	1,675,000	Funds used according to the HOME-ARP allocation plan

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	7,000,000	0	0	7,000,000	28,000,000	The City of Bellingham has a housing levy and sales tax that support development and preservation of housing, as well as rental assistance and housing services.
Other	public - local	Admin and Planning Public Services	500,000	0	0	500,000	2,000,000	This is the city's investment in housing, human and social services.

Table 50 - Anticipated Resources

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

For every dollar of federal funds the City expended on activities that were completed, the City typically leverages at least \$8 of non-federal funds. Leveraging is expected to be higher for larger construction projects that utilize significant private and state resources and the federal low-income housing tax credit program. Human (public) service grants leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical services to our community.

Bellingham voters have twice approved a Housing Levy that currently assesses \$4 million per year to address housing development/preservation and housing services, and the City also brings in an additional \$7 million per year with an affordable housing sales tax. These funds are used to help support capital costs, rent and services for some federally funded projects, thus contributing to the matching requirements. The Housing Levy continues through the end of 2028. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community.

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

The City has an analysis of underutilized land owned by the jurisdiction which is in play as we move forward with agency partnerships to implement the plan. Several of these parcels have been utilized for affordable housing in the past, and the City continues to look for additional strategic land acquisitions and creative partnerships to create future affordable housing opportunities.

Discussion

City funding for most housing projects typically includes other funds to complete a project. Nonprofit housing developers have been successful in obtaining Washington State Housing Trust Fund allocations and Low-Income Housing Tax Credit investments. The City's funding has been successful at leveraging significant non-federal sources.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Bellingham	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities public services	Jurisdiction
BELLINGHAM HOUSING AUTHORITY	PHA	Homelessness Non-homeless special needs Planning Public Housing Rental	Region
Whatcom County Health Department	Government	Homelessness Non-homeless special needs public facilities public services	Region
OPPORTUNITY COUNCIL	CHDO	Homelessness Non-homeless special needs Planning Rental public services	Region
KULSHAN COMMUNITY LAND TRUST	CHDO	Ownership	Region
Catholic Housing Services of Western Washington	Non-profit organizations	Homelessness Non-homeless special needs Rental	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Mercy Housing Northwest	CHDO	Homelessness Non-homeless special needs Rental	Region
Low Income Housing Institute	Non-profit organizations	Homelessness	Region

Table 51 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Strengths Service Delivery:

- Strong collaborative partnerships among funders (City and County), health care providers and with law enforcement
- Centralized, coordination of providers and their services
- Ability to manage and report comprehensive data (especially HMIS), including outcomes data that attract and leverage funds
- Comprehensive primary care and wrap-around services
- Continuum of care and care coordination (primary care, hospital, supportive services organizations)
- Strong client support/advocacy organization

Gaps of Service Delivery:

- Insufficient subsidized and affordable housing units and rental subsidy, especially for extremely low-income families, seniors, and people with physical disabilities
- Insufficient program openings for families with children in crisis (shelter, interim, and permanent housing programs), resulting in compounding trauma and significant downstream societal impacts
- Insufficient case management support, households must be prioritized by most vulnerable first
- Individual service providers have limited capacity and workforce challenges
- Not enough permanent supportive housing, long-term care, or assisted living, especially for people who are chronically homeless or medically fragile
- Homeless and runaway youth must get parent permission to utilize emergency shelter
- There is a need to grow the intensive case management system that offers coordination between health care systems, emergency services, criminal justice, and housing to respond quickly to vulnerable people who are frequent users of emergency services
- Transportation options for clients

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	
Transportation	X		
Other			
	X		

Table 52 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Bellingham Planning & Community Development Department is responsible for the planning, development, and implementation of the CDBG and HOME Programs, along with the local housing levy and affordable housing sales tax. The network of institutions through which housing and community development programs are carried out in the city is broad-based, and includes private industry, non-profit organizations, and public institutions.

The city partners with many smaller agencies, in addition to those listed above; the following are agencies the City is likely to provide funding or other partnership to in order to carry out the delivery of the projects:

- Domestic Violence and Sexual Assault Services, Nonprofit
- Interfaith Coalition, Nonprofit

- Lighthouse Mission Ministries, Nonprofit
- Lydia Place, Nonprofit
- Northwest Youth Services, Nonprofit
- Pioneer Human Services, Nonprofit
- Road2Home, Nonprofit
- Sean Humphrey House, Nonprofit
- Sun Community Services, Nonprofit
- YWCA, Nonprofit

Human services are delivered to people experiencing homelessness through a network of governmental and nonprofit agencies throughout the community. The Homeless Service Center (HSC), a program of the Opportunity Council, operates a centralized and coordinated 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.

The needs are not being adequately met, even with the strong partner agencies in the community. Especially with regard to families with young children who are homeless either by the HUD or McKinney-Vento definition, the needs are rising tremendously, and the upstream impacts are dramatic. For this reason, families with children are a preferential population going into this next Consolidated Planning period, and we must work with these partners to better meet their needs.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

Counseling and advocacy—People who are homeless or at risk of becoming homeless enter the housing system and are assigned case management from an array of partnering, non-profit housing agencies. More general counseling and advocacy services are also available to low-income people at the Community Resource Center.

Rental assistance—The HSC administers rental subsidies (local funds) to homeless and at-risk households and matches the subsidy with case management provided by themselves or another nonprofit housing agency. Families with children, youth, seniors, and veteran households are among the populations that are supported by rental subsidies and case management. Additionally, the HSC administers Supportive Housing Program subsidies to people who are chronically homeless, and diversion services to help prevent homelessness.

Law Enforcement and Paramedics—Bellingham’s Police Department, as many throughout the State and nation, is struggling with retirements far outpacing recruitment efforts. Fewer people are choosing this

field as a career path. As a result, many of the special teams, such as neighborhood police officers, are not filled at this time.

Healthcare—Healthcare services for people who are homeless are coordinated through two local community health centers, Unity Care Northwest, PeaceHealth St. Joseph Medical Center social workers.

Mobile clinics—SeaMar and Unity Care Northwest work in partnership with agencies serving the homeless to provide medical care, including on-site medical care services are available at the Lighthouse Mission Drop-In Center one day per week. The Project Homeless Connect event brings in mobile dental clinics once a year for homeless and low-income people to receive free dental services.

Outreach Services—The City supports the Homeless Outreach Team that operates out of the HSC. This is a team that regularly is on the street and in camps interacting with people experiencing homelessness. The team provides referrals and assistance and are experts in the variety of services available locally. Bellingham has a variety of other outreach services targeting the homeless population: Homeless Disability Benefits Advocacy Program, Drop-In Center run by Lighthouse Mission, a Compass Health Mobile Outreach Team, and several meal programs.

Alcohol, Drug Abuse & Mental Health Counseling—Whatcom County Behavioral Health Access Program is targeted to low-income residents and are available to homeless individuals. There are also mental health specialists assigned to work with homeless and formerly homeless persons at Francis Place, City Gate Apartments and at the Northwest Youth Services youth shelter.

Child Care—Opportunity Council operates an Information and Referral service for licensed day care providers and provides day care vouchers to homeless families. In addition, in November 2022, Whatcom County passed a levy for families and children. The new property tax will collect an estimated \$10 million per year for childcare, preschool education, and related programs, although the exact details of programs to be funded are still unknown.

Employment and Training—The following are just some of the programs and employment and job training programs that serve people who are homeless in Bellingham: WorkSource One-Stop Center, OC employment specialist, Lake Whatcom Treatment Center and Compass Health employment specialists, Northwest Youth Services jobs training, and Department of Vocational Rehabilitation.

Transportation—Whatcom Transportation Authority provides nonprofit social service providers free and discounted bus tokens and passes for their homeless clients.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Reduce cost burden	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing	CDBG: \$5,689,583 HOME: \$3,552,862 Gen Fund: \$9,312,658 Levy + Sales Tax: \$20,766,038	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 25 Household Housing Unit Homeowner Housing Added: 18 Household Housing Unit Homeowner Housing Rehabilitated: 110 Household Housing Unit Direct Financial Assistance to Homebuyers: 30 Households Assisted
2	Provide services to remain stably housed	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs		Housing services	HOME: \$207,300 Gen Fund: \$155,645 HOME-ARP: \$325,000 Levy + Sales Tax: \$2,048,206	Public service activities for Low/Moderate Income Housing Benefit: 880 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 285 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Help meet basic needs (other than housing)	2023	2027	Homeless Non-Homeless Special Needs Non-Housing Community Development		Basic needs		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 420 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 22700 Persons Assisted
4	Increase safety for vulnerable populations	2023	2027	Homeless Non-Housing Community Development		Safe shelter	Gen Fund: \$885,199 Levy + Sales Tax: \$787,254	Public service activities other than Low/Moderate Income Housing Benefit: 2765 Persons Assisted Homeless Person Overnight Shelter: 250 Persons Assisted
5	Prevent discrimination and increase protections	2023	2027	Advocacy and Service Delivery		Fair Housing education and enforcement	CDBG: \$203,732 HOME: \$76,738 Gen Fund: \$200,000 Levy + Sales Tax: \$520,000	Other: 1 Other

Table 53 – Goals Summary

Goal Descriptions

Consolidated Plan

BELLINGHAM

117

1	Goal Name	Reduce cost burden
	Goal Description	The greatest need in our community is to assist those with the lowest incomes with housing. 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 goal includes the construction of new low-income rental housing, rehabilitation of owner-occupied and rental housing for low-income residents, and supporting down payment assistance and new homeownership opportunities.
2	Goal Name	Provide services to remain stably housed
	Goal Description	Many households need more than a housing unit to maintain their housing stability. Support navigation programs for households vulnerable to homelessness, as well as rental assistance, case management, and homeless prevention and diversion programs.
3	Goal Name	Help meet basic needs (other than housing)
	Goal Description	Support the ability of households to address their non-housing basic needs and services such as through food security, childcare, literacy, violence-prevention, health and disability services, and senior assistance programs.
4	Goal Name	Increase safety for vulnerable populations
	Goal Description	Support day and nighttime assistance for very vulnerable populations including through the provision of shelter, behavioral health, hygiene and service day centers. Improve resiliency and disaster preparedness.
5	Goal Name	Prevent discrimination and increase protections
	Goal Description	Education and administration funding. This includes public education on Fair Housing and housing issues, outreach to funding decision-makers and policy makers. This includes administration of all funding programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

A total of 380 affordable housing units are estimated for the five-year period of this Strategic Plan. The housing would be provided to the following income targets:

- Extremely low-income (<30% AMI): 114 units (30% of total)
- Very Low-income (>30% and <=50% AMI): 213 units (56% of total)
- Low-income (>50% and <=80% AMI): 53 units (14% of total)

It is estimated that 87% of the housing funding would be allocated to rental housing units, of which 35% would go to extremely low-income, 56% to low-income and 9% to moderate-income.

Assistance for homeowners would have 100% benefit low-income.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A

Activities to Increase Resident Involvements

The Bellingham Housing Authority (BHA) created an agency-wide strategic plan in 2019. Two significant components of that plan were focused on improving customer access and ease of use to BHA-provided programs, and providing greater support in helping current participants maintain their housing opportunities. As a result, the BHA restructured their housing programs team, and launched the following new initiatives:

- An online applicant portal to provide easy access to apply for housing programs.
- An online participant portal to provide a convenient way to communicate with staff, complete program recertifications, request maintenance work orders, etc.
- An electronic rental payment system.
- Restructured the housing programs teams, focusing in three key areas: eligibility, compliance, and property management, to provide increased expertise and participant support in each respective area.
- Improved collaboration, information sharing, and partnership with the resident council and program participants.

In January 2023, the BHA hired two Property Managers who work directly with BHA public housing residents. Part of their duties is to engage residents through a variety of methods (office hours, educational trainings, informational meetings, newsletters, social gatherings, etc.) to increase resident involvement in their community.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

N/A

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, and wages are not increasing proportionate to housing costs. As in many cities, the high percentage of single-family zoning relative to the total land area is quite high, leaving little variation of housing types outside of downtown and urban villages. Meanwhile, most of our historic neighborhoods contain duplexes, small apartment buildings, and other multi-family housing types that continue to provide more affordable housing options.

Market-price residential investment is already incentivized in the private market through a healthy demand. The City currently encourages private investment in affordable housing by offering a 12-year tax reduction incentive to developers that build multi-family housing which is affordable to households whose income is at or below 60% of the Area Median Income (AMI). The affordable housing requirement can also be met, either partially or fully, for any units with two or more bedrooms that are available to households whose income is at or below 80% of median family income adjusted for family size. However, this tax incentive has not been utilized because there is another exemption that requires no affordable housing component and grants an 8-year tax exemption.

Policies which may have a negative effect on affordable housing are those which limit supply of new units: for example, zoning requirements, such as single-family zoning, minimum lot size requirements, and restrictions on infill development. Currently, 42% of the City's total land area is zoned for single-family residential use, compared to 14% which is zoned for multi-family residential use.[1] This zoning puts constraints on where more affordable multi-family housing units are permitted.

Other local public policy that limits the supply of available land is our relatively high percentage of greenspace and park lands. Bellingham voters cherish their parks and land conservation is a strong value for many residents. This makes Bellingham a beautiful place to live, with many opportunities for outdoor recreation and enjoyment. It also limits the amount of land that is available for development.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Based on our Assessment of Fair Housing, data analysis, and robust public feedback, the City proposes the following strategies to remove or ameliorate barriers to affordable housing:

- Support the acquisition, preservation, and development of housing units affordable for low-income residents
- Maintain the City's proactive role in affordable housing development
- Support homeownership for low to moderate income households, especially for minority households and households with young children

- Foster creative solutions for alternative ownership models, including through shared equity, resident-owned communities, and cooperative housing
- Offer rental assistance for vulnerable households, prioritizing homeless families with children and medically fragile seniors, as well as severely cost burdened families with young children
- Promote mixed income neighborhoods
- Offer home rehabilitation loans with favorable terms for low-income homeowners – especially for those who are elderly or disabled

SP-60 Homelessness Strategy – 91.215(d)

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

The Whatcom County Department of Health & Community Services is the lead agency for the homelessness strategy and continuum of care in our community. The City's plans support these strategies.

The city-funded Homeless Outreach Team (HOT) has continued to operate and be an invaluable resource to the community and unsheltered population. Their focus is on reaching out specifically to unsheltered persons to build relationships and align them with services and housing, based on the specific needs of each individual. HOT conducts outreach five days per week, including outreach to homeless encampments.

The City also supports the Ground Floor, an outreach location run by Northwest Youth Services targeted at reaching homeless youth and connecting them to housing and services. The Ground Floor served 352 unduplicated youth, and provided over 3,000 distinct services per year.

Addressing the emergency and transitional housing needs of homeless persons

The City of Bellingham continues to be active on workgroups and task forces to collaborate with regional agencies, the county, local non-profits, and the faith community to address the need for emergency shelter and transitional housing.

The City continues to fund emergency winter motel stays through nonprofits serving homeless families and chronically homeless persons, including supporting this year-round. The City also now supports an established tiny house village in collaboration with the Low Income Housing Institute and Road2Home (a local nonprofit) that provides 35 tiny houses and serves up to 50 individuals (individuals and couples). In addition to this new capacity, the following are still operational in this community:

- YWCA 9 alcove beds + 5 additional emergency beds for senior women;
- Sun House 9 beds;
- NWYS PAD shelter for youth up to 12 beds;
- Lighthouse Mission 'Base Camp' 200 beds + 30 overflow beds in winter;
- Interfaith Coalition 4 family units;
- DVSAS 47 individuals fleeing domestic violence;
- HomesNOW 45 beds in tiny house villages (on City property)

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 City of Bellingham and our partners are committed to a housing-first model and prioritize homelessness prevention for families. The City funds multiple programs focused on helping vulnerable individuals and families avoid becoming homeless, such as Lydia Place, Northwest Youth Services, and the Bellingham Housing Authority. With the City's support, Northwest Youth Services continues to operate a low-barrier day shelter where youth can access services and complete intake assessments to become eligible for housing programs, as well as an interim facility for underage youth.

The county operates a coordinated entry system for households who are already homeless. The City helps to fund this system through support of the Homeless Service Center, along with several service activities and rental assistance programs which help individuals and families avoid becoming homeless, including continued funding for the Housing Lab program. This service is a resource for households whose vulnerability is not high enough for them to qualify for full case management services, but who still struggle to find housing in the tight rental market.

While all of these have had challenges maintaining services and supporting and keeping staff through the pandemic, they have all adapted and are still able to serve the community. Our biggest issue is a lack of housing units available for all who need them, and secondly, a shortage of housing case managers, mental health counselors, and other staff trained to support these households.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City helps fund several transitional housing and shelter programs, as well as the Homeless Outreach Team (mentioned earlier). Each have an expectation to help as many persons as possible transition to permanent housing and independent living. However, the numbers of those in need – especially families with children – continue to grow at a rate that outpaces our community's capacity to assist all who need help.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

Since 2001, 273 low-income homes have been rehabilitated under the Home Rehab Loan Program, run by the City of Bellingham. Many of these homes required lead-based paint stabilization. As part of our Strategic Plan, building new affordable housing and acquiring and refurbishing existing affordable housing will further increase access to housing which is free from LBP. Since 2018, 43 income-qualified households were rehabilitated through the Home Rehab Program. Of those, 18 (42%) required lead paint stabilization to HUD standards.

Tenant-based rental assistance units built before 1978 and funded by the city are given a visual assessment for lead-based paint. Any deteriorated/flaking paint is required to be stabilized prior to renting to households with children under 6 years of age. Multifamily properties funded with HUD funds are routinely monitored. Those properties built before 1978 are visually assessed for deteriorated paint. All lead-painted surfaces with deteriorated paint are required to have the paint stabilized.

How are the actions listed above related to the extent of lead poisoning and hazards?

We estimate there are 2,100 households in Bellingham that are at risk of lead-based paint because of the age of housing and presence of young children (minus the number that have participated in the Home Rehab Program since its inception). The actions listed above greatly reduce the potential for lead poisoning by requiring stabilization of lead painted surfaces.

How are the actions listed above integrated into housing policies and procedures?

The city plans to continue the Home Rehab Program, which will provide an opportunity for low-income, owner households to address LBP hazards. This program will continue to provide opportunities for income-qualified households to rehabilitate their houses. Houses built before 1978 will continue to be required to have a lead paint risk assessment performed. Deteriorated lead-painted surfaces will be required to be stabilized to HUD standards. City funds pay for the lead risk assessment and clearance testing through a “Hazardous Materials” grant. Other multi-family units built before 1978 that receive federal assistance will be required to have deteriorated lead-based painted surfaces stabilized to help maintain a safe and healthy living environment.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to the 2021 5-year ACS, there are 16,946 people in Bellingham who live below the Federal poverty level – or about 20% of the population. Over half (55%) of those whose incomes are below the poverty level are in the 18-24 age group, and are likely to be majority college students. Still, that leaves many other seniors and families who are also living below the Federal poverty level, including over 2,000 children.

An anti-poverty strategy requires coordination between agencies and service providers at many levels. While the City of Bellingham is not the lead agency for homelessness, social services, economic development or training, it does provide a critical role in addressing the cycle of poverty within our community through the many programs and services we support.

The Whatcom Asset Building Coalition (WABC -- <http://www.whatcomabc.org>) is a community collaboration supporting financial self-sufficiency through education and advocacy. The is a longtime funder of the Whatcom Literacy Council's "Gaining Jobs & Self Sufficiency Through Literacy" program, which helps break the cycle of poverty by teaming English language learners and illiterate adults with trained volunteers to work on their educational and career goals. Housing case management services provided by other organizations also include help with budgeting, credit repair, and financial management skills. Other case management services may include help with longer-term goal setting around employment or education.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Bellingham's main role in reducing poverty is to ensure more households obtain housing that is affordable to enable them to save money and reach their financial and personal goals. The City's Planning & Community Development staff coordinate regularly with other service providers who are focused on economic development, and other city departments that focus on equitable access to services and opportunities.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Bellingham executes funding agreements (“contracts”) for all its CDBG and HOME activities, as well as activities carried out with Levy, City General Funds, or combination funding. These contracts meet all the applicable program and federal requirements. The City monitors contracts for compliance with these program requirements, including general management, performance goals, financial management, data collection and reporting, eligibility determinations, nondiscrimination, fair housing, affirmative marketing, labor compliance, etc.

The City has adopted HOME monitoring procedures to ensure that HOME funds are used consistent with the program requirements. The monitoring objectives are:

- Ensure compliance with HOME and other regulations,
- Ensure production and accountability,
- Provide a basis for program and project performance evaluations,
- Increase communication between the City and Subrecipients, and
- Improve program designs and processes.

The HOME monitoring includes project-based risk assessment, as well as required property and record inspections. Annual monitoring of Tenant-Based Rental Assistance is required by HOME rules, and is implemented by the City.

The City also conducts monitoring of its CDBG and locally-funded activities, which varies depending on the activity. Construction or acquisition projects are monitored as they progress in order to ensure compliance with specific applicable requirements, including Davis-Bacon, Section 3, NEPA, and Uniform Relocation and Acquisition requirements. Funds that are used for public (human) service activities are monitored using a risk-based assessment system. The objective of this monitoring is similar to the HOME objectives, with particular emphasis on income screening, performance reports, records and financial management systems.

The City works in coordination with the state and county when the same programs or projects are funded by these agencies to coordinate and improve systems for the monitoring agencies and the agencies being monitored.

The City also uses the Consolidated Annual Performance and Evaluation Report (CAPER) as a tool for monitoring the City's performance against Consolidated Plan goals.

Expected Resources

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

Introduction

The projection of resources over 5 years assumes relative stability of funding, including HUD CDBG and HOME, as well as local dollars that are used to match and supplement those resources.

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	808,663	210,000	800,000	1,818,663	4,074,652	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	647,380	120,000	0	767,380	3,069,520	Funds used for homebuyer assistance, tenant-based rental assistance, housing development (including CHDOs) and administration.
Other	public - federal	Admin and Planning Public Services TBRA	325,000	0	0	325,000	1,675,000	Funds used according to the HOME-ARP allocation plan

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	7,000,000	0	0	7,000,000	28,000,000	The City of Bellingham has a housing levy and sales tax that support development and preservation of housing, as well as rental assistance and housing services.
Other	public - local	Admin and Planning Public Services	500,000	0	0	500,000	2,000,000	This is the city's investment in housing, human and social services.

Table 54 - 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

For every dollar of federal funds the City expended on activities that were completed, the City typically leverages at least \$8 of non-federal

funds. Leveraging is expected to be higher for larger construction projects that utilize significant private and state resources and the federal low-income housing tax credit program. Human (public) service grants leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical services to our community.

Bellingham voters have twice approved a Housing Levy that currently assesses \$4 million per year to address housing development/preservation and housing services, and the City also brings in an additional \$7 million per year with an affordable housing sales tax. These funds are used to help support capital costs, rent and services for some federally funded projects, thus contributing to the matching requirements. The Housing Levy continues through the end of 2028. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community.

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

The City has an analysis of underutilized land owned by the jurisdiction which is in play as we move forward with agency partnerships to implement the plan. Several of these parcels have been utilized for affordable housing in the past, and the City continues to look for additional strategic land acquisitions and creative partnerships to create future affordable housing opportunities.

Discussion

City funding for most housing projects typically includes other funds to complete a project. Nonprofit housing developers have been successful in obtaining Washington State Housing Trust Fund allocations and Low-Income Housing Tax Credit investments. The City's funding has been successful at leveraging significant non-federal sources.

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	Reduce cost burden	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs		Affordable Housing	CDBG: \$1,012,132 HOME: \$343,342 Gen Fund: \$1,942,572 Levy + Sales Tax: \$4,457,552	Rental units constructed: 60 Household Housing Unit Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Rehabilitated: 22 Household Housing Unit Direct Financial Assistance to Homebuyers: 6 Households Assisted
2	Provide services to remain stably housed	2023	2027	Affordable Housing Homeless Non-Homeless Special Needs		Housing services	HOME: \$207,300 Gen Fund: \$155,645 HOME-ARP: \$325,000 Levy + Sales Tax: \$2,048,206	Public service activities for Low/Moderate Income Housing Benefit: 176 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 57 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Help meet basic needs (other than housing)	2023	2027	Homeless Non-Homeless Special Needs Non-Housing Community Development		Basic needs	CDBG: \$602,799 Gen Fund: \$2,525,156	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 84 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 4540 Persons Assisted
4	Increase safety for vulnerable populations	2023	2027	Homeless Non-Housing Community Development		Safe shelter	Gen Fund: \$885,199 Levy + Sales Tax: \$787,254	Public service activities other than Low/Moderate Income Housing Benefit: 553 Persons Assisted Homeless Person Overnight Shelter: 50 Persons Assisted
5	Prevent discrimination and increase protections	2023	2027	Advocacy and Service Delivery		Fair Housing education and enforcement	CDBG: \$203,732 HOME: \$76,738 Gen Fund: \$200,000 Levy + Sales Tax: \$520,000	Other: 1 Other

Table 55 – Goals Summary

Goal Descriptions

1	Goal Name	Reduce cost burden
	Goal Description	The greatest need in our community is to assist those with the lowest incomes with housing. 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 goal includes the construction of new low-income rental housing, rehabilitation of owner-occupied and rental housing for low-income residents, and supporting down payment assistance and new homeownership opportunities.
2	Goal Name	Provide services to remain stably housed
	Goal Description	Services provided under this goal are intended for vulnerable households, primarily those who belong to a priority population. Many households need more than a unit to maintain their housing stability. Support navigation programs for households vulnerable to homelessness, as well as rental assistance, case management, and homeless prevention and diversion programs.
3	Goal Name	Help meet basic needs (other than housing)
	Goal Description	Support the ability of households to address their non-housing basic needs and services such as through food security, childcare, literacy, violence-prevention, health and disability services, and senior assistance programs.
4	Goal Name	Increase safety for vulnerable populations
	Goal Description	Support day and nighttime assistance for very vulnerable populations including through the provision of shelter, outreach, behavioral health, hygiene and service day centers. Improve climate resiliency and disaster preparedness.
5	Goal Name	Prevent discrimination and increase protections
	Goal Description	Education and administration funding. This includes public education on Fair Housing and housing issues, outreach to funding decision-makers and policymakers, and technical assistance and capacity-building for local organizations. This includes administration of all funding programs.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2023 Action Plan includes continuation of existing activities, renewal of ongoing activities, and new projects.

In 2022, the City solicited new proposals for public service activities with the intent to fund them for 2 years and will continue to fund these activities through 2023 provided adequate funds are allocated.

Staff have attended trainings pertaining to the Build America, Buy America Act and will ensure that iron, steel, manufactured products, and construction materials used in applicable housing projects funded by Federal financial assistance to be produced in the United States. Staff anticipate that this will apply to some of the acquisition and development projects described below.

Projects

#	Project Name

Table 56 – Project Information

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

AP-38 Project Summary

Project Summary Information

N o.	Project	Goals Supported	Geogra phic Areas	Needs Addressed	Funding
1	Rental and Interim Housing Development	Reduce cost burden		Affordable Housing	CDBG : \$592,132 HOME : \$408,342 Other - Levy + Sales Tax : \$3,756,656 Other - Gen Fund : \$1,942,572
	Description	Development or acquisition (w/w/out rehab) of rental/interim housing to add to the subsidized housing inventory in Bellingham.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Close to 100 households will benefit from these programs, representing a mix of families with children, seniors, disabled, and general low-income households.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites			
	Planned Activities (additional information for this discussion may be available on	Acquisition of land for, and development of new rental/interim housing units for low-income families, as well as acquisition of existing (non-subsidized) rental/interim housing for low-income families.			

	the AP-36 Project Detail screen)				
2	Homebuyer and Homeownership Development	Reduce cost burden		Affordable Housing	HOME : \$75,000 Other - Levy + Sales Tax : \$540,000
	Description	This program supports the downpayment assistance provided in partnership with the WA State Housing Finance Commission, and supports the development of new ownership housing, all for low-income homebuyers.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	About a dozen low-income households will benefit from this program.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The City will continue to partner with the WA State Housing Finance Commission and Kulshan Community Land Trust on the downpayment assist options available through conventional lenders and KCLT, as well as support the development on new homeownership housing in the Birchwood neighborhood.			
3	Housing Rehab and Repair	Reduce cost burden		Affordable Housing	CDBG : \$420,000 Other - Levy + Sales Tax : \$270,000

	Description	Rehabilitation and repair of existing housing.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Approximately 16 low-income households will benefit from the rehab and repair of existing homes.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Housing rehab program will help low-income homeowners and seniors/disabled with health and safety repairs. Manufactured home repair program will help low-income owners of manufactured housing units with health and safety repairs (partnership between City and Opportunity Council). Rental housing repair will provide emergency assistance to nonprofit rental housing owners with needed health and safety repairs.			
4	Housing Services	Provide services to remain stably housed		Housing services	HOME : \$207,300 Other - Levy + Sales Tax : \$2,048,206 Other - Gen Fund : \$155,645 Other - HOME-ARP : \$325,000
	Description	This is the City's Housing Services program for low-income households to help with housing			

	stability, including a variety of services in permanent housing and permanent supportive housing, as well as tenant based rental assistance and rapid rehousing case management, and prevention/diversion.
Target Date for Completion	06/30/2024
Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Over 200 low-income households will be supported with case management and other services.
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Francis Place Housing Services (PSH) Sun - Gregg's & Nevada Housing Services (PSH) 22 North Housing Services (PSH) Lydia Place - Heart House (PSH) Gardenview Tiny House Village (Shelter) WDRC - Housing Stability Program HSC - Housing Lab program

		Lydia Place - Family Services Program OC - Prevention & Diversion for Families & Seniors OC - Rapid Re-Housing for Families NWYS - Transitional Living Program NWYS - PAD Program DVSAS - Safe Shelter YWCA - Larrabee Residence			
5	Human and Social Services	Help meet basic needs (other than housing)		Basic needs	CDBG : \$152,799 Other - Gen Fund : \$1,592,000
	Description	This is the City's program to provide for basic needs to low-income residents.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Over 4,500 low-income individuals will benefit from the services provided			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites			

	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Lydia - Mental Health Counseling BFB - Free Grocery Program DVSAS - Safe Start Program NWYS - Education & Employment OC - Volunteer Chore Program NWYS - Teen Court WLC - Gaining Jobs & Improving Self-Sufficiency Through Literacy BCFSC - Target Intensive Case Management Max Higbee Center Weekday Program OC - Maple Alley Inn WCOA - Meals on Wheels Bellingham Rebound Roots SHH - Residential Services for Adults Living with AIDS MNW - Senior Support Services BPS Carl Cozier Family Resource Center GRACE program
--	--	--

		Childcare workforce stabilization			
		Food security			
6	Shelter and Outreach	Increase safety for vulnerable populations		Safe shelter	Other - Levy + Sales Tax : \$787,254 Other - Gen Fund : \$885,199
	Description	Support day and night-time assistance for very vulnerable populations including through the provision of shelter, outreach services, hygiene and service day centers.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	About 600 very low-income households will be assisted through this program, most with very high vulnerability.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites Gardenview Tiny House Village (Lakeway Dr)			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	This program supports the provision of shelter through the Gardenview Tiny House Village, as well as the provision of day-time services through the Homeless Service Center, Homeless Outreach Team, and Ground Floor (day center for youth).			
7	Community Facilities and Improvements	Help meet basic needs (other than housing)		Basic needs	CDBG : \$450,000 Other - Gen Fund :

					\$933,156
	Description	This programs helps nonprofit organizations with facilities acquisition and improvement for those that serve low-income residents.			
	Target Date for Completion	06/30/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Approximately 120 low-income households will benefit from new or improved community facilities.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Scattered sites			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The City will assist nonprofits who provide services to low-income residents with facility acquisition and improvements, including childcare providers.			
8	Administration and Assistance	Prevent discrimination and increase protections		Fair Housing education and enforcement	CDBG : \$203,732 HOME : \$76,738 Other - Levy + Sales Tax : \$520,000 Other - Gen Fund : \$200,000
	Description	This program supports the administrative needs of the division, including supporting fair housing education and providing technical assistance and capacity building support for the organizational partners who serve low-income households in the City.			

Target Date for Completion	
Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The general population benefits from these activities, including all those already counted in this plan.
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Citywide
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Provide fair housing education and support anti-discrimination in housing. Provide technical assistance and capacity-building support to nonprofit housing providers serving low-income households. Administer all housing and services programs in compliance with federal, state, and local regulations.

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

The city's Plan does not propose geographic priorities in this planning period. Our Assessment of Fair Housing did not reveal any racially or ethnically concentrated areas of poverty or areas which lack access to opportunity in the jurisdiction, and public comments emphasized that affordable housing is needed in all areas. With ever increasing property costs, formerly affordable neighborhoods are losing affordable housing stock to sales, redevelopment, and rental increases.

A strategy of this Action Plan is to promote mixed income neighborhoods throughout the jurisdiction.

Geographic Distribution

Target Area	Percentage of Funds

Table 57 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Investments will not be prioritized geographically.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	70
Non-Homeless	128
Special-Needs	6
Total	204

Table 58 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	45
The Production of New Units	136
Rehab of Existing Units	12
Acquisition of Existing Units	11
Total	204

Table 59 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

The Public Housing Authority (PHA) plans to complete a comprehensive capital needs assessment to assess the remaining useful life of building systems, prioritize needs and explore financial resources to complete the work. The PHA will continue to manage and complete projects identified in its Capital Fund plan.

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

The PHA has resumed office hours at each high rise, and over the next year will work to resume educational trainings, social gatherings, planning meetings with staff and other opportunities for feedback and engagement.

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

N/A

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

N/A

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

Introduction

The Whatcom County Department of Health & Community Services (WHCS) is the lead agency for the homelessness strategy and continuum of care in our community. The City's plans support these strategies. In 2022-2023, the City and WHCS convened a group of stakeholders and local experts to identify a strategy for better assisting families with children who are at risk of homelessness or already homeless. The group prioritized several short-term activities, which are incorporated below.

People who are homeless or at risk of becoming homeless enter the housing system and are assigned case management 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 (drop-in service center) of the Opportunity Council which offers information and referral services to help people seeking a variety of services in addition to housing services.

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

Bellingham has a variety of outreach services targeting the homeless population. Starting in 2015, the City funded a Homeless Outreach Team using 2012 Housing Levy funds; the City contracted with the Opportunity Council for these services. The City will continue to support the Homeless Outreach Team as the primary team responsible for helping engage those who are living unsheltered to make referrals and offer services. The City plans to continue funding outreach and case management activities in the 2023 Action Plan, and are working to increase funding to expand the Homeless Outreach Team's hours.

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. Examples of programs funded by this grant program include:

- Larrabee Residence (YWCA)
- Recovery House (Opportunity Council)
- Transitional Living Program (Northwest Youth Services)

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

Bellingham is seeking ways to partner with agencies to increase the number of beds available to persons living unsheltered and continues have an open door to work with any qualified partner agencies who have the experience and desire to operate emergency shelter in our community. The existing low-barrier shelter operated by the Lighthouse Mission Ministries is developing a new building at a permanent location which will accommodate a higher number of individuals and some families. Unity Care Northwest and Opportunity Council have partnered to open The Waystation in 2023, which will provide respite care for recently discharged adults who are medically fragile and unhoused, as well as health and hygiene services.

In 2021, the City contracted with the Low-Income Housing Institute and Road2Home to open a tiny house village in response to an urgent need for more non-congregate shelter, especially for seniors and medically fragile individuals and couples. Gardenview village opened with 30 units and added 5 addition units in 2022, to serve up to 50 people. The village is staffed 24/7 and participating in housing case management is a mandatory.

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 community has long been a supporter of prevention as the most effective and cost-efficient method to address homelessness. Many local programs have a prevention component, and receive City funding for that reason. Some recently funded activities to help low-income individuals and families avoid becoming homeless include or increase resiliency include:

- Rapid Rehousing and Diversion Program (Opportunity Council)
- Carl Cozier Family Resource Center (Bellingham School District)
- Vocational Readiness Program (Northwest Youth Services)
- Parent-Teen Mediation Program (Whatcom Dispute Resolution Program)

Discussion

As seen across the State, the number of homeless persons in Bellingham and Whatcom County continues to increase, as it has for the last few of years. Although the Covid-19 pandemic disrupted the annual census and added increased emergency resources to the community, in draw-down of those

additional resources (like rent payment assistance) we expect to see the number of homeless households to rise even more steeply in the next year. Partner agencies are already reporting unprecedented demand. The City is working with partners to find creative new solutions to expand capacity and boost resources around prevention wherever possible.

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

Introduction:

The City remains committed to removing or ameliorating the negative effects of public policies that serve as barriers to affordable housing. As discussed previously in section MA-40, the major barriers to affordable housing in the jurisdiction are driven by market forces: demand for housing exceeds supply, rents and property values are rising, and wages are not increasing proportionate to housing costs. As in many cities, the high percentage of single-family zoning relative to the total land area is quite high, leaving little variation of housing types outside of downtown and urban villages. Historic policy decisions related to neighborhood covenants, discriminatory financing, and single-family zoning have resulted in a disproportionately low percentage of homeowners who are non-White and Hispanic. Bellingham still sees the effects of these policies today.

In addition, residents of Low-Income Tax Credit properties who are on a fixed income (such as seniors and those with disabilities) are still facing cost burden even though they reside in a subsidized unit. The city proposes to take several steps, are described below.

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

Bellingham has taken many steps since the previous Consolidated Plan to attempt to update zoning and incentivize a greater variety of housing options for residents of all incomes. One key strategy to keeping public costs down while increasing housing options is to build infill and multi-family housing in areas of the city which already have services and infrastructure. This includes passing an ADU ordinance and a project to increase capacity in Residential-Multifamily zones. Based on preliminary analysis of our buildable lands, utilizing ranged zoning and minimum densities in Residential Multi areas results in an overall increase of 20% in Bellingham's infill capacity. Within our developed areas, these incremental density increases through the ranged zoning system provide small-scale infill opportunities without requiring developers to purchase multiple adjacent properties. The project components aim not only to increase density, but to provide more opportunities for housing variety, affordability, and homeownership. Collectively, the project aims to support compact growth, a primary goal in both our Comprehensive Plan and Climate Action Plans.

In addition, this year's plan includes an explicit goal to increase Fair Housing education and enforcement, with intention of reducing discrimination. The City will also continue to work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.

Other public policies that have negative effects are not city policies, but rather state or federal program

policies. For example, rent control is instituted within all Low-Income Housing Tax Credit (LIHTC) properties in the form of rent restrictions tied to income levels. Despite this, residents in these properties may not have incomes that match the target income for the unit. The City is responding to this by:

- Working with LIHTC tax credit property operators to discuss criteria they use to admit tenants, encouraging less-lenience on rent-to-income ratios so that incoming residents are not significantly rent-burdened from the start, knowing that those on fixed incomes are likely to become more stretched over time as their fixed incomes may not keep pace with median income increases (and therefore likely rent increases) over time;
- Looking at changing the target income mixes for projects going forward (for example, many projects have half of the units targeted at 30% AMI, and half at 50% AMI) so that there are more income brackets (for example, 30%, 40%, 50%) or income-averaging is utilized;
- Improving communications with LIHTC property managers during the lease-up process so that residents understand these units are NOT tied to income, and are clear how rent increases may occur over time;
- Communicating with LIHTC property managers and residents about opportunities to increase their housing affordability over time, such as when Housing Authority waitlists open, when other housing units with vouchers associated may come available, or when homesharing opportunities arise; and
- Engaging City leadership in discussions about where targeted rent assistance can be most effective in the community to prevent homelessness, while acknowledging City resources are a very small fraction of the needed rent assistance resources based on severe cost burden statistics, and subsequently deploying this assistance when available.

AP-85 Other Actions – 91.220(k)

Introduction:

After carefully considering public feedback, data, and the recommendations expressed by partners and stakeholders, the projects previously described in this Action Plan will address the priority need for affordable housing, basic needs, housing services, safe shelter, and Fair Housing education and enforcement. The other actions described below are included to the degree that they also contribute to meeting one of these needs.

Actions planned to address obstacles to meeting underserved needs

Through the many community work groups with which the City is involved (including the Whatcom County Coalition to End Homelessness, Whatcom Housing Alliance, Healthy Whatcom, Child and Family Wellbeing Taskforce, Aging Well Whatcom, and the Families with Children Strategy group). The work of all these groups is in some way geared towards addressing obstacles to meeting underserved needs. The City will continue to engage and collaborate with our partners to identify and address obstacles as they arrive.

Several public comments also mentioned the need for public restrooms, where people without housing can use the toilet in a private and sanitary manner. The City has authorized the purchase of two new public restrooms (“Portland Loos”), which will be installed in the downtown district in early 2024. In the interim, additional services will be added to extend the hours at existing restroom facilities at the Commercial Street Parking Garage and Depot Market Square.

Actions planned to foster and maintain affordable housing

Our highest priority goal is to reduce cost burden, which includes many actions intended to foster and maintain affordable housing. These include:

- Support the acquisition, preservation, and development of housing units affordable for low-income residents.
- Maintain the City’s proactive role in affordable housing development.
- Support homeownership for low to moderate income households, especially for minority households and households with young children.
- Foster creative solutions for alternative ownership models, including through shared equity, resident-owned communities, and cooperative housing.
- Offer rental assistance for vulnerable households, prioritizing homeless families with children and medically fragile seniors, as well as severely cost burdened families with young children.
- Offer home rehabilitation loans with favorable terms for low-income homeowners – especially for those who are elderly or disabled.

Actions planned to reduce lead-based paint hazards

Continue the Home Rehab Program, which includes lead-based paint suppression for high-risk homes. Staff will also continue outreach to childcare centers and other opportunities to spread information about the dangers of lead-based, and resources available for mitigating those risks.

Actions planned to reduce the number of poverty-level families

Funding for programs that reduce the number of poverty-level families include literacy and job training services provided through the Whatcom Literacy Council and Opportunity Council. Other activities attempt to prevent families from falling further into poverty by providing basic needs and other supports such as through programs such as the Free Grocery Program, Childcare Tuition Assistance, and landlord/tenant mediation services through the Whatcom Dispute Resolution Center and Opportunity Council's Landlord Liaison program.

Actions planned to develop institutional structure

New strategies adopted in this plan is to help build capacity and partnerships to increase shelter spaces, as well as to address system constraints that prevent the emergency housing system from working in the most supportive and efficient way possible. The city is currently working closely with WHCS to develop specific actions, collaborating with local service providers. One early step that the City is taking is to offer technical assistance to agencies that hope to increase their internal capacity.

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

See sections SP-55, SP-60, and SP-70 for explanation of coordination between public and private housing agencies. Some of the actions recently prioritized by our stakeholders, and will be added to the Plan, are:

- To improve real-time data between funders and agencies to support proactive planning.
- Establish continuous check-ins between funders and community service providers.

Discussion:

Voters in the City of Bellingham approved a Low-income Housing Levy in 2012, and again in 2019. 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. As a result of this levy passage, significant attention is being paid to addressing obstacles, affordable housing supply, institutional structure, and coordination. If this source of funding did not continue, there would be a significant reduction in the level of housing and services the city is able to support.

Program Specific Requirements

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

Introduction:

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
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

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

None.

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:

See grantee unique appendices.

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:

See grantee unique appendices.

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:

None. N/A

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

Attachments

Citizen Participation Comments



Community Development Division
210 Lottle Street
Bellingham, Washington
(360) 778-8385

NOTICE OF PUBLIC HEARING

Notice is hereby given that the COMMUNITY DEVELOPMENT ADVISORY BOARD will hold a public hearing to take public comment on the draft 2023-2027 Consolidated Plan, including the 2023 Action Plan, for activities beginning July 1st.

When: March 9, 2023 at 6:00 pm

In-Person Location: Mayor's Board Room, City Hall, 210 Lottle Street, Bellingham, WA

Virtual Option: Zoom Webinars - Meeting ID: 986 9045 8984 / Password: 21. Links and call-in information can be found at www.cob.org/cdab.

The City seeks public comment on the draft *Consolidated Plan and 2023 Action Plan*, which will be available for review at <https://cob.org/services/planning/consolidated-plan> or at the Bellingham Central Library beginning on February 27, 2023. The *Consolidated Plan* coordinates all elements of community development – housing, neighborhood development, human services and special projects – for a unified vision for community actions. The *Action Plan* describes planned activities for 2023 which will be based on the proposed strategies and goals in the 2023-2027 Consolidated Plan.

Comments will be accepted at the public hearing, or in writing through March 31, 2023. Written comments should be sent to the Community Development Division, 210 Lottle Street, Bellingham, WA 98226.

For additional information, contact Samya Lutz, Housing & Services Program Manager at 360-778-8386.

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. With five business days notice, special accommodations will be provided. Refer any inquiries or complaints related to HUD regulations implementing Section 504 to the Housing & Services Program Manager. Contact 778-8385 (voice) or 711 (WA State Relay).

ON THE AIR

Events may be affected by late programming changes. Listings include those events broadcast via network channels and over the air.

TUESDAY

BASEBALL

MLB Baseball
Houston Astros at New York Mets. 10:00 a.m. ESPN

MLB Baseball
Cincinnati Reds at Los Angeles Dodgers. 12:00 p.m. MLB

MLB Baseball
Boston Red Sox at Miami Marlins. 3:30 p.m. MLB

BASKETBALL

College Basketball
Marquette at Butler. 3:30 p.m. FS1

College Basketball
Saint Louis at VCU. 4:00 p.m. CBSN

College Basketball
Teams TBA. 4:00 p.m. ESPN

ESPN2 College Basketball
Boston College at Wake Forest. 4:00 p.m. ESPN

College Basketball
Florida at Georgia. 4:00 p.m. SEC

NBA Basketball
Washington Wizards at Atlanta Hawks. 4:30 p.m. TNT

NBA G League Basketball
Grand Rapids Gold at Memphis Hustle. 5:00 p.m. NBA TV

College Basketball
Villanova at Seton Hall. 5:30 p.m. FS1

College Basketball
Michigan State at Nebraska. 6:00 p.m. BIGTEN

College Basketball
San Diego State at Boise State. 6:00 p.m. CBSN

College Basketball
Teams TBA. 6:00 p.m. ESPN

College Basketball
Teams TBA. 6:00 p.m. ESPN2

College Basketball
Texas A&M at Ole Miss. 6:00 p.m. ESPN

College Basketball
South Carolina at Mississippi State. 6:00 p.m. SEC

NBA Basketball
Minnesota Timberwolves at Los Angeles Clippers. 7:00 p.m. TNT

College Basketball
Fresno State at New Mexico. 7:30 p.m. FS1

College Basketball
Colorado State at San Jose State. 8:00 p.m. CBSN

GOLF
Women's College Golf
2023 Darius Buckner Intercollegiate, Second Round.
11:30 a.m. GOLF

HOCKEY
NHL Hockey
Seattle Kraken at St. Louis Blues. 5:00 p.m. RTNW

SOCCER
French Cup Soccer
Olympique Lyonnais vs. Grenoble Foot. 12:00 p.m. FS2



Chris Kirk watches his shot from the second tee during Sunday's final round of the Honda Classic in Palm Beach Gardens, Fla.

FROM PAGE 5A

KIRK

the game in May 2019 because of alcoholism and depression. He struggled with anxiety, struggled to deal with pressure, even though he had a penchant for making it seem like no big deal on the golf course — he was a four-time winner, plus made a big putt to help the U.S. win the Presidents Cup at South Korea in 2015.

The tour gave him a major medical extension for the time he missed, meaning he had a set number of tournaments to do well enough to regain his full status. He got it back by the slimmest of margins at the Sony Open in 2021.

And now he's a champion again.

"I just have so much to be thankful for," Kirk said. "I'm so grateful for my sobriety, I'm so grateful for my family, I'm so grateful for everyone that has supported throughout the past three or four years."

Tyler Duncan, ranked No. 360 in the world com-

to \$411,600. His plans for the next few weeks might be changing based on this finish.

"I've got to go book some flights and hotel rooms, swipe the credit card," said Gerard, who came into the week ranked 472nd in the world. "We'll see what happens."

Defending champion Sepp Straka (68) was in a group tied for ninth at 9 under, with all four of his rounds in the 60's. Also in that group: Shane Lowry, who had a chance to win the Honda last year and finished with an even-par 70.

"I played lovely, and I just couldn't get it going," Lowry said.

DIVOTS: It was the first playoff for both Kirk and Cole. ... Jhonattan Vegas had the round of the day with a 64, getting to 5 under. He started birdie-birdie-eagle, made a 50-footer for double bogey on the par-3 15th after his tee shot made a 36-footer for an-

Classified

classifieds.bellinghamherald.com

FIND. BUY. SELL.

SELL YOUR STUFF FAST!

360.676.2600

Legals



Community Development Division
210 Lottie Street
Bellingham, Washington
(360) 778-8385

NOTICE OF PUBLIC HEARING

Notice is hereby given that the COMMUNITY DEVELOPMENT ADVISORY BOARD will hold a public hearing to take public comment on the draft 2023-2027 Consolidated Plan, including the 2023 Action Plan, for activities beginning July 1st.

When: March 9, 2023 at 6:00 pm

In-Person Location: Mayor's Board Room, City Hall, 210 Lottie Street, Bellingham, WA

Virtual Option: Zoom Webinars - Meeting ID: 986 9045 9994 / Password: 21. Links and call-in information can be found at www.cob.org/cdab.

The City seeks public comment on the draft Consolidated Plan and 2023 Action Plan, which will be available for review at <https://cob.org/services/planning/consolidated-plan> or at the Bellingham Central Library beginning on February 27, 2023. The Consolidated Plan coordinates all elements of community development — housing, neighborhood development, human services and special projects — for a unified vision for community actions. The Action Plan describes planned activities for 2023 which will be based on the proposed strategies and goals in the 2023-2027 Consolidated Plan.

Comments will be accepted at the public hearing, or in writing through March 31, 2023. Written comments should be sent to the Community Development Division, 210 Lottie Street, Bellingham, WA 98225.

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. With five business days notice, special accommodations will be provided. Refer any inquiries or complaints related to HUD regulations implementing Section 504 to the Housing & Services Program Manager. Contact 778-8385 (voice) or 711 (WA State Relay).

ADVERTISEMENT FOR BID

Western Washington University is seeking proposals for the following project:

FX Hydronic Pipe and Valve Replacements, FWB03, is a project involving replacements to hydronic distribution piping laterals beneath the ground floor slabs which originate in a service tunnel. There are approximately 1140 runs included in the project that supply heat to (6) residence halls in Western Washington University's Fairhaven Complex. The scope also includes replacing approximately 500 hydronic baseboard control valve bonnet assemblies throughout the complex. Contractor will abate thermal system insulation, re-insulate piping as necessary, replace isolation valves, and restore architectural finishes disturbed by the work. The Architect/Engineer's estimate: **\$623,500.**

MWBE: Western Washington University is committed to providing the maximum practicable opportunity for participation by minority and women-owned businesses (MWBE) in public works. Voluntary goals for this project have been established as 10% MWBE and 0% WBE. Participation may be either on a direct basis in response to this invitation to bid, or as a subcontractor or supplier. However, no minimum level of MWBE participation shall be required as a condition for receiving an award and bids will not be rejected or considered non-responsive if they do not include MWBE participation. Bidders may contact MWBE at (360) 753-9893 to obtain information on certified firms.

VOLUNTARY Probid Conference and Site Walk will be held at 1:30 pm, Thursday, March 9th, 2023 at Fairhaven Residence Hall Complex - Stack 4, 467 South College Drive, Bellingham, Washington. Contact **Ryan Cullop**, WU Project Manager for more information - CullopR@wu.edu or (360) 650-7581. The prebid conference will begin promptly at the appointed time. Interested bidders are strongly encouraged to attend since this will be the only opportunity to observe on-site conditions and take field measurements. Parking permits are required to park on campus and are obtainable through online parking portal at <https://transportation.wu.edu/>. Parkmobile mobile app and campus payelaters. Bidders are encouraged to park in the "Lot" immediately west of the Fairhaven residence hall complex, under the pedestrian bridge. This meeting should be attended by a representative qualified to comprehend the contract documents for this project, and the probable or possible

NOTICE: ANNOUNCEMENT OF AVAILABILITY OF DRAFT WASTEWATER PERMIT

Permit Number: 01336310
Facility: North American LQJ Corporation
2020 E. Seavenue Road
Bellingham, WA 98225

North American LQJ has applied for a National Pollutant Discharge Elimination System (NPDES) permit in accordance with the provisions of Bellingham Municipal Code 15.14.044, Chapter 90.48 Revised Code of Washington, Chapter 173-220 Washington Administrative Code, and the Federal Clean Water Act.

North American LQJ operates an automotive engine, rebuilding facility. There is one discharge point to the City of Bellingham sanitary sewer with a maximum monthly allowable process water flow of 2,500 gallons a day (mgd). The wastewater is pretreated prior to discharge by gravity settling and skimming, followed by chemical coagulation and the use of a filter press. A tentative determination has been made on the effluent limitations and permit conditions that will prevent and control pollution. A final determination will not be made until all timely comments received in response to this notice have been evaluated.

Legals

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN AND FOR WHATCOM COUNTY

In re the Estate of:
RONALD LEE ANDERSON,
Deceased.
Cause No. 23-4-00038-37
NOTICE TO CREDITORS
RCW 11.40.030

The Administrator named below has been appointed and has qualified as Administrator of this estate. Any person having a claim against the decedent must, before the time the claim would be barred by any otherwise applicable statute of limitations, present the claim in the manner as provided in RCW 11.40.070 by serving on or mailing to the administrator or the administrator's attorney at the address stated below a copy of the claim and filing the original of the claim with the court in which the probate proceedings were commenced. The claim must be presented within the later of: (1) thirty days after the administrator served or mailed the notice to the creditor as provided under RCW 11.40.020(1)(c); or (2) four months after the date of first publication of the notice. If the claim is not presented within this time frame, the claim is forever barred, except as otherwise provided in RCW 11.40.051 and 11.40.060. This bar is effective as to claims against both the decedent's probate and nonprobate assets.

Date of First Publication: February 21, 2023

Name of Administrator: Wilma J. Catlin and William Pinkney

Attorneys for Administrator:
David M. Neubeck, WBSA
131321 Sara L. Hufford, WBSA
152098 Todd L. Silva, WBSA
154299

Address for Mailing or Service:
Elder Law Offices of
Meyers, Neubeck & Hufford, P.S.
2828 Northwest Avenue
Bellingham WA 98225-2335

Telephone: (360) 647-8848
Facsimile: (360) 647-8854

DATED this 21st day of February, 2023.

ELDER LAW OFFICES OF
MEYERS, NEUBECK & HUFFORD, P.S.
DAVID M. NEUBECK, WBSA 131321
SARA L. HUFFORD, WBSA 152098
TODD L. SILVA, WBSA 154299

Attorneys for Administrator
Wilma J. Catlin and William Pinkney
PL0111684
Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Feb 21, 2023

Grantee Unique Appendices

City of Bellingham Unique Appendices

- UA-1 Home Value Market Analysis**
- UA-2 Rent Study to determine Rent Payment Standard**
- UA-3 Homebuyer Resale and Recapture Policies**

Appendix UA-1 Home Value Market Analysis

City of Bellingham
Home Sales - Market Analysis (2022)

All Single Family Sales

Statistics 2022 (Jan - Dec)	
Number of Sales	992
Total Value	\$680,798,872
Minimum Value	\$ 164,945
Maximum Value	\$ 2,845,000
Mean Value	\$ 686,289
Median Value	\$ 622,000
95% of Median Value	\$ 590,900

Single Family Sales Only (No Condos)

Statistics 2022 (Jan - Dec)	
Number of Sales	748
Total Value	\$572,256,562
Minimum Value	\$ 220,000
Maximum Value	\$ 2,845,000
Mean Value	\$ 765,049
Median Value	\$ 680,000
95% of Median Value	\$ 646,000

Condo Only Sales

Statistics 2022 (Jan - Dec)	
Number of Sales	244
Total Value	\$108,542,310
Minimum Value	\$ 164,945
Maximum Value	\$ 2,700,000
Mean Value	\$ 444,846
Median Value	\$ 375,000
95% of Median Value	\$ 356,250

All 2-Unit Sales

Statistics 2022 (Jan - Dec)	
Number of Sales	27
Total Value	\$19,584,450
Minimum Value	\$ 510,000
Maximum Value	\$ 1,410,000
Mean Value	\$ 725,350
Median Value	\$ 690,000
95% of Median Value	\$ 655,500

All 3-Unit Sales

Statistics 2022 (Jan - Dec)	
Number of Sales	4
Total Value	\$4,581,000
Minimum Value	\$ 750,000
Maximum Value	\$ 2,000,000
Mean Value	\$ 1,145,250
Median Value	\$ 926,000
95% of Median Value	\$ 879,700

All 4-Unit Sales

Statistics 2022 (Jan - Dec)	
Number of Sales	6
Total Value	\$7,510,000
Minimum Value	\$ 940,000
Maximum Value	\$ 2,400,000
Mean Value	\$ 1,251,667
Median Value	\$ 1,100,000
95% of Median Value	\$ 1,045,000

Sales are within City of Bellingham City Limits from Jan 2022 through Dec 2022

Data obtained from Whatcom County Assessor Sales Data. "Qualified" sales only (DWD only, no Quit Claims or mobile homes in parks 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 (2022)

Single Family Sales By Bedroom Count (No Condos)

Statistics 2022 (Jan - Dec)				
	1-2 Bedroom	3 Bedroom	4+ Bedroom	Total
Number of Sales	169	419	160	748
Total Value	\$101,990,550	\$320,617,747	\$149,648,265	\$572,256,562
Minimum Value	\$ 220,000	\$ 320,000	\$ 390,000	\$ 220,000
Maximum Value	\$ 1,556,000	\$ 2,780,000	\$ 2,845,000	\$ 2,845,000
Mean Value	\$ 603,494	\$ 765,197	\$ 935,302	\$ 765,049
Median Value	\$ 575,000	\$ 700,000	\$ 800,000	\$ 680,000
95% of Median Value	\$ 546,250	\$ 665,000	\$ 760,000	\$ 646,000

Appendix UA-2 Rent Study to determine Rent Payment Standard

**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
Adjusted Payment Standard*** \$	1,351	\$ 1,431	\$ 1,762	\$ 2,504

* 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

Appendix UA-3 Homebuyer Resale and Recapture Policies

City of Bellingham Homebuyer Resale and Recapture Policies



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. 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.¹

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.

¹ Non-resale restricted homes are eligible for assistance up to a maximum of \$40,000 per household, and resale restricted homes are eligible for assistance up to a maximum of \$50,000 per household; subject to changes by Council.

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 acquire 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 verify and qualify 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 to Initial Buyer. 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 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 homeowner minus the value of any 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.

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

Deferred Maintenance	Upon inspection during resale, a broken window and a leak in a plumbing supply line were discovered. The homeowner was required to fix these conditions prior to sale.	- (\$750)
TOTAL FAIR RETURN ON INVESTMENT TO HOMEOWNER		\$ 18,500

Example:

The homeowner purchased the home for \$200,000, which includes subsidies provided by the City and other affordable housing providers. The original homebuyer's primary mortgage was \$149,000, plus an additional deferred loan of \$35,000 from the City. It has been determined that the homeowner's fair return on investment is \$18,500.

In order to realize a fair return to the original homeowner, the sales prices must be at least \$167,500 (\$149,000 mortgage and \$18,500 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 \$150,000 and \$250,000.

Sale Price	\$ 225,000
Mortgage	- 149,000
Fair Return on Investment	- 18,500
<u>City Investment</u>	<u>- 35,000</u>
Additional Equity Available	\$ 22,500

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, while ensuring a fair return on investment to the homebuyer, includes a resale restriction that limits the appreciation that the homebuyer might achieve at time of resale. The City's Fair Return calculation represents the minimum Fair Return for a seller. KCLT's resale formula may offer a greater return given their resale formula, while maintaining affordability for the next homebuyer. 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 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

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

5/9/23
Date


Title

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 specifies 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) 2023, 2024, 2025 [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.

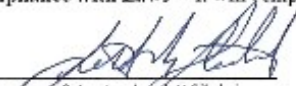
Excessive Force -- It has adopted and is enforcing:

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

5/9/23
Date

Title

CDBG
ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0008
Expiration Date: 09/28/2025

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:

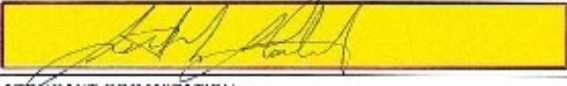
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give 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. §§4801 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. 91-618), 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.

Previous Edition Usable

Authorized for Local Reproduction

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. 91-046) 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 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 to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(s) 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 11950; (d) evaluation of flood hazards in floodplains in accordance with EO 11960; (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 175(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. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (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 assuring 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. §§469a-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 the 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
	MEYER OF BELLINGHAM
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF BELLINGHAM	5/9/23

SF-424D (Rev. 7-87) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application * 2. Type of Application: ☒ New ☐ Continuation ☐ Revision * If Revision, select appropriate (reason): * Other (Specify): 		
* 3. Date Received: * 4. Applicant Identifier: 		
5a. Federal Entity Identifier: 		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
8. APPLICANT INFORMATION:		
* a. Legal Name: CITY OF BELLINGHAM		
* b. Employer/Exempter Identification Number (EIN/TIN): 91-4001220		* c. UEI: J030FLND4004
d. Address:		
* Street1:	210 LOTTIE STREET	
* Street2:		
* City:	BELLINGHAM	
* Country/Parish:		
* State:	WA: Washington	
* Province:		
* Country:	USA: UNITED STATES	
* Zip / Postal Code:	98222-4006	
e. Organizational Unit:		
Department Name: PLANNING & COMM. DEVELOPMENT		Division Name: COMMUNITY DEVELOPMENT
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:	* First Name: SHARLA	
Middle Name:		
* Last Name:	LOTT	
Suffix:		
Title: HOUSING & SERVICES PROGRAM MANAGER		
Organizational Affiliation: 		
* Telephone Number:	360-778-8365	* Fax Number:
* Email: SHELLEY@COCOS.CRC		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: City or Township Government	
Type of Applicant 2: Select Applicant Type: 	
Type of Applicant 3: Select Applicant Type: 	
* Other (specify): 	
* 10. Name of Federal Agency: U.S. DEPT OF HOUSING AND URBAN DEVELOPMENT	
11. Catalog of Federal Domestic Assistance Number: 	
CFDA Title: 	
* 12. Funding Opportunity Number: 19.219	
* Title: COMMUNITY DEVELOPMENT BLOCK GRANT	
13. Competition Identification Number: 	
Title: 	
14. Areas Affected by Project (Cities, Counties, States, etc.): Add Attachment Delete Attachment View Attachment	
* 15. Descriptive Title of Applicant's Project: CDBG ANNUAL PROGRAM - PLANNING/MANAGEMENT AND TECHNICAL ASSISTANCE, PUBLIC SERVICES, HOUSING NEEDS, PUBLIC FACILITIES, AND SPECIAL PROJECTS	
Attach supporting documents as specified in agency instructions. Add Attachments Delete Attachments View Attachments	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: WA-002	* b. Program/Project: AA-036
Attach an additional list of Program/Project Congressional Districts if needed.	
	Add Attachment Delete Attachment View Attachment
17. Proposed Project:	
* a. Start Date: 07/01/2023	* b. End Date: 06/30/2024
18. Estimated Funding (\$):	
* a. Federal:	808,663.00
* b. Applicant:	
* c. State:	
* d. Local:	
* e. Other:	
* f. Program Income:	0.00
* g. TOTAL:	1,018,663.00
* 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	
	Add Attachment Delete Attachment 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)	
☒ 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: ROSE
Middle Name:	
* Last Name: FLESHCOE	
Suffix:	
* Title: MAYOR	
* Telephone Number: 360-778-8000	Fax Number:
* Email: MAYOR@OFFICE006.CORP	
* Signature of Authorized Representative: 	* Date Signed: 5/9/23

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

5/9/23
Date

Mayor
Title

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.

HOME
ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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:

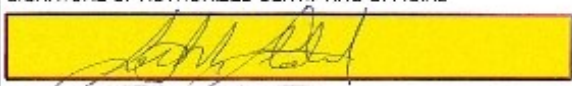
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give 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. §§4726-4753) 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. §§4801 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. 91-616), 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. §§801 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.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 42410 (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 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 to 276a-7), the Copeland Act (40 U.S.C. §275c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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 11590; (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. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (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 assuring 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. §§459a-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
	MAYOR OF BELLINGHAM
APPLICANT ORGANIZATION	DATE SUBMITTED
CITY OF BELLINGHAM	5/9/23

SF-424D (Rev. 7-87) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application		
* 2. Type of Application: ☒ New ☐ Continuation ☐ Revision		
* If Revision, select appropriate letter(s): Other (Specify):		
* 3. Date Received: 11/11/2025		
4. Applicant Identifier:		
5a. Federal Entity Identifier:		5b. Federal Award Identifier:
State Use Only:		
6. Date Received by State:		7. State Application Identifier:
B. APPLICANT INFORMATION:		
* a. Legal Name: CITY OF BELLINGHAM		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 91-6001229		* c. UCI: USACHM140064
d. Address:		
* Street1: 215 TOWN OF BELLINGHAM		
Street2:		
* City: BELLINGHAM		
Country/Region:		
* State: WA: Washington		
Province:		
* Country: UNITED STATES OF AMERICA		
* Zip / Postal Code: 98220-1009		
e. Organizational Unit:		
Department Name: LANDING & COMM DEVELOPMENT		Division Name: COMMUNITY DEVELOPMENT
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix:		
* First Name: DANNA		
Middle Name:		
* Last Name: LUTZ		
Suffix:		
Title: HOUSING & SERVICES PROGRAM MANAGER		
Organizational Affiliation:		
* Telephone Number: 360-778-8385		
Fax Number:		
* Email: SLX202K003.CEO		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: City or Township Government	
Type of Applicant 2: Select Applicant Type: 	
Type of Applicant 3: Select Applicant Type: 	
* Other (specify): 	
* 10. Name of Federal Agency: U.S. DEPT OF HOUSING AND URBAN DEVELOPMENT	
11. Catalog of Federal Domestic Assistance Number: 	
CFDA Title: 	
* 12. Funding Opportunity Number: 14.009	
* Title: HOME INVESTMENT PARTNERSHIP PROGRAM	
13. Competition Identification Number: 	
Title: 	
14. Areas Affected by Project (Cities, Counties, States, etc.): Add Attachment Delete Attachment View Attachment	
* 15. Descriptive Title of Applicant's Project: HOME INVESTMENT PARTNERSHIP ANNUAL PROGRAM - RECEIVE, ALLOCATE AND MONITOR HOME FUNDS USED IN SUPPORT OF AFFORDABLE HOUSING AND TENANT BASED RENTAL ASSISTANCE	
Attach supporting documents as specified in agency instructions. Add Attachments Update Attachments View Attachments	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: WA-002	* b. Program/Project: 02-002
Attach an additional list of Program/Project Congressional Districts if needed.	
	Add Attachment Delete Attachment View Attachment
17. Proposed Project:	
* a. Start Date: 07/01/2023	* b. End Date: 06/30/2024
18. Estimated Funding (\$):	
* a. Federal:	649,900.00
* b. Applicant:	
* c. State:	
* d. Local:	
* e. Other:	
* f. Program Income:	120,000.00
* g. TOTAL:	769,900.00
* 19. Is Application Subject to Review By State Under Executive Order 12872 Process? ☐ a. This application was made available to the State under the Executive Order 12872 Process for review on ☐ b. Program is subject to E.O. 12872 but has not been selected by the State for review. ☒ c. Program is not covered by E.O. 12872	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) ☐ Yes ☒ No If "Yes", provide explanation and attach Add Attachment Delete Attachment 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) ☒ ** 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:	
Profile:	* First Name: BETE
Middle Name:	
* Last Name:	FRIEDMAN
Suffix:	
* Title:	COYOR
* Telephone Number:	360 778 8000 Fax Number:
* Email:	COYOR@FPIBROOK.CDC
* Signature of Authorized Representative:	* Date Signed: 5/9/23

Appendix - Alternate/Local Data Sources

1	Data Source Name Whatcom Homeless Service Center List the name of the organization or individual who originated the data set. The Whatcom Homeless Service Center collects homeless housing data for Whatcom County. Provide a brief summary of the data set. Data includes information from the Whatcom Homeless Service Center centralized housing pool and permanent housing program enrollment tracked in the Homeless Management Information System (HMIS). Some data includes information from the Positive Adolescent Development (PAD) program operated by Northwest Youth Services. What was the purpose for developing this data set? The Homeless Service Center is a centralized and coordinated system to address the housing needs of the homeless. The data does include HMIS data reported to the State of Washington and HUD. How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data is the most comprehensive set of homeless data in Whatcom County. The data addresses all of Whatcom County -- not just Bellingham. What time period (provide the year, and optionally month, or month and day) is covered by this data set? Data is continuously collected, but it is reported on an annual basis for this Plan. What is the status of the data set (complete, in progress, or planned)? Complete
2	Data Source Name USPS residential vacancy data List the name of the organization or individual who originated the data set. United States Postal Service and HUD Provide a brief summary of the data set. HUD/US Postal Service Residential Vacancy Rate Data. 1st Quarter (Jan-Mar) 2008-2017 What was the purpose for developing this data set? To obtain a more accurate and timely account of current vacancy rates in residential units How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Bellingham and Washington State

	What time period (provide the year, and optionally month, or month and day) is covered by this data set? (Jan-Mar) 2008-2017
	What is the status of the data set (complete, in progress, or planned)? complete
3	Data Source Name BHA
	List the name of the organization or individual who originated the data set. Bellingham/Whatcom County Housing Authority
	Provide a brief summary of the data set. This administrative data was provided upon request by the local housing authority specifically to answer the questions within the Public and Assisted Housing (Section 91.210(b)) in the Consolidated Plan.
	What was the purpose for developing this data set? This administrative data was provided upon request by the local housing authority specifically to answer the questions within the Public and Assisted Housing (Section 91.210(b)) in the Consolidated Plan.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? The data provided regarding vouchers pertains to all of Whatcom County, even though the Jurisdiction is Bellingham. That is because vouchers are transferrable and can be used anywhere in the county. The public housing units reported are only those within the City limits of Bellingham.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? December 2022
	What is the status of the data set (complete, in progress, or planned)? Data such as number of vouchers in use is changing constantly. The data provided is accurate only as of December 2022.
4	Data Source Name 2017-2021 American Community Survey (ACS)
	List the name of the organization or individual who originated the data set. The US Census Bureau
	Provide a brief summary of the data set. This is the most recent published year of the American Community Survey 5-year summary.
	What was the purpose for developing this data set? More current than using the pre-populated ACS in the IDIS template.

	Provide the year (and optionally month, or month and day) for when the data was collected. 2017-2021
	Briefly describe the methodology for the data collection. United States Census Bureau ACS
	Describe the total population from which the sample was taken. City of Bellingham (US Census Place)
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
5	Data Source Name 2014-2018 CHAS data tabulations
	List the name of the organization or individual who originated the data set. HUD
	Provide a brief summary of the data set.
	What was the purpose for developing this data set? These are the most recent available tabulations available.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? Computed based on census data.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? 2014-2018
	What is the status of the data set (complete, in progress, or planned)?
6	Data Source Name Bellingham annual market rent study
	List the name of the organization or individual who originated the data set. City of Bellingham
	Provide a brief summary of the data set. Each year, city staff perform a month-long study of market-rate rental housing.
	What was the purpose for developing this data set? This provides more timely data of the actual costs of rental housing in the jurisdiction.

	Provide the year (and optionally month, or month and day) for when the data was collected. July 31, 2022 to August 30, 2022.
	Briefly describe the methodology for the data collection. Daily, staff screen all local online advertisements listing whole rental units between studios and 3-beds and record the posted rental price, square feet, bedroom count, and utilities provided. Lowest and highest outliers from each unit type are removed.
	Describe the total population from which the sample was taken. There was a total sample size of 370 units collected over a 1-month period.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. All whole rental unit types (apartments, townhomes, condos, single family homes, and MIL/ADUs) are recorded, as long as the square feet, address, and neighborhood of each unit.