

City of Lakewood

FY 2011 Consolidated Annual Action Plan
for Housing and Community Development
and
FY 2008 Consolidated Annual Action
Plan Third Amendment
and
FY 2009 and FY 2010 Consolidated Annual
Action Plan Amendments



Tacoma-Lakewood
HOME Consortium

May 2011

This document was prepared in accordance with the requirements established by the Department of Housing and Urban Development for local jurisdictions requesting federal housing assistance through provision of the National Affordable Housing Act of 1990, as amended.

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(Tacoma Human Services Commission, Tacoma Community Redevelopment Authority, Lakewood CDBG Citizens Advisory Board, and the Tacoma and Lakewood City staff wish to acknowledge the numerous individuals who participated and contributed their valuable assistance in the preparation and production of this joint document.)

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I. EXECUTIVE SUMMARY

The FY 2011 Consolidated Plan for the Lakewood and Tacoma HOME Consortium provides a framework for addressing housing and community development needs in these cities. The Plan is required by the US Department of Housing and Development for funding three federal programs: the Community Development Block Grant (CDBG), HOME Investment Partnership Act (HOME) and for the City of Tacoma, Emergency Shelter Grants.

The joint Consolidated Plan for Lakewood and Tacoma has allowed sharing of key public information, identification of shared housing and community development needs and resources, and consideration of regional assets and strategies to meet the needs of low and moderate-income households. The Consolidated Plan also identifies the unique needs and assets in Lakewood and Tacoma. The FY 2011 Consolidated Plan element for the City of Lakewood is a one-year Action Plan to address the needs identified for Lakewood.

The Consolidated Plan was built on a broad citizen participation process in consultation with public and private agencies. A public hearing by the Lakewood CDBG Citizens' Advisory Board and the Human Services Funding Advisory Board was held on September 9, 2010. A public hearing on the FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans was held by the City Council on April 18, 2011. The citizen participation process and public testimony received are summarized later in this Plan.

Through the planning and citizen participation process, FY 2011 policies and priorities were developed for addressing economic development, removal of blight, revitalizing neighborhoods, eliminating threats to public health and safety, conserving and expanding stocks of affordable housing. Subsequently, the Lakewood City Council adopted policies and priorities on the use of FY 2011 CDBG and HOME funds.

In FY 2011, CDBG funds are to be focused on economic development, public service, physical/infrastructure improvements, and housing, in that priority order. In addition to CDBG funds, the City's 1% allocation of General Fund is used to support human services programs.

In FY 2011, HOME funds will be used to provide housing rehabilitation repairs for low-income owner-occupied households in need of substantial repairs due to deferred maintenance to preserve housing and in some cases, prevent homelessness. In addition, some funds may be used to provide for the construction of or rehabilitation of affordable housing.

MONITORING STANDARDS AND PROCEDURES

To ensure that subrecipients are carrying out their programs in accordance with applicable laws and regulations of the program and subrecipient agreements, standards and procedures for monitoring and controlling CDBG projects and housing programs that are authorized for funding were developed. Wherever possible, problems are corrected through discussions or negotiations with the subrecipient. As individual situations dictate, desk monitoring, on-site monitoring and/or the provision of technical assistance are required.

In an effort to address potential problem areas, an assessment process in determining the timing and frequency of monitoring visits required for individual activities was developed. Each funded activity is assessed to determine the degree to which an activity or subrecipient is at risk

of noncompliance with program requirements. The extent of monitoring activities is directly related to whether the activities have been assessed as being low, medium, or high risk. The purpose and intent of monitoring visits is to identify any potential areas of noncompliance and assist the subrecipient in making the necessary changes to allow for successful completion of the activity.

EVALUATION OF PAST PERFORMANCE

The goals and objectives of the previous year were determined by priority needs identified in the FY 2010-2014 Five Year Consolidated Plan. The Five Year Plan identified three primary goals and priorities- 1) Provide Decent Affordable Housing; 2) Provide a Suitable Living Environment; and 3) Expand Economic Opportunities. These goals and priorities correspond to HUD's priority needs categories for Community Development Block Grant funding.

In 2010, the City of Lakewood funded twelve CDBG and HOME projects. These projects are having a considerable impact on the availability and accessibility of services to low-and moderate-income families, as well as improving lives and communities throughout Lakewood.

During the previous year, expenditures were made for the following projects:

- Down payment assistance for first time homebuyers
- Housing Rehabilitation and Major Home Repair assistance for low-income homeowners
- Emergency Minor Home Repair for low-income homeowners
- Design and construction of sewer mains and corresponding infrastructure installed in CT 72000, Lakewood's highest concentrated area of low-income residents (80.6%)
- Park improvements at Ward's Lake Park
- Exterior painting of residences for low-income seniors and individuals with disabilities
- Acquisition of a recently abated blighted property for the redevelopment of multiple low-income housing units
- Replacement of stairways at a 16-unit low-income apartment complex owned and operated by a local housing authority
- Public services funding for a community service center offering services such as a senior meals site, food bank, clothing exchange, medical clinic, Women, Infant and Children Program, and a library to the Tillicum and Woodbrook neighborhoods, Lakewood's highest concentrated area of low-income residents (80.6%)
- Rehabilitation of a 15-unit low-income housing complex
- Workshops were provided to aid tenants, property owners, property managers, landlords and housing providers better understand their rights and responsibilities under landlord/tenant laws and fair housing laws

As a result of the sluggish economy, the City of Lakewood continues to suffer from high levels of unemployment and foreclosures. Through the Neighborhood Stabilization Program 1 (NSP1), the City has been able to abate blighted structures on nine foreclosed properties and acquire two abandoned or foreclosed properties it intends to redevelop into eight low-income single family residences. These efforts have allowed the City to improve and revitalize local communities through removal of slums and blight and the construction of new affordable housing units. In addition, as part of the American Reinvestment and Recovery Act of 2009, the City is investing CDBG-R funding into the construction of sewer mains to the predominantly low-income communities of Tillicum and Woodbrook. The installation of this infrastructure will allow for much needed housing development/improvements, and in a greater sense, will drive the economic development of these isolated communities for years to come.

During FY 2010, the City has made substantial progress initiating the goals and objectives set forth in the FY 2010-2014 Five Year Consolidated Plan. In the first year of the Plan, the City has addressed 11 of 13 primary objectives and is on task to meet the goals and performance measures identified in the Plan. A complete evaluation of the performance measures, including spending accomplishments, will be provided as part of the Consolidated Annual Performance Evaluation Report (CAPER) for FY 2010.

GEOGRAPHIC FUNDING DISTRIBUTION/ALLOCATION PRIORITIES

Through a planning and citizen participation process, FY 2011 policies and priorities were developed for addressing economic development, removal of blight, revitalizing neighborhoods, eliminating threats to public health and safety, and conserving and expanding stocks of affordable housing. As a result of this process, the Lakewood City Council adopted the following policies and priorities on the use of FY 2011 CDBG and HOME funds in order of priority:

1. Economic Development
2. Public Service
3. Physical Infrastructure Improvements
4. Housing

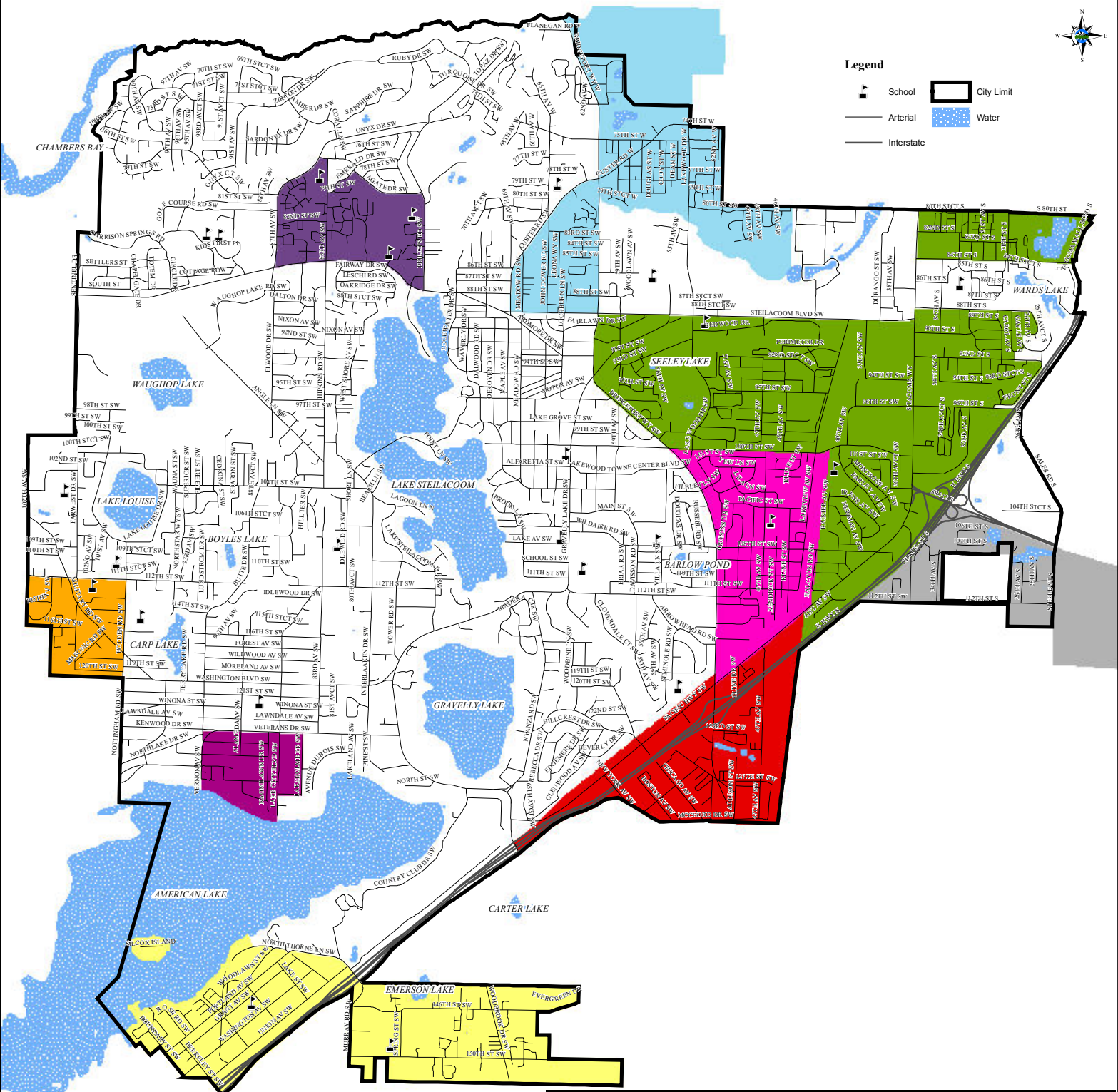
In targeting CDBG and HOME funds, the City has typically looked to Block Groups with at least 51% low-and moderate-income populations as many of Lakewood's minority and ethnic populations have historically been concentrated in these areas. Lakewood's African American and Hispanic populations tend to have higher concentrations of populations in these Block Groups as compared to the overall citywide population average of 35.2% Non-White, 12.3% African American, and 8.5% Hispanic.

By funding the Tillicum Community Center Operations (Public Service), Habitat for Humanity Washington Avenue Sewer Extension (Physical/Infrastructure Improvements), and the Pierce County Housing Authority Brookridge Apartments Sewer Design (Housing), the City is targeting a predominantly low-income Census Tract (72000) with a higher concentration of Non-White, African American and Hispanic populations. The City also plans to target this Census Tract with its Major Home Repair/Sewer Loan Program, which will aid low-and moderate-income homeowners with the costs associated with connections to sewers in these neighborhoods. For all other funding, the City has not identified specific targeted areas; programs are open to all eligible low-and moderate-income individuals citywide.



Legend

- School
- City Limit
- Arterial
- Water
- Interstate



City of Lakewood CDBG Geographic Funding Distribution/Allocation

*Block Group	% LMI Population	% Population Non-White	% Population African American	% Population Hispanic
072000.7	91.5	34	21.7	11.04
072000.6	91.1	42	23	14.56
071706.1	86.4	40	19	5.07
072000.4	84.3	36	14.6	16.91
071805.3	83.7	49	19.3	14.98
071806.2	82.5	57	23.1	17.9
071806.1	81.2	55	21	23.05
072000.5	79.3	38	20.4	12.16
071804.1	76.6	47	23.6	20.74
072000.1	74.9	39	14.3	11.34
071804.5	73.3	37	9.6	9.95
071804.4	72.9	55	19.7	8.57
071805.1	72.9	59	20.6	11.87
072000.3	69.8	38	18.5	6.35
072000.2	65.2	30	15.6	3.97
072106.3	64.3	41	20.1	8.2
072106.4	63.6	42	23.9	12.67
071805.2	63.2	69	16	9.92
071804.6	62.7	58	30.7	8.34
071803.2	60.3	51	20.7	8.29
072112.3	59.6	41	18.9	9.78
071803.4	59.5	39	16.3	20.83
072108.3	55.3	27	9.3	6.39
071803.3	54	43	20.5	5.28
071804.3	53.3	53	15.7	11.72

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FY 2011 funding allocations* are as follows:

Economic Development

16.3% of the total CDBG allocation is targeted toward economic development activities (priority 1) focused on providing jobs or services to lower income persons citywide. The Economic Development Business Loan Program, as offered in partnership with Community Capital Development, provides access to capital and business assistance to small businesses, with special emphasis on low-income, women and minority entrepreneurs and small businesses of distressed and underserved populations.

Public Service

A total of 15% of the CDBG allocation will be targeted toward public service activities (priority 2) providing for the funding of a low-income neighborhood community center and a financial and housing counseling program. The Community Center, located in the Tillicum/Woodbrook neighborhood, comprised of CT 72000, is Lakewood's highest concentration of low-income residents (80.6%). The Center provides a food bank, clothing bank, senior meal-site, medical clinic, Women Infants and Children Program and library services. The financial and housing counseling program will focus on providing foreclosure prevention assistance, loan modification assistance and financial counseling primarily to low-income seniors, people with disabilities, and other vulnerable Lakewood households to prevent foreclosure or homelessness and secure affordable housing solutions.

Physical/Infrastructure Improvements

18.8% of the total CDBG allocation is targeted toward physical/infrastructure improvements (priority 3) to improve low-income resident's access to public facilities through the construction of a sanitary sewer main in Tillicum on Washington Avenue.

Housing

Additionally, 37.9% of the total CDBG allocation is targeted toward housing related improvements (priority 4) for lower income residents citywide. Funding provides for the administration of a house painting program for low income elderly and disabled residents, the design and engineering of an 8" sewer mainline extension and corresponding 6" side sewers for a 69 unit public housing apartment community owned and operated by the Pierce County Housing Authority, a citywide Major Repair/Sewer Connection program, a housing repair/rehabilitation program serving low-income seniors, disabled persons or families with children, and an emergency assistance program for displaced residents.

*Note: The proposed FY 2011 CDBG and HOME funding allocations are estimates only. Final program allocations shall be adjusted proportionately to final CDBG and HOME allocations.

AFFORDABLE RENT

Affordable rents for the purposes of Community Development Block Grant funding shall not exceed the fair market rent for existing housing for comparable units in the area as established by HUD under 24 C.F.R. § 888.111.

II. CITIZEN PARTICIPATION PROCESS

INTRODUCTION

This section of the City of Lakewood's element of the Joint Tacoma and Lakewood Consolidated Plan for Housing and Community Development was prepared in accordance with requirements established by the Department of Housing and Urban Development for local jurisdictions receiving Community Development Block Grant (CDBG) and HOME Investment Partnership Act funding through provisions of the National Affordable Act of 1990, as amended.

Citizen participation was encouraged throughout this process culminating in the development of the FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans for approval by the Tacoma and Lakewood City Councils. Public resources anticipated to be available will be used primarily for economic development, public service, community development, and housing activities which benefit low and moderate income citizens.

SUMMARY OF CITIZEN PARTICIPATION PROCESS

The FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans were developed in coordination with the City of Tacoma and local organizations and agencies. As a federally mandated document, the plan must meet specific citizen participation requirements before submission to the federal government. Citizen activities included notification in THE NEWS TRIBUNE on August 13, 2010 of a September 9, 2010 public hearing held by the Lakewood CDBG Citizens' Advisory Board on the acceptance of proposals for Fiscal Year 2011 (July 1, 2011 – June 30, 2012) Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) programs. Notification of the Draft FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans was published on April 1, 2011 in THE NEWS TRIBUNE indicating where the document would be available for review during a 30-day citizen comment period. A public hearing by the Lakewood City Council was held on April 18, 2011 to receive comments from citizens, State of Washington, Pierce County, City of Tacoma, public agencies and other interested parties on the draft document. Copies of the Plan were made available to those requesting copies. Records on the proposed economic development, housing, public service, and community development projects were made accessible to the general public. Comments received at the public hearings held by the Lakewood CDBG Citizens Advisory Board and the Lakewood City Council is summarized later in this report.

Upon the Lakewood and Tacoma City Councils adoption of the Joint Consolidated Action Plan, it will be submitted for approval to the U. S. Department of Housing and Urban Development.

ORGANIZATIONAL INVOLVEMENT AND CONSULTATION

In preparing the Five Year 2010-2014 Joint Tacoma and Lakewood Consolidated Plan, the FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans, the City of Lakewood coordinated with the City of Tacoma and various public and private agencies providing housing, health, and social services and a number of other units of government including the Pierce County Housing Authority, Pierce County and the State of Washington.

Focus Groups

In its Citizen Participation Plan and development of the Five Year (2010-2014) Consolidated Plan, the City conducted focus groups with neighborhood groups and key stakeholder-based groups.

Neighborhood Groups

Focus group meetings were conducted with Lakewood's five neighborhood associations in the development of the Five Year (2010-2014) Consolidated Plan. These neighborhood associations included the Lake City Neighborhood Association, Pacific Neighborhood Association, Northeast Neighborhood Association, Lakeview Neighborhood Association, and the Tillicum/Woodbrook Neighborhood Association.

Stakeholder Groups

Focus group meetings were also conducted with stakeholders able to provide critical input on the needs of homeless and low-income residents of the City. These groups included:

- The Human Services Community Collaboration included representatives of 31 agencies providing services to youth, victims of domestic violence, low income individuals and families, elderly persons, military families, displaced homemakers, ethnic minorities, homeless and hungry persons, and persons leaving incarceration and the families of persons incarcerated. Schools and school-based programs for low income youth and families, the Tacoma/Pierce County Health Department, and other governmental agencies providing health and human services were also included.
- The Housing Providers focus group included representatives of key housing providers, including providers and developers of low income housing, special needs housing, and military housing. Specific providers who participated included Associated Ministries, the Lakewood Area Shelter Association, Network Tacoma, Habitat for Humanity, Martin Luther King Housing Development Association, Greater Lakes Mental Health Center, McChord Air Force Base, Master Builders of Pierce County, and the Metropolitan Development Council.
- Churches provide significant services both for their own parishioners and for others in the community. A church focus group included representatives of a variety of churches and temples, as well as the Associated Ministries, an ecumenical group.
- Landlords/apartment managers and realtors/lenders participated in focus groups, providing input on access to housing, issues related to Section 8 Voucher use by low income residents, and information on housing-related service needs.

Public Agencies and Participation

Since the development of the Five Year (2010-2014) Joint Consolidated Plan, the City has continued to consult with the Pierce County Housing Authority, the Lakewood Area Shelter Association, Tacoma/Pierce County Habitat for Humanity, Metropolitan Development Council, Associated Ministries and Network Tacoma on a wide range of housing issues in providing services to qualified low-income citizens in Lakewood. The Housing Authority provides Section 8 vouchers and currently owns and operates 407 units in Lakewood, which are described later in this report.

CITIZEN COMMENTS ON FISCAL YEAR 2011 PROCESS

The following comments were received as part of the Fiscal Year 2011 citizen participation process. They include oral testimony provided at the September 9, 2010 joint public hearing held by the CDBG Citizens Advisory Board and Human Services Funding Advisory Board, and the Lakewood City Council public hearing held on April 18, 2011.

Joint CDBG Citizens Advisory Board and Human Services Funding Advisory Board Public Hearing on Community Development Needs – September 9, 2010

The following testimony was presented at this public hearing:

Ms. Cathy Brewis- Multicare Mary Bridge Hospital

Ms. Brewis discussed the need to fund programs that assist grieving children. She stated that 1 in 20 children suffer the loss of a parent and that 1,546 Lakewood children suffered the death of a parent in 2009.

Ms. Beth Elliott- FISH Food Banks

Ms. Elliott stated they have experienced an 84% increase in persons coming to their food banks in need of assistance; in August 2010 alone, 1,136 new individuals visited the food banks. She expressed the need to fund food assistance programs to meet the basic needs of Lakewood citizens.

Ms. Penni Maples- Sexual Assault Center

Ms. Maples spoke briefly about problems school children are currently facing- sexual assault, bullying, harassment, and domestic violence and the need to support funding for programs to assist children in dealing with these issues.

Mr. Jim Anderson- Catholic Community Services

Mr. Anderson discussed the need for homeless services programs, in particular, the need in Lakewood for homeless shelter services as those services are not currently available in Lakewood.

Mr. Rodd Kowalski- Pierce County Housing Authority

Mr. Kowalski commented on the urgent need in Lakewood for the construction or acquisition of additional affordable housing units. He stated that there are currently 226 households on the Section 8 voucher list currently living in Lakewood and stressed the need for additional affordable housing to meet those needs.

Ms. Helen McGovern- Emergency Food Network

Ms. McGovern discussed the need to fund food bank programs as the demand for food assistance grows. She stated that she has seen a 48 percent increase in the number of organizations served in 2010. She also discussed the problems her organization is experiencing in acquiring food donations as many of the stores and wholesalers are selling their food rather than donating it, forcing her to purchase portions of her foodstuffs.

Ms. Sue Potter- Tacoma/Pierce County Habitat for Humanity

Ms. Potter commented on the need for investing in affordable housing for low-income families. She stated that Habitat receives approximately 600 applications annually, yet are only able to provide 16 to 20 new homes each year.

Ms. Karen Priest- Tillicum Community Center

Ms. Priest spoke of the benefits the center provides to the geographically isolated residents of Tillicum and Woodbrook through CDBG and Human Services funding. She said that the center provides a food bank, library, clothing bank, Women and Infants program, as well as a central gathering place for low-income residents of Tillicum and Woodbrook.

Ms. Miriam Barnett- Human Services Coalition for Pierce County & YWCA

Ms. Barnett discussed the need to fund shelter programs. She stated the YWCA turns away an average of 200 people a month due to an insufficient number of housing units.

Mr. Jamie Anderson- Helping Hand House

Mr. Anderson discussed the need to increase funding for homeless prevention services such as rental and utility assistance. He stated that Helping Hand House had to turn away 200 individuals for homeless prevention services.

Ms. Diane Formoso- Caring for Kids

Ms. Formoso commented on the need to fund school supplies programs for children. She stated that Caring for Kids provided backpacks, school supplies, coats, underwear, and miscellaneous clothing to 1,846 children at Lochburn Middle School in 2009.

Mr. John Cobun- Lakewood resident

Mr. Cobun stated that maintaining CDBG housing programs is a vital resource to many low-income residents whom would otherwise be unable to afford housing repairs. He also discussed the need to expand Section 8 funding for affordable housing assistance.

Mr. Chris Ensor- Tacoma Area Coalition for Individuals with Disabilities

Mr. Ensor discussed the increasing need to develop affordable housing and affordable supportive housing for persons with disabilities.

Ms. Bess Scott- Fair Housing Center of Washington

Ms. Scott discussed fair housing concerns in Lakewood. She stated that from 2005 – 2010 Lakewood had 35 complaints, 245 calls, and the Center conducted 35 fair housing tests. She pointed out the need for fair housing workshops for landlords and apartment owners.

Ms. Sharon Lee- Low Income Housing Institute

Ms. Lee commented on the current blighted conditions at Fir Acres Mobile Home Park. She noted that the park had been poorly managed over the years and expressed a desire to see the City of Lakewood partner with a non-profit organization to maintain the park as affordable housing. She commented on the shortage of affordable housing in Lakewood and stressed the importance of maintaining existing affordable housing stock.

Mr. Duane Wilkerson- Pierce County Aids Foundation

Mr. Wilkerson spoke about the need to fund gay & lesbian and bisexual shelter and medical case management programs.

City Council Public Hearing on Approval of the Consolidated Plan – April 18, 2011

Speaking before the Council were:

Mr. Jim Taylor- Lakewood resident

Mr. Taylor spoke in support of the proposed funding for the Tillicum Community Center and the funding needs of the Center. He noted that with increased enrollment at Tillicum Elementary School that 96% of the students are receiving free-reduced lunch.

Ms. Karen Priest- Lakewood resident

Ms. Priest thanked the CDBG Citizens Advisory Board and the Council for CDBG funding. A fundraiser is being planned at the McGavick Center to help support the Tillicum Community Center. She indicated that she is working with an agency to provide medical services when Community Health Care closes its door on June 1, 2011.

Mr. Wayne Chapman- Lakewood resident

Mr. Chapman spoke about the City's emergency program when he lost his home through a fire and thanked the City for helping.

Ms. Maria Roberts- Lakewood resident

Ms. Roberts thanked the Council for the City's emergency program and her plight with her landlord.

Mr. David Roberts- Lakewood resident

Mr. Roberts thanked the Lakewood Fire Station for finding his family a home and paying for a motel.

Ms. Kim Taylor- Tacoma resident

Ms. Taylor spoke on behalf of Rebuilding South Sound in support of a grant to help with home repairs. A "Building a Ramp" program is being planned this summer.

Ms. Maureen Fife- Gig Harbor resident

Ms. Fife spoke on behalf of Habitat for Humanity in support of funding homeownership in Lakewood.

Mr. Dennis Haugen- Lakewood resident

Mr. Haugen spoke about the need for jobs and developing alternative funding and that the City should know the names of who the City is providing food and services to.

Ms. Linda Jadwin- Community Capital Development

Ms. Jadwin spoke about the first economic development project in Lakewood and other potential clients.

Mr. Rod Kowalski- Pierce County Housing Authority

Mr. Kowalski spoke in support of the Consolidated Plan and thanked the CDBG Citizens Advisory Board and staff for their deliberations and work.

III. FY 2011 ANNUAL ACTION PLAN & PROPOSED USE OF FUNDS

GENERAL SUBMISSION REQUIREMENTS

The Annual Action Plan includes: (1) the annual policy statement; (2) housing and community development programs, projects and activities which have been recommended for funding during the program year which support the Five Year Consolidated Plan; (3) standards and procedures which will be used to monitor housing and community development activities and performance, (4) coordination activities between public agencies, and (5) a list of proposed projects.

FY 2011 POLICY STATEMENT

The Lakewood City Council annually passes a policy statement to provide direction for the selection of housing and community development projects and programs to be supported with Community Development Block Grant and HOME Investment Partnership Act funds. The policy statement for Fiscal Year 2011 is shown below:

GENERAL

1. All programs and projects will be consistent with the Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) program regulations as applicable.

CDBG projects must meet one of the three U. S. Department of Housing and Urban Development national objectives: (a) benefiting low and moderate income persons, (b) removing slums or blights or (c) meeting an urgent need.

HOME projects must provide housing or assist in housing for low-income persons.

2. Priority consideration (not necessarily in the following order) will be given to projects which:
 - a. Are consistent with the Consolidated Plan.
 - b. Use CDBG and HOME funds to leverage funds from other sources.
 - c. Demonstrate collaboration and cooperation with community residents and other community organizations that will improve service delivery and/or cost effectiveness.
 - d. Promote or facilitate self-sufficiency.
 - e. Are prioritized consistent with Lakewood City Council goals, subject to CDBG and HOME regulations.
3. Can be implemented within twelve months.
4. Do not require General Fund allocations for continuing operation and maintenance or which reduce current operation and maintenance costs. (Note: It is recognized, that to address community needs, some federal funded projects may require support from the General Fund for operation and maintenance costs, however, these projects must have a commitment from the General Fund prior to being recommended for federal funding.)

5. CDBG funds may be set aside in the Contingency category to cover unanticipated cost overruns on projects during the program year. Funds in the Contingency category will not exceed five (5) percent of the total grant.
6. Up to 15 percent of the total CDBG grant may be set aside of public service programs.
7. The CDBG Citizens Advisory Board (CDBG/CAB) will review and make recommendations for the programming and reprogramming of CDBG and HOME funding.
8. The CDBG/CAB will review funding proposals for CDBG and HOME projects and will recommend projects for CDBG and HOME funding from new and reprogrammed allocations.
9. The CDBG/CAB will recommend annual funding policies and will recommend CDBG and HOME funding allocations by applicable categories (i.e. economic development, public service, community development (physical/infrastructure improvement), and housing in the Consolidated Annual Action Plan for consideration by the City Council.
10. The Tacoma Community Redevelopment Authority (TCRA) will review loan and grant applications for housing development projects funded by HOME Investment Partnership Act funds and make funding decisions based on projects meeting the lending criteria of the TCRA in accordance with the allocations to specific housing categories as approved by the Lakewood City Council.

CITY COUNCIL GOAL & PRIORITIES:

The Lakewood City Council overarching goal for the use of CDBG funds for FY 2011 is to enable economic development. The following areas are prioritized in order: economic development, public service, physical/infrastructure improvements, and housing.

PRIORITY 1 - ECONOMIC DEVELOPMENT

The policy for economic development is to create viable businesses in targeted areas and to create and/or retain jobs for lower income persons.

Activities that support this policy include, not necessarily in priority order.

1. Assistance to businesses to make exterior improvements to facilities.
2. Assistance for microenterprise businesses.
3. Loans to businesses expanding jobs for lower-income persons.
4. Infrastructure to support businesses.

PRIORITY 2 - PUBLIC SERVICE

The policy for CDBG funded public service activities is to target low-income clientele. Most of the City's human services activities are supported through 1% of the City's General Fund.

PRIORITY 3 – PHYSICAL/INFRASTRUCTURE IMPROVEMENTS (COMMUNITY DEVELOPMENT)

The policy for physical/infrastructure improvements is to support neighborhood revitalization and improvements to spur economic development activities and improve living conditions for lower income persons. Activities that support this policy include:

1. Construction or improvement of public facilities (i.e. sewers, streets, sidewalks, alleys, lighting or related public improvements) in lower income residential neighborhoods or for business that create and/or retain jobs for lower-income persons.
2. Construction or rehabilitation of public or privately-owned, community service facilities (i.e. community, senior and youth centers) that will provide a public service benefiting low-income citizens.
3. Acquisition, development and improvement of parks, playgrounds and open space in lower-income residential neighborhoods.

PRIORITY 4 - HOUSING

The policy for housing is to support economic development and job development/retention by improving neighborhoods to expand opportunities for affordable housing for lower-income individuals, and to preserve affordable housing to prevent homelessness and to improve property values and neighborhood characteristics. Activities that support this policy include:

1. Projects that develop or renovate housing to create housing near jobs and promote economic viability.
2. Projects that conserve existing housing by making home repairs or rehabilitating homes to meet building and housing codes.
3. Projects that provide affordable housing and homeownership and rental housing opportunities.
4. Projects that support housing to accommodate persons with special needs.
5. Projects that provide housing for homeless or transitional shelter for homeless persons.
6. Projects that coordinate housing efforts in the city, county and neighboring jurisdictions to assess housing needs and create affordable housing opportunities.

HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES

For Fiscal Year 2011 the following projects are recommended for funding to support Lakewood's housing and community development strategies:

GOAL/OBJECTIVE: EXPAND ECONOMIC DEVELOPMENT OPPORTUNITIES

Strategy: Support economic development activities that provide or retain livable wage jobs for low and moderate income persons.

Activity: Develop a low-interest loan and technical assistance program to serve as an incentive for businesses to create or retain jobs for low and moderate income persons.

The proposed use of funds provides for the creation of a low-interest business loan and technical assistance program for the purpose of creating and/or retaining low-income jobs. Job creation or retention for lower income persons may be provided through creation of new enterprises or microenterprises, expansion of existing businesses, modernization, business operations counseling and other technical assistance.

Outcome Measure: Sustainability for the purpose of providing economic opportunities.
Outcome Indicator: Number of low and moderate income individuals who have jobs created or retained.
Expected Units: (Five-Year Goal) 15 jobs created or retained
Expected Units: FY 2011 – 3 jobs created or retained

GOAL/OBJECTIVE: PROVIDE DECENT HOUSING FOR LOW INCOME INDIVIDUALS

Strategy: Preserve existing owner-occupied housing stock.

Activity: Provide a range of home repair assistance to qualified lower-income homeowners.

The City offers four housing repair programs, two administered by the City (Major Home Repair/Sewer Connection Program and Housing Rehabilitation), and two programs administered through local nonprofits (Paint Tacoma/Pierce Beautiful and Rebuilding Together South Sound). Program funding will assist low and moderate income homeowners maintain their homes and make necessary repairs due to deferred maintenance, make accessibility improvements, complete general property and major systems upgrades, and provide assistance in bringing homes into compliance with current building codes. Funding for these programs is available to all low-income Lakewood residents, although special emphasis will be placed upon serving low-income elderly homeowners (60 years of age and over) and disabled (no age limit) individuals. Funding for the construction of side-sewers for low-income owner-occupied households in the Tillicum/Woodbrook neighborhoods will also remain a primary focus.

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.
Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation for the purpose of providing decent affordable housing.
Expected Units: (Five-Year Goal) 25 Major Housing Rehabilitation households – HOME/CDBG
Expected Units: FY 2011 – 5 Housing Rehabilitation households – HOME
Expected Units: FY 2011 – 3 Major Home Repair households – CDBG
Expected Units: FY 2011 – 8 Paint Tacoma-Pierce Beautiful households – CDBG
Expected Units: FY 2011 – 7 Rebuilding Together South Sound Households – CDBG

Strategy: Expand/sustain affordable homeownership opportunities.

Activity: Reduce the financial burden of new homeowners through assistance with down payment for home purchases.

Funds will be used to assure that low and moderate income households are provided opportunities to become homebuyers of affordable housing through the down payment assistance program. Down payment assistance is an important tool in expanding opportunities for first time homebuyers.

Outcome Measure: Affordability for the purpose of providing decent affordable housing.
Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have access to affordable housing for the purpose of providing decent affordable housing.
Expected Units: (Five-Year Goal) 7 Down Payment Assistance households
Expected Units: FY 2011 – 2 Down Payment Assistance households

Activity: Collaborate with partners and housing providers toward the goal of expanding homeownership opportunities.

Work with housing providers in developing and maintaining permanent affordable housing for targeted low-income households through the development of vacant, underutilized and other properties that provide an opportunity for development and/or redevelopment.

Strategy: Provide assistance to preserve the quality and habitability of affordable rental housing.

Activity: Provide incentives to improve properties.

Work with public and private landlords to improve their rental properties through code enforcement, the crime-free multi-housing program and open blighted properties to new ownership and development. As an incentive, certification of the Crime Free Multi-Housing program is provided to managers who successfully complete the program and their complex is then placed on a national registry of properties designated as a “crime free” certified unit.

Activity: Collaborate with partners and housing providers to develop and implement strategies to preserve affordable rental housing.

The proposed use of funds will provide for the design and engineering of an 8” sewer mainline extension and corresponding 6” side sewers for a 69 unit public housing apartment community owned and operated by the Pierce County Housing Authority. Continue to collaborate with Network Tacoma, Pierce County Housing Authority, and other housing providers to preserve rental units and other project-based Section 8 properties to sustain assisted units for Lakewood residents.

Outcome Measure: Affordability for the purpose of providing decent affordable housing.
Outcome Indicator: Number of households that have access to affordable housing through a collaborative effort to develop and implement strategies to preserve affordable housing for the purpose of providing decent affordable housing. Number of rehabilitated units that are 504 accessible; number of units brought up to HQS standards.
Expected Units: (Five-Year Goal) 70 Rental Households
Expected Units: FY 2011 – 69 Rental Housing Units

Activity: Support crime-free housing activities.

Continue to offer training for rental property owners and managers as well as inspections of properties to identify security weaknesses and potential security improvements through the Crime Free Housing Program.

Strategy: Provide assistance for a continuum of housing for persons with special needs, homeless persons and people at risk of homelessness.

Activity: Develop partnerships with housing providers and human services agencies for providing emergency shelters, transitional housing and affordable permanent housing.

The City supports a Continuum of Care for housing and public service activities for homeless families and individuals. The City's Human Services Program Level II General Fund program emphasizes prevention for human services activities such as outreach and transitional housing programs provided by the Lakewood Area Shelter Association, the Tacoma Rescue Mission, Good Samaritan Community Health and Catholic Community Services. Funding is also provided to assist individuals with disabilities and emergency respite shelter, as well as shelters for victims of domestic violence.

The City is a member of the Pierce County Continuum of Care Committee and the Pierce County Homeless Coalition, SHB 2060 and SHB 2163 Committees which plans and implements housing and services to assist the homeless and the prevention of homelessness.

Activity: Support the efforts of the Ten-Year Regional Plan to End Chronic Homelessness in Pierce County.

Continue to partner with Pierce County, and the City of Tacoma in supporting the efforts of the Ten-Year Regional Plan to end chronic homelessness in Pierce County and the Ten Year Plan to reduce all homelessness statewide and county-wide by 50%. With the recent enactment of SHB 2163 the City has partnered with Pierce County, City of Tacoma, and other small cities' officials in implementing SHB 2163 to reduce homelessness by 50%.

Strategy: Reduce barriers to affordable housing.

Activity: Support fair housing activities such as outreach and education.

In 2010, the City updated its Analysis of Impediments which supports education on fair housing practices and responsibilities, developing partnerships to reduce impediments, and reducing acts which limit housing choice. To this end, the City has worked to update its Comprehensive Plan on a number of policies encouraging infill housing, zoning to permit higher housing densities, and strategies and partnerships to increase affordable, safe and adequate housing.

In an effort to support education on fair housing practices and responsibilities, workshops are provided to aid property owners, property managers, landlords and housing providers in better understanding their rights and responsibilities under landlord/tenant laws and fair housing laws. In 2010/11, this fair housing service is being provided in cooperation with the Fair Housing Center of Washington. In addition, the Police Department continues to support fair housing education, outreach, and landlord/tenant counseling through crime-free housing activities. As a condition for Down Payment Assistance and Neighborhood Stabilization Program eligibility, potential homebuyers are required to attend homeownership counseling classes that assist

homebuyers in evaluating financing options, establishing or repairing credit histories, and learning basic home budgeting and maintenance.

In 2011, CDBG funding is being provided to housing programs that provide foreclosure prevention and financial counseling, as well as relocation assistance to individuals and families at risk of homelessness. These programs include the City administered Emergency Assistance for Displaced Residents and the Financial and Housing Counseling Program administered by South Sound Outreach Services. In funding these programs, the City is seeking to provide an outlet to homeowners at risk of homelessness due to discriminatory or predatory lending practices, foreclosure, or as a result of building and code enforcement closures, fires, or redevelopment activities.

Outcome Measure: Accessibility for the purpose of providing decent affordable housing.
Outcome Indicator: Number of individuals having access to affordable housing through fair housing activities for the purpose of providing decent affordable housing.
Expected Units: (Five-Year Goal) 500 Households
Expected Units: FY 2011 – 75 Households

Strategy: Develop new affordable housing.

Activity: Develop partnerships with housing providers to develop and construct new affordable permanent housing.

The proposed use of funds will provide for the construction of low-income single-family residences in the Tillicum neighborhood. In addition, the City, through the Neighborhood Stabilization Program, will assist in the redevelopment of two formerly vacant and abandoned properties in the Tillicum neighborhood into low-income single-family residences. All construction shall be conducted through a partnership with Habit for Humanity.

Outcome Measure: Affordability for the purpose of providing decent affordable housing.
Outcome Indicator: Number of 50 percent and below area median income households acquiring affordable housing through programs providing new affordable housing options.
Expected Units: (Five-Year Goal) 5 Households
Expected Units: FY 2011 – 2 Households – HOME

GOAL/OBJECTIVE: PROVIDE A SUITABLE LIVING ENVIRONMENT

Strategy: Revitalize targeted neighborhoods.

Activity: Assist with sewer connections for single-family owner-occupied units in targeted areas.

Revitalization activities in targeted neighborhoods (such as Tillicum and Woodbrook) aimed at assisting homeowners maintain their properties in decent and sanitary condition, including assistance with the costs of replacing side sewer connections and decommissioning existing septic systems.

Outcome Measure: Accessibility for the purpose of creating suitable living environments.
Outcome Indicator: Number of households having access to a new infrastructure service, including sewer connections for single-family owner-occupied units in targeted areas for the purpose of providing a suitable living environment.
Expected Units: (Five-Year Goal) 15 Households
Expected Units: FY 2011 – 7 Major Home Repair/Sewer Connection households

Activity: Support code violation enforcement activities and activities to remove slums and blight.

Code enforcement is a tool to support and reinforce the improvement of properties in neighborhoods. CDBG funds may be used to reduce and remove slums and blight. Through the Neighborhood Stabilization Program, the City assists with the demolition and removal of blighted structures and the purchase of foreclosed or abandoned homes to rehabilitate or redevelop to resell these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes.

Strategy: Maintain/improve community facilities and public infrastructure.

Activity: Support community facilities providing emergency services and basic needs.

The proposed use of funds provides for the construction of sanitary sewer main along Washington Avenue between Spruce Street and Maple Street in the Tillicum low-income neighborhood. The construction will consist of sewer installation and corresponding road replacement.

CDBG funding will also provide for the operation of the Tillicum/American Lake Gardens Community Center which serves primarily low and moderate income residents in the City's highest low/mod census tract (80.6 percent). Services provided include an emergency food bank, clothing bank, senior meal site, library and the Center houses programs that provide prenatal and childcare services and health and dental services to low/moderate income families.

Outcome Measure: Accessibility for the purpose of creating a suitable living environment.

Outcome Indicator: Number of persons having new access to a community center facility for the purpose of providing a suitable living environment.

Expected Units: FY 2011 – 3,922 persons

Outcome Indicator: Number of people having access to a new infrastructure service, including street related improvements, park improvements, and other small public capital improvements for the purpose of providing a suitable living environment.

Expected Units: FY 2011 – 3,922 persons

NEIGHBORHOOD STABILIZATION

The City of Lakewood administers a Neighborhood Stabilization Program (NSP 1) grant from HUD through the State of Washington Department of Commerce to assist with the demolition and removal of blighted structures and the purchase of foreclosed or abandoned homes to rehabilitate or redevelop to resell these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes.

The City of Lakewood has also applied for Neighborhood Stabilization Program (NSP 3) grant through the State of Washington Department of Commerce that, if awarded, will be used to revitalize the predominately low-income neighborhood of Tillicum through redevelopment of vacant, foreclosed or abandoned properties.

CONTINUUM OF CARE (HOMELESS AND SPECIAL NEEDS)

Pierce County homeless providers, developers and governmental agencies have joined to develop a comprehensive plan for a coordinated system of care for the homeless with the goal of ending homelessness in the county. In 1996, the Tacoma/Pierce County Coalition for the Homeless created the Pierce County Continuum of Care (CoC) to serve as the planning body of the Coalition. Lakewood is a member of the CoC and participates in the monthly meeting to discuss issues related to the activities of the long-range plans it has developed and each year updates its two plans aimed at reducing homelessness.

The overall Continuum of Care Plan covers all homeless populations in the County and outlines the housing, services and systems changes activities planned by the CoC. This plan has established as priorities work on low barrier housing, improving access to “mainstream services” (generally, basic human services programs of the U.S. Department of Health and Human Services administered through the states and counties) and improving their data collection system.

Lakewood, Tacoma and Pierce County adopted a *Ten-Year Plan to End Chronic Homelessness* in 2004, and are represented on the Homeless Coalition to collaborate in reducing chronic homelessness. The plan describes a need for therapeutic treatment and case management services for the mentally ill and substance abusing populations, linking housing with services, creating low cost permanent supportive housing and creating systems changes through education and advocacy.

Through the Human Services Program, funds are made available to provide transitional and emergency housing for homeless individuals and families, assist with finding housing for individuals with special needs, and shelter for domestic violence victims and families. Agencies providing these services include the Lakewood Area Shelter Association, Korean Women’s Association, The Rescue Mission, Catholic Community Services, Tacoma Area Coalition of Individuals with Disabilities, and the YWCA.

ANTI-POVERTY STRATEGY

The City will continue to support programs and projects which assist very low and low income families and children in breaking out of poverty, support education and training opportunities to aid in obtaining livable-wage jobs, assist with providing a continuum of housing and affordable

housing, assist with providing access to health care and activities to support senior citizens on a limited fixed income. The City works in partnership with the City of Tacoma and Pierce County to coordinate efforts when appropriate, for implementation of this strategy is based upon a combination of local, state and federal resources as well as private funding and other support.

COORDINATION OF SERVICES

Human Services Coordination

In 2011 the City will provide \$366,000 of the City's General Fund for human services programs whose focus is on basic needs (food, health, and housing), safety and education. Funding through the City's General Fund Human Services Program include the following:

Agency	Program	Strategic Priority	Funded Amount	# of Lakewood Residents Expected to Serve
Emergency Food Network	Warehouse Distribution	BASIC NEED	22,500.00	5540
Caring for Kids	Ready to Learn Fair	BASIC NEED	22,000.00	2000
LASA	E&T Housing	BASIC NEED	20,800.00	18
Tacoma Rescue Mission	Family Shelter	BASIC NEED	10,000.00	20
Tillicum Community Center	Emergency Services	BASIC NEED	9,900.00	1500
St. Leo Food Connection	Springbrook Mobile Food	BASIC NEED	9,500.00	300
FISH Food Banks of Pierce County	Basic Nutritional Food Assistance	BASIC NEED	9,000.00	1600
Catholic Community Services	Phoenix Housing Network	BASIC NEED	7,000.00	18
LASA	Emergency Outreach	BASIC NEED	5,600.00	55
TACID	HELP	BASIC NEED	4,000.00	20
St. Leo Food Connection	Summer Meals Program	BASIC NEED	3,500.00	300
Rebuilding Together South Sound	Home Modifications	BASIC NEED	3,100.00	3
Pierce College	Lakewood Computer Clubhouse	EDUCATION	20,000.00	70
Clover Park School District	Lakewood Early Learning	EDUCATION	20,000.00	50
Boys & Girls Club	Delinquency Prevention	EDUCATION	20,000.00	250
Communities in Schools	After-School	EDUCATION	15,900.00	250
Communities in Schools	CHAMPIONS Mentor	EDUCATION	13,000.00	80
Pierce County AIDS	Oasis	EDUCATION	13,000.00	50
Pierce County Community Services	ChildReach	EDUCATION	9,000.00	35
Metropolitan Development Council	Lakewood Family Support Center	EDUCATION	8,700.00	35
Mary Bridge	BRIDGES	EDUCATION	7,500.00	15
TACID	Access	EDUCATION	3,500.00	35
Lakewood's Promise	Promise (Operating Expenses)	EDUCATION	10,000.00	48
Franciscan Foundation	Children's Immunization	HEALTH	18,900.00	300

Pierce County AIDS	Case Management	HEALTH	13,500.00	35
Community Health Care	PMC - Lakewood Clinic	HEALTH	10,900.00	70
TPCHD	Access to Care Dental Outreach	HEALTH	10,500.00	100
Community Health Care	PMC - Tillicum Clinic	HEALTH	10,000.00	70
YWCA Pierce County	Legal Services	SAFETY	12,500.00	30
Korean Women's Association	We Are Family	SAFETY	10,000.00	10
YWCA Pierce County	Children's Program	SAFETY	7,500.00	35
YWCA Pierce County	Women's Shelter	SAFETY	4,700.00	20
TOTAL FUNDING			\$366,000.00	

Other Local Governments

In preparing the Five Year FY 2010-2014 Joint Consolidated Plan, the City of Lakewood coordinated with Pierce County in the area of homeless data collection, (a twenty-four hour count of homeless individuals conducted by the Homeless Coalition) and special needs information available only at the county-wide level. The 2011 count was conducted on January 28th and 29th, 2010, revealing there were 1,807 homeless women, men and children in Pierce County. In addition, the City of Lakewood coordinates with Pierce County, City of Tacoma, Greater Pierce County Network, and Tacoma-Pierce County Health Department in implementing outcome performance measurements for social service agencies receiving funding from these funders. The City works with the Tacoma-Pierce County Health Department on outreach and education of lead based paint hazards and poisons relative to data on children identified with lead poison. The City and Health Department have conducted presentations before citizens groups on the effects of lead poisoning and prevention measures.

The City of Lakewood, the City of Tacoma, Pierce County, Pierce County Housing Authority and local non-profits continue to coordinate for the development and/or rehabilitation of affordable housing opportunities.

Pierce County Housing Authority

Pierce County Housing Authority manages a number of programs such as scattered site public housing, Section 8 tenant-based certificates and vouchers and enterprise fund apartments, and works in the community in other ways to provide affordable housing and bring stability to neighborhoods.

The City's Down Payment Assistance program brochures are made available at the Public Housing Authority to promote and publicize to Housing Authority tenants the availability of down payment assistance for homeownership. City staff is made available to answer questions about the program on eligibility, loan terms, credit and housing counseling.

Low-Income Public Housing Program

The Pierce County Housing Authority manages 128 units of public housing in Pierce County. These are 3-bedroom and 4-bedroom single family houses located throughout the County outside of the Tacoma city limits. Only one of these houses is located in Lakewood (west Lakewood), but vacant units are available to anyone qualifying on the wait list for housing. All units are family housing; none are specifically designated for the elderly or disabled.

Scattered Site Public Housing by Size of Unit
Pierce County January 2011

Number of Bedrooms						Total Units
0	1	2	3	4	5	
			111	17		128

Source: Pierce County Housing Authority.

Under the Public Housing Homeownership Program, tenants can sometimes buy the home in which they are living. The Pierce County Housing Authority works with qualified tenants who are first-time buyers. Under this program, tenants can pay up to 35 percent of their adjusted income toward principal and interest for the home. The first mortgage is carried by a commercial lender with a silent second mortgage carried by the Housing Authority. Proceeds from sales of units may be used by the Housing Authority to meet the housing needs of low-income people in the County. Some of the money has been allocated in the past for capital improvements of affordable apartments owned by the Housing Authority.

The Pierce County Housing Authority owns and operates 407 apartment units in Lakewood as follows: Enterprise Fund Apartments in Lakewood

Brookridge 7320 146 th St. SW Built 1976, purchased 1991 Condition: good	69 units 36- 1 bedroom 32- 2 bedroom 1-3 bedroom
Eagle's Lair 12710 56 th Ave. Ct. SW Built 1985 Condition: good	54 units 36- 1 bedroom 18- 2 bedroom
Evergreen Court 12809 47 th Ave. SW Built 1954 Condition: good	40 units 21- 1-bedroom 19- 2-bedroom
Lakewood Village 9100 Lakewood Dr. SW Built 1995 (turnkey) Condition: fair	136 units 30- 1 bedroom 76- 2 bedroom 30- 3 bedroom
Lonestone 5218 Chicago Ave. SW Built 1970 Condition: good	28 units 20- 1 bedroom 8- 2 bedroom
Oak Leaf 4111 110 th St. SW Built 1967, purchased 1982 Condition: good	26 units 26- 1 bedroom
Montgrove Manor 4001 109 th St. SW Built 1969 Condition: fair	16 units 16-2 bedroom
Village Square 10810 Lakeview Avenue SW Built 1978, purchased 1992 Condition: Fair	38 units 20- 1 bedroom 18- 2 bedroom

FAIR HOUSING

The City's most recent Analysis of Impediments to Fair Housing (May 2010) identified needs to support education on fair housing practices and responsibilities, develop partnerships to reduce impediments, and reduce acts which limit housing choice. Activities undertaken in support of Fair Housing are discussed under Housing and Community Development Activities, Chapter III of the 2011 Annual Action Plan.

BARRIERS TO AFFORDABLE HOUSING

The barriers to affordable housing in Lakewood, as in other substantially developed communities, are a combination of low household income relative to housing costs (particularly for homeownership), the regional nature of the economy and transportation system in Puget Sound that promotes commuting between work and home, the lack of low-cost vacant land for development, and the lack of economic incentives for the private market to rehabilitate failing housing stock, particularly rental housing. Although housing prices have dropped significantly with the recent sluggish economy, so have the incomes of many of Lakewood's low-and moderate-income individuals, making it difficult, often impossible, to take advantage of newly affordable homes. Increasing foreclosure rates and an unwillingness by banking institutions to lend money is also a contributing factor in keeping homeownership just out of reach for many. Foreclosure rates are expected to remain high through 2011 and into 2012 due to high unemployment rates and an inability by many homeowners to refinance their mortgage as their current loan values often exceed the property value.

Regulatory Barriers

The Washington State Growth Management Act (GMA) contains the following housing goal:¹

Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

The State requires that comprehensive plans and development regulations comply with the Growth Management Act. Lakewood's first comprehensive plan was adopted in June 2000 and development regulations were adopted in 2002. The City of Lakewood undertook a review of the plan and regulations in 2009, consistent with State requirements, and continues to do so. Recently, the City has updated its plan on a number of policies encouraging infill housing, zoning to permit higher densities, and strategies and partnerships to increase affordable, safe and adequate housing.

Low Household Income

Median household income in Lakewood was \$45,096 (2005-2007 American Community Survey), 16.4% below that in the State of Washington and 17.2% below that in Pierce County. One-quarter of the households in Lakewood had incomes below \$25,000 a year, compared to one-fifth of households in the State of Washington. The 2005-2007 American Community Survey found 16% of Lakewood residents living in poverty during the previous 12 months, 25% higher than in Washington State and 31.2% higher than in Pierce County. However, there are

¹ RCW 36.70A.020

tremendous extremes in income in Lakewood. More than three-quarters of the households in the areas of Tillicum/Woodbrook and Springbrook have incomes below 80% of the area median family income. Most other areas in which more than half of the households had low incomes were found in east Lakewood along the I-5 corridor. These low-income areas (primarily along the I-5 corridor) are contrasted by significantly more prosperous neighborhoods that have developed over the years around the lakes in central Lakewood.

Costs of Housing and Housing Development

Even though median rental costs were lower in Lakewood than in the State (by 9.2%) and the County (11.4%), median monthly owner costs were mixed- 2% lower than the County and 2% higher than the State (American Community Survey 2005-2007). Although median house prices have fallen in recent years (\$220,000 in the last quarter of 2009), the value of single family property in Lakewood and throughout the greater Puget Sound area, from Pierce County north through Snohomish County, has been subject to strong inflationary pressure over the past decade. While existing housing stock in Lakewood has increased an overall decrease in housing values in recent years, the overall effect of accumulated price inflation regionally is being felt in Lakewood. Even with declining house prices, housing is still not affordable to first-time buyers at median income. This calculation, based on 85% of the median home price, 70% of median household income, 10% down, and a 30-year fixed mortgage with private mortgage insurance would leave first-time house buyers in Pierce County with only 89% of what they needed to purchase the home. In addition, where existing housing is demolished and new housing is built, single family homes are typically being increased in size and amenities, which contributes to pricing these units beyond the affordability of median income families.

The cost of new development or redevelopment is subject to the same constraints of higher materials and labor costs in Lakewood as in other communities. The areas of the City in which land and real estate are most affordable are also the areas that present the greatest difficulty for new development and the fewest incentives for investment. Development of new housing in Lakewood is inflated by the cost of infrastructure, including remedying water lines for re-looping, inadequate sewer systems, and reconstructing roads, sidewalks and storm drainage in some areas.

The City hopes to meet some of the challenges to development of affordable housing in Lakewood through policies outlined in the Comprehensive Plan. The City has been successful in securing funding and support for constructing a sewer system in Tillicum/Woodbrook, and for making other infrastructure improvements to encourage investment in Lakewood. Small developers, in particular, have concerns including delays in sewer permitting, difficulty in obtaining insurance on multifamily complexes, lack of knowledge or expertise to take advantage of strategies proposed by the City, and competition of small and non-profit developers with larger developers.

Quality of Housing Stock

The quality of the City's housing stock varies by type and by location. Single family homes in much of the City are in good condition, roughly three-quarters of housing was built after 1960. Only two areas have a relatively high percentage of single family homes in need of substantial repair, Tillicum/American Lake Gardens and Lakeview. On the other hand, conditions in much of the City's multifamily housing stock are deteriorated. Conditions in the City's mobile home parks are perhaps the worst of all – a significant number of units included in these parks need replacement and would not survive relocation.

Lakewood also has more multifamily housing (42% of the total units) and less single family (54% of the total units) than the State's 66% single family and 27% multifamily (American Community Survey 2005-2007). The construction of multifamily units was in part a market response to the demand for military personnel for off-base housing in Lakewood. In total, 49% of Lakewood housing was rented as of the 2005-2007 American Community Survey. Rents in Lakewood were low in 2008 and 2009 compared to the County, and vacancy rates were slightly higher (Washington Center for Real Estate Research, Central Puget Sound Real Estate Research Report, Year-End 2009). The result of higher vacancy rates and lower rents tends to discourage investment in new construction or rehabilitation.

Low rents and poor housing conditions in some of areas of Lakewood have contributed to higher crime, including drug-related activities. Concern about public safety and crime, in turn, contribute to instability in neighborhoods. The City has made safe neighborhoods and crime reduction a priority since incorporation in 1996.

LISTING OF PROPOSED PROJECTS

The following represents the proposed use of funds for Fiscal Year 2011 under the CDBG and HOME programs. The projects and programs are listed by program below and further described separately on subsequent pages. Specific project information includes:

1. A brief description of an activity or project;
2. The HUD activity code which most closely identifies what will be done with the funding.
3. The eligibility codes from the federal CDBG regulations
4. The benefit codes from the federal CDBG regulations
5. The funding sources by program (e.g. CDBG, HOME) and
6. The proposed accomplishments.

**CDBG PROGRAM YEAR 2011 and REPROGRAMMED UNEXPENDED FY 2008
PROPOSED USE OF FUNDS***

	Amount Requested	CAB RECOMMENDATIONS		
		CDBG FY 2011	CDBG Reprogram *FY 2008	CDBG FY 2011 & Reprogram FY 2008 TOTAL
ECONOMIC DEVELOPMENT				
CCD/Seattle Economic Development Fund – Business Loan Program	\$100,000.00	\$94,216.70		\$94,216.70
Subtotal- Economic Development	\$100,000.00	\$94,216.70		\$94,216.70
PUBLIC SERVICE (15% Cap)				
Tillicum Comm. Ctr. Operations	\$89,400.00	\$76,627.14		\$76,627.14
South Sound Outreach Services – Financial and Housing Counseling Program	\$11,058.00	\$10,039.56		\$10,039.56
Subtotal- Public Service	\$100,458.00	\$86,666.70		\$86,666.70
PHYSICAL IMPROVEMENTS				
Habitat for Humanity – Washington Avenue Sewer Extension	\$115,000.00	\$108,349.00		\$108,349.00
Subtotal- Physical Improvements	\$115,000.00	\$108,349.00		\$108,349.00
HOUSING				
Associated Ministries – Paint Tacoma-P.C. Beautiful	\$7,500.00	\$7,066.00		\$7,066.00
Major Home Repair/Sewer Loan Program	\$150,000.00	\$98,229.00	\$45,741.67	\$143,970.67
City of Lakewood Parks Department – Emergency Assistance for Displaced Residents	\$20,000.00	\$18,843.00		\$18,843.00
Pierce County Housing Authority – Brookridge Apartments Sewer Design	\$36,850.00	\$34,719.00		\$34,719.00
Rebuilding Together South Sound	\$15,000.00	\$14,133.00		\$14,133.00
Subtotal- Housing	\$229,350.00	\$172,990.00		\$218,731.67
OTHER/ADMIN (20% Cap)				
Administration	\$128,000.00	\$115,555.60		\$115,555.60
Subtotal- Administration	\$128,000.00	\$115,555.60		\$115,555.60
Contingency (5% Max.)	\$17,933.67	\$0.00		\$0.00
Subtotal- Contingency	\$17,933.67	\$0.00		\$0.00
TOTAL	\$690,741.67	\$577,778.00	\$45,741.67	\$623,519.67
*REPROGRAMMED UNEXPENDED FY 2008 CDBG FUNDS				
		FY 2008		
FY 2008 Tillicum Community Center		\$1,481.79		
FY 2008 Administration		\$18,994.01		
FY 2008 LASA Client Services Center		\$25,000.00		
FY 2008 City of Lakewood – Low-Income Street Lighting		\$265.87		
TOTAL FUNDS		\$45,741.67		

FY 2011 HOME- Lakewood's share*		
HOUSING	FY 2011	TOTAL
Administration (10% Tacoma)	\$39,751.90	\$39,751.90
Housing Rehabilitation	\$97,171.36	\$97,171.36
Affordable Housing	\$260,595.74	\$260,595.74
TOTAL	\$397,519.00	\$397,519.00

The City of Lakewood's portion of the Tacoma / Lakewood HOME consortium proposed use of HOME funds are described in the Tacoma's element of the Joint Tacoma / Lakewood Consolidated Plan. Funds are allocated for rehabilitation and preservation of housing with deferred maintenance. Funds will also support the acquisition, construction and/or rehabilitation of affordable housing for low-income rentals and/or to facilitate new homeownership opportunities.

*Note: The proposed FY 2011 CDBG and HOME funding allocations are estimates only. Final program allocations shall be adjusted proportionately to final CDBG and HOME allocations.

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – Economic Development Business Loan Program

Outcome Measure: Sustainability for the purpose of providing economic opportunities.

Outcome Indicator: Number of jobs created or retained for low-and moderate-income persons.

Expected Units: FY 2011 – 3 Jobs created or retained

Project Description – Provide for the creation of a low-interest business loan and technical assistance program for the purpose of creating and/or retaining low-income jobs. Funding will assist 3 microenterprises with start-up or development of existing businesses.

Location - City-wide. Locations to be determined.

Objective Number	Project ID FY 2011-01
HUD Matrix Code 18C Micro-Enterprise Assistance	CDBG Citation 570.201 (o) Economic Development
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (4) Job Creation or Retention
Start Date 07/01/2011	Completion Date 6/30/12
Performance Indicator 13 Jobs	Annual Units 3
Local ID FY 2011-01	Units Upon Completion

Funding Sources:	Amount
CDBG \$94,216.70
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding 75,000.00
Total \$169,216.70

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – Tillicum/American Lake Gardens Community Service Center

Priority Need – Benefit Low/moderate income persons

Activity Title – Operations

Outcome Measure: Accessibility for the purpose of creating a suitable living environment.

Outcome Indicator: Number of persons having new access to a community center facility for the purpose of providing a suitable living environment.

Expected Units: FY 2011- 3,922 People

Project Description – Provides for 1,920 hours of operation of a neighborhood community center located in a low-income residential neighborhood at 14916 Washington Avenue SW, Lakewood for a senior meal site, food bank, clothing exchange, medical clinic, Women, Infant, Children (WIC) program, and library.

Location -

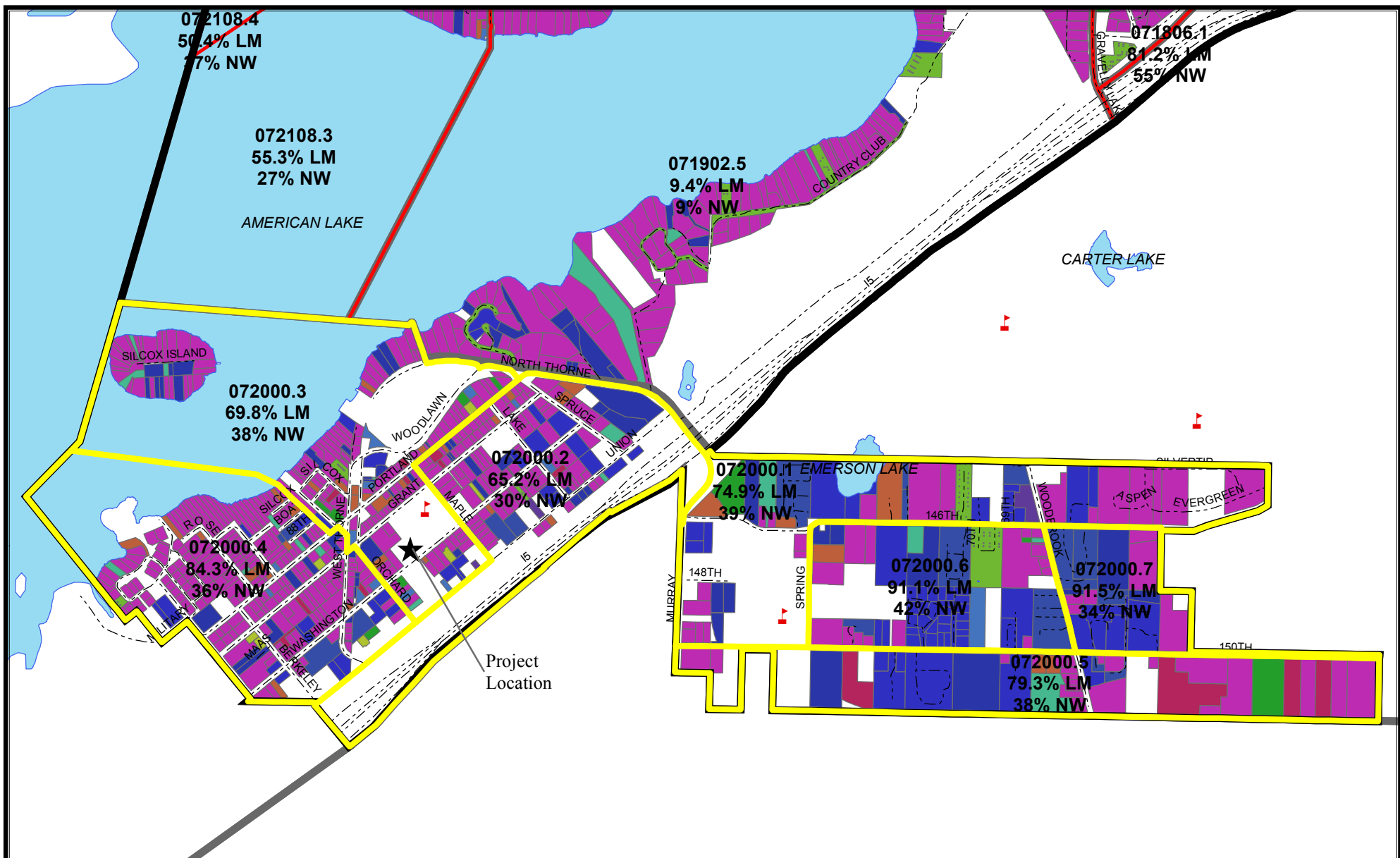
Population is 3,922 (low/mod) divided by 4,865 (total) = **80.6% low/mod.**

Service area consists of CT 72000 - 804 (residential) parcels divided by 924 (total) parcels = **87.01% residential.**

Objective Number	Project ID FY 2011-02
HUD Matrix Code 05 Public Services General	CDBG Citation 570.201 (e) Public Services
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (1) Low/Mod Area Benefit
Start Date 07/01/11	Completion Date 06/30/12
Performance Indicator 01 People	Annual Units 3,922
Local ID FY 2011-02	Units Upon Completion

Funding Sources:	Amount
CDBG	\$76,627.14
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding	\$137,153.00
Total	\$213,780.14

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs



All Census Data is based on 2000 Census
 Service Area Boundary is Census Tract: 72000
 87.01 % Residential - (based on parcel area by existing land use code)
 80.6 % LOW/MOD

City of Lakewood
Tillicum/ALG Community Service Center
 (FY 2011-02)
Area Benefit Objective

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 January 24, 2011 :projects\clerk\cdg\projectmaps\2011-02ExistingLuse_mrs.mxd



- | | | |
|-------------------------|----------------------------------|------------------------------------|
| School | Existing Land Use | Single Family Listed as Condo |
| Arterial | Other Residential | Duplex Listed as Condo |
| City Limit | Single Family | Triplex Listed as Condo |
| 2000 Census Block Group | Duplex | Fourplex Listed as Condo |
| 2000 Census Tract | Triplex | Five or More Units Listed as Condo |
| Lake | Fourplex | Offices Listed as Condo |
| Service Area | Five or More Family Units | Mobile Home Park |
| | Mobile Home | Retirement Home |
| | Mobile Home Elimination of Title | Other Group Quarters |
| | Commercial Land with SFR | Residential Vacant Land |

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – South Sound Outreach Services

Priority Need – Benefit Low/moderate income persons

Activity Title – Financial and Housing Counseling Program

Outcome Measure: Accessibility for the purpose of providing decent affordable housing.

Outcome Indicator: Number of households having access to affordable housing through fair housing activities for the purpose of providing decent affordable housing.

Expected Units: FY 2011- 54 households

Project Description – Provides for housing counseling assistance to Lakewood seniors and individuals with disabilities, allowing them to regain and maintain financial and housing stability through targeted workshops and HUD-approved foreclosure intervention and financial counseling.

Location – City-wide. Locations to be determined.

Objective Number	Project ID FY 2011-03
HUD Matrix Code 05U Housing Counseling	CDBG Citation 570.201 (e) Public Services
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (2) Limited Clientele
Start Date 07/01/11	Completion Date 06/30/12
Performance Indicator 04 Households	Annual Units 54
Local ID FY 2011-03	Units Upon Completion

Funding Sources:	Amount
CDBG	\$10,039.56
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$126,302.00
Total	\$136,341.56

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – Tacoma-Pierce County Habitat for Humanity

Priority Need – Benefit Low/moderate income persons

Activity Title – Washington Avenue Sewer Extension

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of households having access to a new infrastructure service, including sewer connections for single-family owner-occupied units in targeted areas for the purpose of providing a suitable living environment.

Expected Units: FY 2011- 3,922 People

Project Description – Construction of approximately 900 linear feet of sanitary sewer mains along Washington Avenue between Spruce Street and 14500 block of Washington Avenue. Installation to include 8” sewer mains and the replacement of all disturbed roadway.

Location – Washington Avenue from Spruce Street to the 14500 block of Washington Avenue.

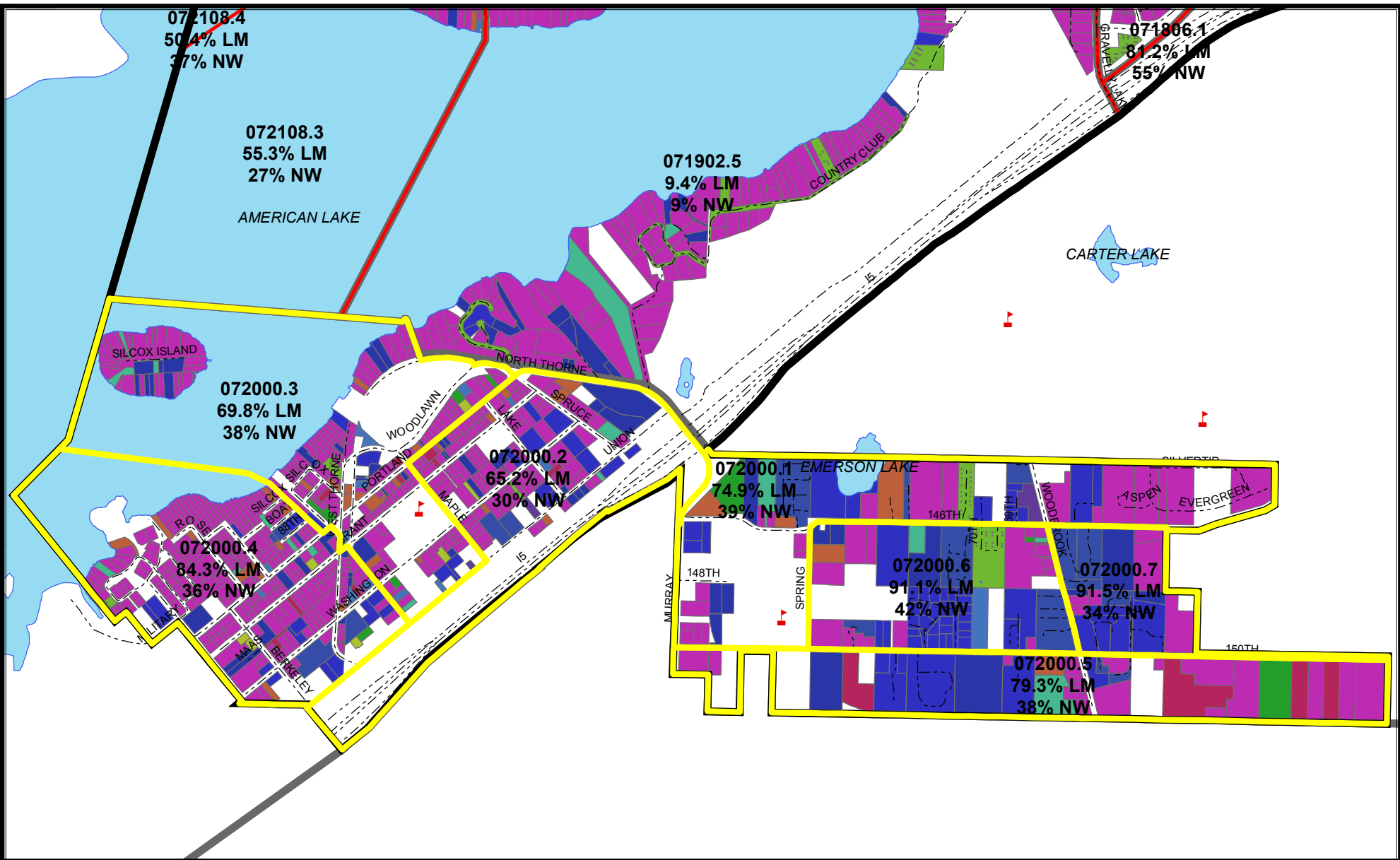
Population is 3,922 (low/mod) divided by 4,865 (total) = **80.6% low/mod.**

Service area consists of CT 72000 - 804 (residential) parcels divided by 924 (total) parcels = **87.01% residential.**

Objective Number	Project ID FY 2011-04
HUD Matrix Code 03J Sewer Improvements	CDBG Citation 570.201 (c) Public Facilities and Improvements
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (1) Area Benefit
Start Date 07/01/11	Completion Date - 6/30/12
Performance Indicator 01 People	Annual Units 3,922
Local ID FY 2011-04	Units Upon Completion

Funding Sources:	Amount
CDBG	\$108,349.00
ESG	
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	\$60,000.00
Total	\$168,349.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs



All Census Data is based on 2000 Census
 Service Area Boundary is Census Tract: 72000
 87.01 % Residential - (based on parcel area by existing land use code)
 80.6 % LOW/MOD

**City of Lakewood
 Tacoma-Pierce County Habitat For Humanity
 Washington Ave Sewer Extension
 (FY 2011-04)
 Area Benefit Objective**

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- | | | |
|-------------------------|----------------------------------|------------------------------------|
| School | Existing Land Use | Single Family Listed as Condo |
| Arterial | Other Residential | Duplex Listed as Condo |
| City Limit | Single Family | Triplex Listed as Condo |
| 2000 Census Block Group | Duplex | Fourplex Listed as Condo |
| 2000 Census Tract | Triplex | Five or More Units Listed as Condo |
| Lake | Fourplex | Offices Listed as Condo |
| Service Area | Five or More Family Units | Mobile Home Park |
| | Mobile Home | Retirement Home |
| | Mobile Home Elimination of Title | Other Group Quarters |
| | Commercial Land with SFR | Residential Vacant Land |

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – Associated Ministries

Priority Need – Benefit Low/moderate income persons

Activity Title – Paint Tacoma – Pierce Beautiful

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent and 50 percent area median income elderly owner-occupied homeowners that have sustainable affordable housing painted by volunteer work crews due to deferred maintenance for the purpose of providing decent affordable housing.

Expected Units: FY 2011- 8 Housing Units

Project Description –Administration services to organize volunteer program for exterior painting of 8 Lakewood low-income elderly and/or disabled homeowners.

Location - Lakewood – Homes to be determined

Objective Number	Project ID FY 2011-05
HUD Matrix Code 14H Rehab. Admin.	CDBG Citation 570.202 Housing Rehab and Preservation
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (3) Low/Mod Housing
Start Date 07/01/11	Completion Date 06/30/12
Performance Indicator 10 Housing Units	Annual Units 8
Local ID FY 2011-05	Units Upon Completion

Funding Sources:	Amount
CDBG \$7,066.00
ESG
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding \$189,104.00
Total \$196,170.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3
Consolidated Plan Listing of Projects**

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – Major Home Repair/Sewer Loan Program

Major Home Repair Program

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation, including access to sewer connections, for the purpose of providing decent affordable housing.

Sewer Loan Program

Outcome Measure: Accessibility for the purpose of creating suitable living environments.

Outcome Indicator: Number of households having access to a new infrastructure service, including sewer connections for single-family owner-occupied units in targeted areas for the purpose of providing a suitable living environment.

Expected Units: FY 2011 – 10 Major Home Repair/Sewer Loan Program Housing Units

Project Description – Provides 10 major home repairs/sewer connection loans which include connection of side-sewers to sewer main, decommissioning of septic systems, roofing, architectural barrier removal, plumbing, electrical, weatherization, major systems replacement/upgrade, etc. for low-income homeowners.

Location - City-wide. Locations to be determined.

Objective Number	Project ID FY 2011-06
HUD Matrix Code 14A Rehab Single Unit Residential	CDBG Citation 570.202 Housing Rehab & Preservation
Type of Recipient Local Government	CDBG National Objective 570.208 (a) (3) Low/mod Housing
Start Date 07/01/11	Completion Date - 6/30/12
Performance Indicator 10 Housing Units	Annual Units 10
Local ID FY 2011-06	Units Upon Completion

Funding Sources:	Amount
CDBG	\$98,229.00
ESG	
HOME	
HOPWA	
Total Formula	
CDBG Reprogrammed 2008	\$45,741.67
Assisted Housing	
PHA	
Other Funding	
Total	\$143,970.67

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood- Parks Department

Priority Need – Benefit Low/moderate income persons

Activity Title – Emergency Assistance for Displaced Residents

Outcome Measure: Accessibility for the purpose of providing decent affordable housing.

Outcome Indicator: Number of households having access to affordable housing through fair housing activities for the purpose of providing decent affordable housing.

Expected Units: FY 2011- 15 Households

Project Description – Program provides emergency and permanent housing for 15 Lakewood households displaced through no fault of their own during building and code enforcement closures, fires, and other incidences creating homelessness.

Location – City-wide. Locations to be determined.

Objective Number	Project ID FY 2011-07
HUD Matrix Code 08 Relocation	CDBG Citation 570.201 (i) Relocation
Type of Recipient Local Government	CDBG National Objective 570.208 (a) (2) Limited Clientele
Start Date 07/01/11	Completion Date 06/30/12
Performance Indicator 04 Households	Annual Units 15
Local ID FY 2011-07	Units Upon Completion

Funding Sources:	Amount
CDBG \$18,843.00
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding \$10,000.00
Total \$28,843.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – Pierce County Housing Authority

Priority Need – Benefit Low/moderate income persons

Activity Title – Brookridge Apartments Sewer Design

Outcome Measure: Affordability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of households that have access to affordable housing through a collaborative effort to develop and implement strategies to preserve affordable housing for the purpose of providing decent affordable housing.

Expected Units: FY 2011 – 69 Rental Housing Units

Project Description – Provides for the design and permit review requirements for the installation of a sewer mainline extension and side sewers at the Brookridge Apartment complex. Connections would provide for an 8” mainline and 6” side sewer connections to all 14 buildings of the 69 unit apartment community.

Location - 7330 146th St. SW, Lakewood

Objective Number	Project ID FY 2011-08
HUD Matrix Code 14D Rehab Publicly- Owned Residential Bldg.	CDBG Citation 570.202 Housing Rehab & Preservation
Type of Recipient Public Housing Authority	CDBG National Objective 570.208 (a) (3) Low/mod Housing
Start Date 07/01/11	Completion Date 6/30/12
Performance Indicator 10 Housing Units	Annual Units 69
Local ID FY 2011-08	Units Upon Completion

Funding Sources:	Amount
CDBG	\$34,719.00
ESG	
HOME	
HOPWA	
Total Formula	
Assisted Housing	
PHA	
Other Funding	
Total	\$34,719.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – Rebuilding Together South Sound

Priority Need – Benefit Low/moderate income persons

Activity Title – Rebuilding Together South Sound

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation for the purpose of providing decent affordable housing.

Expected Units: FY 2011 – 7 Housing Units

Project Description – Program funding will assist low-income seniors, disabled persons or families with children maintain their homes and make necessary repairs due to deferred maintenance, make accessibility improvements, emergency repairs and general rehabilitation.

Location - City-wide. Locations to be determined.

Objective Number	Project ID FY 2011-09
HUD Matrix Code 14A Rehab Single Unit Residential	CDBG Citation 570.202 Housing Rehab & Preservation
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (3) Low/mod Housing
Start Date 07/01/11	Completion Date – 6/30/12
Performance Indicator 10 Housing Units	Annual Units 7
Local ID FY 2011-09	Units Upon Completion

Funding Sources:	Amount
CDBG	\$14,133.00
ESG	
HOME	
HOPWA	
Total Formula	
CDBG Prior Year	
Assisted Housing	
PHA	
Other Funding	\$276,000.00
Total	\$290,133.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – CDBG Administration

Project Description – Administration cost to support overall program management, coordination, monitoring and evaluation managed by the City of Lakewood Community Development Department.

Location - City-wide

Objective Number	Project ID FY 2011-10 Admin
HUD Matrix Code 21A	CDBG Citation 570.206 General Program Admin.
Type of Recipient Local Government	CDBG National Objective
Start Date 07/01/11	Completion Date 6/30/12
Performance Indicator N/A	Annual Units N/A
Local ID FY 2011-10 Admin	Units Upon Completion N/A

Funding Sources:	Amount
CDBG \$115,555.60
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding
Total \$115,555.60

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3
Consolidated Plan Listing of Projects**

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – CDBG Contingency

Project Description – Funding supports unanticipated costs associated with the implementation of the CDBG program managed by the Lakewood Community Development Department.

Location - City-wide

Objective Number	Project ID FY 2011 Contingency
HUD Matrix Code 22 Un-programmed Funds	CDBG Citation .
Type of Recipient Local Government	CDBG National Objective
Start Date 07/01/11	Completion Date 6/30/12
Performance Indicator N/A	Annual Units N/A
Local ID FY 2011 Contingency	Units Upon Completion N/A

Funding Sources:	Amount
CDBG \$0.00
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding
Total \$0.00

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3
Consolidated Plan Listing of Projects**

Subrecipient or Agency Name – Tacoma-Pierce County Habitat for Humanity

Priority Need – Benefit Low/moderate income persons

Activity Title – Neighborhood Revitalization Initiative Rehab and Repair Program (ALTERNATE #1)

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation for the purpose of providing decent affordable housing.

Expected Units: FY 2011 – 8 Housing Units

Project Description – Provides rehabilitation and repair assistance for low-income homeowners in the Tillicum neighborhood.

Location - Census Block Groups- 72000.2, 72000.3 and 72000.4

Objective Number	Project ID FY 2011- Alternate #1
HUD Matrix Code 14A Rehab Single Unit Residential	CDBG Citation 570.202 Housing Rehab & Preservation
Type of Recipient Non-Profit	CDBG National Objective 570.208 (a) (3) Low/mod Housing
Start Date 07/01/11	Completion Date 6/30/12
Performance Indicator 10 Housing Units	Annual Units 8
Local ID FY 2011- Alternate #1	Units Upon Completion

Funding Sources:	Amount
CDBG
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding
Total

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood Public Works Department

Priority Need – Benefit Low/moderate income persons

Activity Title – Grant Avenue Sewer Extension- Phase II (ALTERNATE #2)

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of households having access to a new infrastructure service, including sewer connections for single-family owner-occupied units in targeted areas for the purpose of providing a suitable living environment.

Expected Units: FY 2011- 3,922 People

Project Description – Construction of approximately 500 linear feet of sanitary sewer mains along Grant Avenue between Boundary Street and Berkeley Street. Installation to include the replacement of all roadways, sidewalks, curbs, storm water collection and water mains.

Location - Grant Avenue between Boundary Street and Berkeley Street

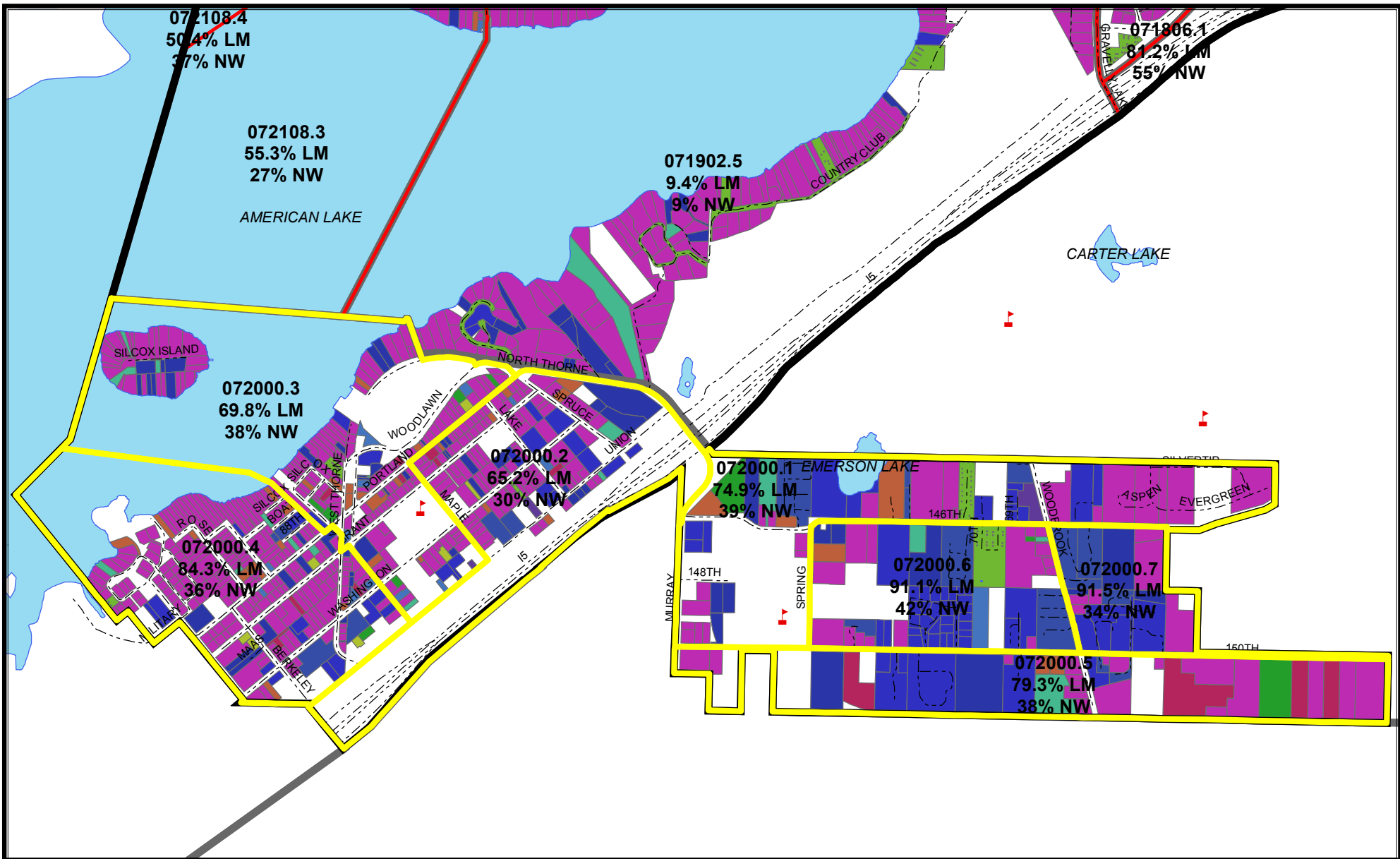
Population is 3,922 (low/mod) divided by 4,865 (total) = **80.6% low/mod.**

Service area consists of CT 72000 - 804 (residential) parcels divided by 924 (total) parcels = **87.01% residential.**

Objective Number	Project ID FY 2011- Alternate #2
HUD Matrix Code 03J Sewer Improvements	CDBG Citation 570.201 (c) Public Facilities and Improvements
Type of Recipient Local Government	CDBG National Objective 570.208 (a) (1) Area Benefit
Start Date 07/01/11	Completion Date - 6/30/12
Performance Indicator 01 People	Annual Units 3,922
Local ID FY 2011- Alternate #2	Units Upon Completion

Funding Sources:	Amount
CDBG
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding
Total

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs



All Census Data is based on 2000 Census
 Service Area Boundary is Census Tract: 72000
 87.01 % Residential - (based on parcel area by existing land use code)
 80.6 % LOW/MOD

City of Lakewood
Public Works Department
Grant Ave Sewer Extension Phase II
(FY 2011- Alt. 2)
Area Benefit Objective

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 January 24, 2011 :projects\clerk\cdg\projectmaps\2011-Alt2ExistingLuse_mrs.mxd



- | | | |
|-------------------------|----------------------------------|------------------------------------|
| School | Existing Land Use | Single Family Listed as Condo |
| Arterial | Other Residential | Duplex Listed as Condo |
| City Limit | Single Family | Triplex Listed as Condo |
| 2000 Census Block Group | Duplex | Fourplex Listed as Condo |
| 2000 Census Tract | Triplex | Five or More Units Listed as Condo |
| Lake | Fourplex | Offices Listed as Condo |
| Service Area | Five or More Family Units | Mobile Home Park |
| | Mobile Home | Retirement Home |
| | Mobile Home Elimination of Title | Other Group Quarters |
| | Commercial Land with SFR | Residential Vacant Land |

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – Major Home Repair/Sewer Loan Program (ALTERNATE #3)

Major Home Repair Program

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation, including access to sewer connections, for the purpose of providing decent affordable housing.

Sewer Loan Program

Outcome Measure: Accessibility for the purpose of creating suitable living environments.

Outcome Indicator: Number of households having access to a new infrastructure service, including sewer connections for single-family owner-occupied units in targeted areas for the purpose of providing a suitable living environment.

Expected Units: FY 2011 – 10 Major Home Repair/Sewer Loan Program Housing Units

Project Description – Provides 10 major home repairs/sewer connection loans which include connection of side-sewers to sewer main, decommissioning of septic systems, roofing, architectural barrier removal, plumbing, electrical, weatherization, major systems replacement/upgrade, etc. for low-income homeowners.

Location - City-wide. Locations to be determined.

Objective Number	Project ID FY 2011- Alternate #3
HUD Matrix Code 14A Rehab Single Unit Residential	CDBG Citation 570.202 Housing Rehab & Preservation
Type of Recipient Local Government	CDBG National Objective 570.208 (a) (3) Low/mod Housing
Start Date 07/01/11	Completion Date - 6/30/12
Performance Indicator 10 Housing Units	Annual Units 10
Local ID FY 2011- Alternate #3	Units Upon Completion

Funding Sources:	Amount
CDBG
ESG
HOME
HOPWA
Total Formula
CDBG Prior Year Funds
Assisted Housing
PHA
Other Funding
Total

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – HOME Housing Rehabilitation and Affordable Housing Projects

Outcome Measure: Sustainability for the purpose of providing decent affordable housing.

Outcome Indicator: Number of 30 percent, 50 percent, and 80 percent area median income households that have sustainable affordable housing brought to code by major rehabilitation for the purpose of providing decent affordable housing:

Expected Units: FY 2011 – 5 Housing Units

THIS HOME PROJECT IS INCLUDED IN THE CITY OF TACOMA ELEMENT OF THE JOINT TACOMA/LAKEWOOD CONSOLIDATED ACTION PLAN AS PART OF THE HOME CONSORTIUM.

Project Description – Deferred and low interest loans to low income homeowners for housing rehabilitation.

Location- Lakewood – Homes to be determined

Objective Number	Project ID FY 2011-HOME Housing Rehab
HUD Matrix Code N/A	HOME Citation 92.206 (a)
Type of Recipient Local Government	CDBG National Objective N/A
Start Date 07/01/11	Completion Date - 6/30/12
Performance Indicator – 10 Housing Units	Annual Units 5
Local ID FY 2011-HOME Housing Rehab	Units Upon Completion

Funding Sources:	Amount
CDBG
ESG
HOME \$97,171.36
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total \$97,171.36

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3
Consolidated Plan Listing of Projects

Subrecipient or Agency Name – City of Lakewood

Priority Need – Benefit Low/moderate income persons

Activity Title – HOME Permanent Affordable Housing

THIS HOME PROJECT IS INCLUDED IN THE CITY OF TACOMA ELEMENT OF THE JOINT TACOMA/LAKEWOOD CONSOLIDATED ACTION PLAN AS PART OF THE HOME CONSORTIUM.

Project Description –Funds will support the acquisition, construction and/or rehabilitation of affordable housing for low-income rentals and/or to facilitate new homeownership opportunities. The funds will be managed by the Tacoma Community Redevelopment Authority (TCRA) with staff support from the City of Lakewood Community Development Department.

Location - Lakewood – Location to be determined

Objective Number	Project ID FY 2011-HOME Affordable Acquisition
HUD Matrix Code 01-Acquisition, 12-Construction, 14B Rehab	HOME Citation 92.206 (c)
Type of Recipient Non-Profit	CDBG National Objective N/A
Start Date 07/01/11	Completion Date
Performance Indicator – 10 Housing Units	Annual Units 1-2
Local ID FY 2011-HOME Affordable Acquisition	Units Upon Completion

Funding Sources:	Amount
CDBG
ESG
HOME	\$260,595.74
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$260,595.74

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

SPECIFIC SUBMISSION REQUIREMENTS

Specific CDBG Submission Requirements

The following sources of CDBG funding have been allocated to projects for fiscal year 2011:

2011 Entitlement Grant \$577,778 (estimated)

Specific HOME Submission Requirements

The following sources of HOME Consortium funding including the City of Tacoma (lead entity) and City of Lakewood have been allocated to projects for fiscal year 2011

2011 HOME Consortium \$1,790,628 (estimated) -- (Lakewood estimates its allocation to be \$397,519)

Matching Funds for City of Lakewood – The HOME match is being provided by the HOME Consortium in accordance with HUD guidelines.

Resale Provisions

The City of Lakewood will use the recapture option to meet the resale requirements of the HOME program, except for cases when a development subsidy only is provided.

Tenant Based Rental Assistance

The City of Lakewood will ensure that all minimum guidelines for tenant-based rental assistance are met, if provided with HOME funds. As stated in the certification, any funds to be provided “are an essential element of Lakewood’s housing strategy for expanding the supply, affordability and availability of decent, safe, sanitary and affordable housing.”

Other Forms of Investment

The City of Lakewood uses specified forms of assistance such as equity investments, interest-bearing loans, deferred payment loans, grants and other forms of assistance.

Affirmative Marketing

The City will meet the affirmative marketing (equal opportunity/fair housing) and minority/women business outreach requirements in implementing the HOME program.

IV. FY 2008 ANNUAL ACTION PLAN THIRD AMENDMENT

INTRODUCTION

The City of Lakewood’s FY 2008 Consolidated Annual Action Plan Amendment was prepared in accordance with requirements established by the Department of Housing and Urban Development for local jurisdictions receiving Community Development Block Grant funding through the provisions of the National Affordable Housing Act of 1990, as amended

PURPOSE

The purpose of this report is to describe the amendments to the FY 2008 Consolidated Annual Action Plan and the reprogramming of Community Development Block Grant funds.

CITIZEN PARTICIPATION PROCESS

In accordance with Lakewood’s Citizens Participation Plan, projects that are substantially changed are reviewed and approved by the CDBG Citizens Advisory Board for recommendation to the City Council prior to implementation. On February 2, 2011, the CDBG Citizens Advisory Board approved the amendment to the FY 2008 Consolidated Annual Action Plan to reprogram unexpended FY 2008 Tillicum Community Center Operations, Administration, Lakewood Area Shelter Association Client Services Center and City of Lakewood Low-Income Street Lighting funds in the amount of \$45,741.67 to supplement the FY 2011 Major Home Repair/Sewer Loan Program.

Copies of the Plan were made available at Lakewood City Hall, Lakewood Library, the Tillicum Library, as well as Pierce County, City of Tacoma, and the State of Washington. The notification provided for a 30-day (April 1 – 30, 2011) citizen comment period. A public hearing was held by the Lakewood City Council on April 18, 2011 to provide an opportunity for citizens, public agencies and other interested parties to provide public comments on the FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans.

FY 2008 PROJECT ACTIVITIES AMENDMENT

The Amendment to the FY 2008 Consolidated Annual Action Plan proposes to reprogram unspent FY 2008 Tillicum Community Center Operations, Administration, Lakewood Area Shelter Association Client Services Center and City of Lakewood Low-Income Street Lighting funds as shown in the following chart:

FROM: FY 2008 Projects	Unspent Amount	REPROGRAM TO: FY 2011 Projects	Amount
Tillicum Community Center Administration	\$ 1,481.79	City of Lakewood – Major Home Repair/Sewer Loan Program	<u>\$45,741.67</u>
LASA Client Services Ctr.	\$18,994.01		
Low-Income Street Lighting	\$25,000.00		
Total	<u>\$ 265.87</u>		
	\$45,741.67	Total	\$45,741.67

V. FY 2009 AND FY 2010 ANNUAL ACTION PLAN AMENDMENTS

INTRODUCTION

The City of Lakewood’s FY 2009 and FY 2010 Consolidated Annual Action Plan Amendments were prepared in accordance with requirements established by the Department of Housing and Urban Development for local jurisdictions receiving Community Development Block Grant funding through the provisions of the National Affordable Housing Act of 1990, as amended.

PURPOSE

The purpose of this report is to describe amendments to the FY 2009 and FY 2010 Consolidated Annual Action Plans and the reprogramming of Community Development Block Grant funds.

CITIZEN PARTICIPATION PROCESS

In accordance with Lakewood’s Citizens Participation Plan, projects that are substantially changed are reviewed and approved by the CDBG Citizens Advisory Board for recommendation to the City Council prior to implementation. On February 2, 2011, the CDBG Citizens Advisory Board approved the amendment to the FY 2009 Consolidated Annual Action Plan to reprogram unexpended FY 2009 Pierce County Housing Authority Eagle’s Lair Apartments Roof Rehabilitation funds in the amount of \$32,256.00 to supplement the FY 2010 Pierce County Housing Authority Montgrove Manor Apartments Roof Rehabilitation project.

Copies of the Plans were made available at Lakewood City Hall, Lakewood Library, the Tillicum Library, as well as Pierce County, City of Tacoma, and the State of Washington. The notification provided for a 30-day (April 1 – 30, 2011) citizen comment period. A public hearing was held by the Lakewood City Council on April 18, 2011 to provide an opportunity for citizens, public agencies and other interested parties to provide public comments on the FY 2011 Annual Action Plan and FY 2008, 2009 and 2010 Amended Consolidated Plans.

FY 2009 AND FY 2010 PROJECT ACTIVITIES AMENDMENTS

The Amendments to the FY 2009 and FY 2010 Consolidated Annual Action Plans proposes to reprogram unspent FY 2009 Pierce County Housing Authority Eagle’s Lair Apartments Roof Rehabilitation funds in the amount of \$32,256.00 to supplement the FY 2010 Pierce County Housing Authority Montgrove Manor Apartments Roof Rehabilitation project as shown in the following chart:

FROM: FY 2009 Projects	Unspent Amount	REPROGRAM TO: FY 2010 Projects	Amount
PCHA Eagle’s Lair Apartments Roof Rehab. (HUD Activity #125)	<u>\$32,256.00</u>	PCHA Montgrove Manor Apartments Roof Rehab. (HUD Activity #133)	<u>\$32,256.00</u>
Total	\$32,256.00	Total	\$32,256.00

VI. APPENDICES

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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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

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, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:

(a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

Title: City Manager

Specific CDBG 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 housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 certifies that 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 activities which the grantee certifies are designed to meet other community development needs having a 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);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year 2011 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. The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 USC 2000d), the Fair Housing Act (42 USC 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/Authorized Official

Date

Title: City Manager

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

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.

Appropriate Financial Assistance -- 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/Authorized Official

Date

Title: City Manager