

Executive Summary

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

1. Introduction

The City of Mount Vernon receives an annual Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD) for community development and affordable housing needs. The City has received CDBG funds since 2004. Every five years, as a condition of receiving this federal financial assistance, the City is required by the U.S. Department of Housing and Urban Development (HUD) to prepare a "Consolidated Plan." The Consolidated plan consists of a Strategic Plan covering a three-year period, and an annual action plan during each of those three years.

The Strategic Plan brings needs and resources together in a coordinated strategy to meet housing, community development, and non-urgent needs. Developed at the commencement of each Consolidated Plan term, the Strategic Plan serves as a guide for developing the annual Action Plans.

The Strategic Plan is designed to achieve the following CDBG and National Objectives:

CDBG Objectives

- Provide decent housing
- Create suitable living environments
- Expand economic opportunities

National Objectives

- Benefit low-income* persons
- Aid in the prevention or elimination of slums or blight
- Meet a need having a particular urgency

**For the purposes of the Strategic Plan Section, the term "low-income" will include those households with income at or below 80% of the area median income.*

The basic elements of the Consolidated Plan includes: Public and Stakeholder Input - Needs Assessment - Housing Market Analysis - Strategic Plan - First-Year Action Plan.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The three-year plan goals include (A) increasing the supply of affordable rental housing, (B) maintaining existing affordable housing stock, (C) supporting public facilities for neighborhood revitalization, (D) increasing the supply of affordable owner-occupied housing through direct financial assistance to 10 low-income homebuyers, (E) supporting efforts to reduce poverty, and (F) funding supportive services for people who are homeless. See the objectives and outcomes of these goals in the table below.

Mount Vernon Consolidated Plan Goals 2015-2017				3-Year (goals, housing targets, funding)					Second Year 2016
Goal	Objective	Outcome indicator	Unit of measure	Goal	<30%AMI I	30-50% AMI	50-80% AMI	Funding	Goal
Increase supply of affordable rental housing	Provide decent affordable housing	Rental units constructed	Housing unit	10		10		\$ 50,000	5
Maintain affordable housing stock	Create suitable living environments	Rental units rehabilitated	Housing unit	20	10	10	-	\$ 91,114	10
Support public facilities for revitalization	Create suitable living environments	Public facility	Persons assisted	2,827	525	330	840	\$ 324,000	2,827
Increase supply of affordable owner-occupied housing	Provide decent affordable housing	Direct financial assistance to homebuyers	Households	6	-	-	6	\$ 147,886	2
Supportive efforts to reduce poverty	Create suitable living environments	Public service	Persons assisted	9,000	6,000	2,500	500	\$ 44,550	3,000
Supportive services for people who are homeless	Create suitable living environments	Public service	Persons assisted	420	420	-	-	\$ 90,450	140
Administration and planning	Administration	NA	NA	-	-	-	-	\$ 152,000	-
			Totals		6,955	2,850	1,346		5,984
				12,283	56.62%	23.20%	10.96%	\$ 900,000	48.72%
			Percent of total goal						

Consolidated Plan Goals 2015-17

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The 2014 and 2015 Consolidated Annual Performance Evaluation Report identified the goals and accomplishments for the previous years against the outcomes expected in the Consolidated Plan. In reviewing activities accomplished with its federal funding the last fiscal year, the City of Mount Vernon advanced its goals of increasing the capacity of housing and human service organizations to serve the homeless and to provide effective support services to priority low-income and homeless populations by conducting a balance of projects. The projects were selected based on consultation with local agencies and in response to the area's countywide Continuum of Care Plan. Along these lines, funds were allocated to public services provided to city residents by Community Action of Skagit County, specifically, CASC's critical needs program and its William J. Shuler Family Development Center.

In addition, the City chose to focus attention and resources on the revitalization of one of its highest concentration low-income neighborhoods – the downtown area (Census Tract 9525, especially block group 3). Funds were allocated to implementing a flood hazard mitigation project to protect the neighborhood from catastrophic flooding from the adjacent Skagit River.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

To prepare the Consolidated Plan, the City consults with appropriate public and private agencies and conducts a public hearing to obtain citizen input. This assures that the document is comprehensive. This draft Action Plan is made available for review and comment by the public between February 24, 2016 and May 13, 2016. A summary of citizen comments is in the General section of this document under Citizen Participation.

The City consulted with key stakeholder groups and organizations in the process of developing this Consolidated Plan. The City consulted with the following community groups during preparation of the plan:

- Community Action of Skagit County
- Skagit County Public Health
- Housing Authority of Skagit County
- Latino Advisory Committee
- Skagit County Coalition to End Homelessness
- City of Mount Vernon elected officials and staff

PUBLIC HEARING PROCESS: The public hearing on the Consolidated Plan was held on February 24, following a public notice that was published in English and Spanish. The purpose of the hearing was to obtain the views of citizens and other interested parties on the housing and nonhousing community development needs of the City before the 2016 Annual Action Plan was prepared. On May 11th, the City Council held a public meeting discussion on the draft plan prior to taking Council action to approve the plan.

Skagit County has also made the Consolidated Plan and Annual Action Plan available for review and comment by the public during the first half of 2016, and the Skagit County Commissioners held a public hearing on April 5th and May 3rd.

5. Summary of public comments

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

February 24th, 2016 Public Hearing comments included:

- Kent Haberly from Home Trust of Skagit indicated that the homeownership assistance organization supports the proposed action plan.
- Lynn Christofersen, Community Services Director at Community Action of Skagit County came to speak in support of the action plan.

Also, the City received two letters of interest suggesting projects to be funded by CDBG:

- Steve Powers, Division Director of Catholic Housing Services, requested \$68,400 for rehabilitation of two low-income rental housing developments located in the City.
- Jodi Monroe, Executive Director of Home Trust of Skagit, requested \$50,000 for homeownership assistance for LMI homebuyers buying a home in Mount Vernon.

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

All comments and views were accepted for consideration. After consideration of priorities, the City has prioritized CDBG investment in the goal of increasing the supply of rental housing, while carrying forward with the current allocations for the goals of maintaining affordable housing stock and increasing the supply of affordable owner-occupied housing.

7. Summary

The City of Mount Vernon's Strategic Plan outlines the housing and community development goals and strategies to meet the priority needs with available resources. This Strategic Plan covers the period from July 1, 2015 through June 30, 2017.

PRIORITIES: The level of need in a community is always greater than the limited resources available to help meet those needs. The City uses these priorities and goals to form the basis for determining what types of housing and community development programs the City will fund over the next three years. The City has identified the following general priorities (not in order) for the use of CDBG funding.

Priority 1. Homelessness: The Washington State Legislature required all Counties to develop a ten-year plan to reduce homelessness by 50% by the year 2015. Skagit County's plan was last updated in 2012. The City adopts, by reference, Skagit County's Homeless Plan, including its goals and strategies.

Priority 2. Increase affordable housing supply: The cost of rental and homeowner housing is beyond the reach of many Mount Vernon households who are homeless or who are struggling with a severe housing cost burden, putting their future tenancy at risk. The City of Mount Vernon participated in 2013 in the Skagit County Affordable Housing Advisory Committee process that generated a set of strategies to increase the supply of affordable housing. The City's CDBG program is part of that larger strategy as it relates to housing within the City of Mount Vernon.

Priority 3. Public facilities to support revitalization: The opportunities for Downtown Mount Vernon revitalization are many, and they promise to increase safety and create economic development opportunities that will increase employment and housing for LMI area residents. Some of the revitalization activities will require upgrades to, or new infrastructure (e.g. pedestrian mobility improvements, utilities, flood hazard mitigation facilities, etc.).

Priority 4. Preservation: Preservation strategies are needed to maintain the stock of existing affordable housing resources.

Priority 5. Assist special needs populations: Public services are needed to help individuals and families with special needs obtain help with basic needs, food, housing, employment, health, and other important services.

Priority 6. Administration and planning: Implementation of this consolidated plan requires certain administrative and planning activities including the development of the plan, environmental review of projects, subrecipient monitoring, development of fair housing information, and other activities required by law.

GOALS: Based on the needs, housing market analysis and priorities, the Strategic Plan proposes the following goals over the next three years:

- Increase supply of affordable rental housing

- Maintain affordable housing stock
- Support public facilities for revitalization
- Increase supply of affordable owner-occupied housing
- Supportive efforts to reduce poverty
- Supportive services for people who are homeless
- Administration and planning

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	MOUNT VERNON	
CDBG Administrator	MOUNT VERNON	Project Development Manager
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

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

1. Introduction

As part of its Consolidated Plan development, the City undertook an extensive outreach program to consult and coordinate nonprofit agencies, affordable housing providers, and government agencies. The outreach program has been summarized in the Executive Summary and Citizen Participation sections of the Consolidated Plan and the Annual Action Plan.

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

The public and low-income housing providers, as well as the governmental planning, health, mental health and service agencies, have close working relationships in Mount Vernon and Skagit County. Skagit County Public Health Department is the lead agency for homeless housing and behavioral health activities in our community. The City consults regularly with the local Continuum of Care (Skagit County Coalition to End Homelessness). The City also consults regularly with the Housing Authority of Skagit County.

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

The City has incorporated into the Strategic Plan, the local Continuum of Care plan to end homelessness, which will be the blueprint for prioritizing the use of CDBG funds toward the goals of ending homelessness in the City

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

The City has coordinated with Skagit County Public Housing, the Skagit County Coalition to End Homelessness, and Community Action of Skagit County, the organizations most responsible for using ESG funds and for administering HMIS for service providers who operate in the City. The City has incorporated their goals, strategies, activities and outcomes in the Consolidated Plan.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community Action of Skagit County
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meetings with senior staff and multi-agency meetings. Participated in various committees in which they provided input to the groups. Anticipate continued coordination of public services activities and increased coordination of homeless activities.
2	Agency/Group/Organization	SKAGIT COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meetings with senior staff and multi-agency meetings. Anticipate increased coordination of homeless activities.
3	Agency/Group/Organization	Skagit Habitat for Humanity
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meetings with senior staff and board members, and multi-agency meetings. Anticipate continued coordination of homeownership activities.
4	Agency/Group/Organization	Housing Authority of Skagit County
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy Need to increase affordable housing stock; need to increase farm worker housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	One-on-one meetings with senior staff. HA staff have met 1-on-1, attended High Needs Housing Committee, providing input to the group as a whole about HOME, and met with local agencies of opportunities to discuss possible opportunities to connect housing projects to HOME, emphasized the need to increase affordable housing stock.
6	Agency/Group/Organization	Home Trust of Skagit
	Agency/Group/Organization Type	Housing

What section of the Plan was addressed by Consultation?	
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in HOME Consortium Advisory Committee. One-on-one meetings with senior staff and board members, and multi-agency meetings.

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

There is no Community-Based Development Organization (CBDO) or Neighborhood Revitalization Strategy Agency (NRSA) currently.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Community Action of Skagit County	The Strategic Plan (in section SP-60) has adopted the major strategies of the 10-year Plan
Downtown and Waterfront Master Plan Project	City of Mount Vernon	The Strategic Plan identifies Downtown Mount Vernon as a target area for revitalization, and incorporates the major goals of public facilities (infrastructure) improvements.
Skagit County Housing Affordability Strategy	Skagit County Public Health Department	Building a better, coordinated strategy for LMI-affordable homes and related issues
Redevelopment Tools for Downtown Mount Vernon	HUD OneCPD, Enterprise Community Partners	This report summarizes a technical assistance team's findings and suggests an array of strategies and tools that will help the City achieve its Downtown redevelopment goals.
Skagit Valley Farmworker Housing Trust 2010-15	Skagit Valley Farmworker Housing Trust Advisory Council	This plan describes the needs for farmworker housing in the region and the current conditions of substandard and overcrowded housing.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Growth Management Act Comprehensive Plans	Skagit County Council of Governments	GMA quote: "availability of housing affordable to all economic segments..."

Table 3 - Other local / regional / federal planning efforts

Narrative

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

Citizen participation efforts included direct outreach to organizations and stakeholder groups, public notices, including notices published in Spanish to accommodate the high percentage of Mount Vernon residents who do not speak English very well or at all. The impact on goal setting was particularly strong for the planned strategies and priorities for homeless strategies, affordable housing, and Downtown Mount Vernon redevelopment efforts.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Newspaper Ad	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	No responses directly to the ad, which was a public notice for the public hearing	See comments of Feb 24th public hearing		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Two commenters attended	See Executive Summary #5		
3	Skagit County Coalition to End Homelessness	Continuum of Care members	Very good attendance by Coalition members who make up the Continuum of Care for the area that includes City of Mount Vernon	Higher priority requested for supportive housing and wrap-around services for people who are chronically homeless		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Outreach to Individuals	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Most people quite interested in sharing their perspective on priorities	Wide variety of perspectives, general agreement about housing as a top priority along with public services using CDBG		

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.420(b), 91.220(c) (1, 2)

Introduction

The City anticipates annual CDBG grant funds of approximately \$300,000 per year. Approximately \$100,000 of each year’s CDBG grant will be used to repay the Section 108 loan. In the event that appropriations are greater or less than anticipated, the following activities are proposed as contingencies: Public Facilities and Housing. The City will publish notices and solicit comments for substantial amendments that equal 10% or more of the annual CDBG grant amount.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	303,142	0	0	303,142	300,000	Funds used for acquisition, admin/planning, economic dev., housing, public facilities, public services

Table 5 - Expected Resources – Priority Table

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

Federal funds the City receives through the Community Development Block Grant (CDBG) are used to leverage other federal, state, local and private resources to meet housing and community development needs. While matching funds are not currently required for the City's CDBG program, the City anticipates that most major projects will be funded primarily through non-CDBG resources. For example, new multi-family housing will be funded primarily through low-income housing tax credit program and the WA State Housing Trust Fund, with relatively small local investment of CDBG dollars. The City owns land that will be used to complete the flood hazard control project in the Downtown neighborhood.

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

The City owns land that will be used to complete the flood hazard control project in the Downtown neighborhood.

Discussion

The City of Mount Vernon and other local Skagit County jurisdictions and stakeholder organizations participated in the development of a county-wide housing affordability strategy that anticipates using local resources – including CDBG – to leverage significant additional local and nonlocal resources to meet the affordable housing needs of county residents, including those who live in Mount Vernon. That strategy also anticipated the creation of a multi-county HOME Investment Partnerships Consortium of which Mount Vernon is a participating jurisdiction.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Support public facilities for revitalization	2015	2017	Non-Housing Community Development	DOWNTOWN MOUNT VERNON	Public facilities to support revitalization	CDBG: \$108,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2827 Persons Assisted
2	Supportive services for people who are homeless	2015	2017	Homeless	City of Mount Vernon	Homelessness	CDBG: \$30,471	Public service activities other than Low/Moderate Income Housing Benefit: 140 Persons Assisted
3	Supportive efforts to reduce poverty	2015	2017	Non-Homeless Special Needs	City of Mount Vernon	Assist special needs populations	CDBG: \$15,000	Public service activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
5	Maintain affordable housing stock	2015	2016	Affordable Housing	DOWNTOWN MOUNT VERNON City of Mount Vernon Census Tract 9523 Census Tract 9522	Increase affordable housing supply	CDBG: \$68,400	Rental units rehabilitated: 72 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Administration and planning	2015	2017	Administration and Planning	City of Mount Vernon	Administration and planning	CDBG: \$31,271	Other: 0 Other
7	Increase supply of affordable rental housing	2017	2017	Affordable Housing	City of Mount Vernon	Increase affordable housing supply	CDBG: \$50,000	Rental units constructed: 5 Household Housing Unit

Table 6 - Goals Summary

Goal Descriptions

1	Goal Name	Support public facilities for revitalization
	Goal Description	Pay the annual payments on the City's Section 108 Loan used to finish the flood hazard mitigation project as a necessary component of the Downtown revitalization strategy.
2	Goal Name	Supportive services for people who are homeless
	Goal Description	Operations support for the William J Shuler Family Development Center homeless shelter.
3	Goal Name	Supportive efforts to reduce poverty
	Goal Description	Provide basic needs support for low-income Mount Vernon residents through Community Action of Skagit County's Basic Needs Program.
5	Goal Name	Maintain affordable housing stock
	Goal Description	Rehabilitation of low-income rental housing and special needs housing.

6	Goal Name	Administration and planning
	Goal Description	Planning and administration to implement the Consolidated Plan and comply with applicable regulations.
7	Goal Name	Increase supply of affordable rental housing
	Goal Description	Land acquisition and/or project predevelopment expenses related to a supportive housing project

Table 7 – Goal Descriptions

AP-35 Projects - 91.420, 91.220(d)

Introduction

- Public services - 15% of CDBG grant
- Public facilities - 36%
- Housing rehabilitation - 23%
- Housing production - 16%
- Administration - 10%

#	Project Name
1	Phase 2 Floodwall
2	Family Development Center
3	CASC Basic Needs
4	CHS Housing Rehabilitation
5	Supportive Housing Production
6	Planning and Administration

Table 8 – Project Information

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

Allocation priorities are based on the needs and market analysis identified in the Consolidated Plan, along with requests from housing and nonprofit agencies for funding assistance.

The 2016 Action Plan includes funding to address public facility improvements in Downtown Mount Vernon as part of the City's Downtown revitalization strategy. Approximately 36% of the 2016 CDBG allocation will be used to make one annual payment (including interest) on the City's Section 108 Loan (the total loan amount is \$1,000,000) that was used to fund work on the flood wall that will protect Downtown Mount Vernon residents and businesses, and create a suitable environment for substantial private investment.

The public (human) service funding was based on priorities set forth in previous years. The City's allowable allocation is, by law, only 15% of the grant funds, amounting to only \$45,471, which is divided between funding for Community Action's Basic Needs Program for low-income Mount Vernon residents, and the operations of the William J Shuler Family Development homeless shelter.

The City recognizes that homelessness has increased, as documented in the Point-In-Time Count, and that additional measures that increase the supply of supportive housing with wrap-around services for the chronically homeless, In the 2016 Annual Action Plan the City proposes the use of CDBG for land acquisition for a supportive housing and for predevelopment expenses related to the development of supportive housing.

Home Trust of Skagit has access to CDBG funds to continue its homeownership assistance program that helps low-income homebuyers purchase modestly priced homes that will remain affordable in perpetuity due to Home Trust's community land trust strategy of shared equity homeownership. Home Trust has unexpended funds from prior Annual Action Plans that will remain available as agreed. Increasing the supply of affordable owner-occupied housing will remain in the Annual Action Plan as a contingency.

The City has invested CDBG funding to maintain affordable rental housing projects during prior Annual Action Plans. This goal and need continues to compete as a priority for CDBG use, although the 2016 Annual Action Plan prioritizes increasing the supply of affordable rental housing. Maintaining affordable rental housing stock will remain in the Annual Action Plan as a project.

The City will address any obstacles to underserved needs as follows:

- The City will work with other funding agencies, including Skagit County, United Way, and private foundations, to coordinate funding to more effectively meet the needs of the community.
- The City will seek opportunities to increase funding available for affordable housing.
- The City will work to inform lenders and households regarding Fair Housing laws, and in

particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership. The City will also develop and implement an action strategy that addresses the issues in its Analysis of Impediments to Fair Housing Choice.

AP-38 Project Summary

Project Summary Information

1	Project Name	Phase 2 Floodwall
	Target Area	City of Mount Vernon
	Goals Supported	Support public facilities for revitalization
	Needs Addressed	Public facilities to support revitalization
	Funding	CDBG: \$108,000
	Description	Pay the annual payments (loan payment plus interest) on the City's Section 108 Loan used to finish the flood hazard mitigation project as a necessary component of the Downtown revitalization strategy.
	Target Date	12/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	Family Development Center
	Target Area	City of Mount Vernon
	Goals Supported	Supportive services for people who are homeless
	Needs Addressed	Homelessness
	Funding	CDBG: \$30,471

	Description	Operations support for the William J Schuler Family Development Center homeless shelter.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Support the staffing that provide case management services to homeless families staying at the shelter.
3	Project Name	CASC Basic Needs
	Target Area	City of Mount Vernon
	Goals Supported	Supportive efforts to reduce poverty
	Needs Addressed	Assist special needs populations
	Funding	CDBG: \$15,000
	Description	Provide basic needs support for low-income Mount Vernon residents through Community Action of Skagit County's Basic Needs Program.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Community Action Basic Needs program for low-income Mount Vernon residents.
4	Project Name	CHS Housing Rehabilitation
	Target Area	City of Mount Vernon

	Goals Supported	Maintain affordable housing stock
	Needs Addressed	Increase affordable housing supply
	Funding	CDBG: \$68,400
	Description	Rehabilitation of low-income rental housing and special needs housing.
	Target Date	12/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	150 people, over half of which are school age children.
	Location Description	Villa Santa Maria Apartments, 3700 E. College Way, Mount Vernon Villa San Isidro Apartments, 1917 N. LaVenture Road, Mount Vernon
	Planned Activities	Villa Santa Maria: Replacement of bathroom and whole house fans, water heaters, and failing outdoor light fixtures. Install new LED fixtures for parking lot lighting and unit porch lights. Villa San Isidro: Replace exterior parking lot and porch lighting with modern LED fixtures.
5	Project Name	Supportive Housing Production
	Target Area	City of Mount Vernon
	Goals Supported	Increase supply of affordable rental housing
	Needs Addressed	Increase affordable housing supply
	Funding	CDBG: \$50,000
	Description	Land acquisition and/or project predevelopment expenses related to a supportive housing project.
	Target Date	12/31/2018

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	Planning and Administration
	Target Area	City of Mount Vernon
	Goals Supported	Administration and planning
	Needs Addressed	Administration and planning
	Funding	CDBG: \$31,271
	Description	Planning and administration to implement the Consolidated Plan and comply with applicable regulations.
	Target Date	6/30/2017
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Grantee planning and administrative tasks.

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Approximately 36% of 2015 CDBG funds will be directed to public facility improvements in Downtown Mount Vernon. The remaining funds will not be directed to any target area.

Geographic Distribution

Target Area	Percentage of Funds
DOWNTOWN MOUNT VERNON	36
City of Mount Vernon	64
Census Tract 9523	0
Census Tract 9522	

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The projects that have been targeted into neighborhoods reflect the priority to encourage activities to locate where they are most effective and efficient.

Discussion

Downtown Mount Vernon is the only single neighborhood target area. Census Tract 9522 has a high proportion of LMI residents. There are a wide variety of other needs and priorities throughout the City.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

Because the City of Mount Vernon's annual CDBG grant is relatively small, it is difficult to use CDBG for many other purposes than those already identified. However, the City does intend to invest other resources and effort toward the following actions:

Actions planned to address obstacles to meeting underserved needs

The City will conduct outreach to various community sectors to inform lenders, property managers, and the public about Fair Housing laws; the City recently updated its Analysis of Impediments to Fair Housing Choice, and will be developing an action plan for fair housing activities based on that analysis.

Actions planned to foster and maintain affordable housing

The City will work in partnership with the Housing Authority of Skagit County to secure the resources necessary to rehabilitate the President Apartments, an important low-income housing resource in Downtown Mount Vernon. Rehabilitation of this historic landmark is a priority action for the revitalization of the Downtown neighborhood.

Actions planned to reduce lead-based paint hazards

All housing rehabilitation efforts on homes that were built before 1978 will include lead-based paint hazard evaluations. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.

Actions planned to reduce the number of poverty-level families

Poverty is a function of income, which is related to education, job training and employment. Annually the City provides CDBG funds to public service agencies to assist households below the poverty level with services. Major economic development programs in support of business development and job creation are being undertaken, including efforts to revitalize the Downtown neighborhood. The City continues to have three major priorities for expanding the range of economic development opportunities available to low- and moderate-income residents:

- Develop new businesses and create new jobs in the target areas,
- Improve access to employment opportunities within the target areas, and
- Help residents acquire the skills required for success in today's job market.

Actions planned to develop institutional structure

The City will work in partnership with adjacent and regional jurisdictions to implement a new, regional HOME Consortium. A new, regional HOME Consortium will enhance the resource base for developing more affordable housing, and for addressing institutional barriers to creating more affordable housing.

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

The City will support the efforts of the Coalition to End Homelessness and participate more regularly in their multi-agency meetings. More active participation in the Coalition will improve the coordination of the City's Consolidated Plan goals and the Coalition's 10-Year Plan to End Homelessness.

Discussion

The resulting recommendations of two new planning efforts that took place in 2013 present the City with new ideas and opportunities for reducing barriers to affordable housing and revitalizing Downtown Mount Vernon. The 2013 Skagit County Affordable Housing Advisory Committee Strategy, and City by the River: Redevelopment Tools for Downtown Mount Vernon shall act as guides to maximize the impact of the City's CDBG investments and to gain access to new tools and resources that will advance the goals and priorities of this Consolidated Plan.

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

Introduction

The 2016 Action Plan continues the City's CDBG goals and projects that the City has implemented in the past, including homebuyer assistance, public (human) services, and flood hazard mitigation in Downtown Mount Vernon.

Additionally, the 2016 Action Plan include funding for one agency to conduct rehabilitation activities to maintain two low-income rental facilities containing 72 apartments and for the City to support the development of permanent supportive housing.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

Discussion

Attachments

Citizen Participation Comments

Mount Vernon City Council Regular Meeting Minutes February 24, 2016

The meeting was called to order by Mayor Pro-Tem Lindquist at 7:00 p.m.

Present: Councilmembers Fiedler, Hudson, Lindquist, Molenaar, Ragan

Absent: Mayor Boudreau, Councilmember Hulst and Quam (excused)

Staff Present: Public Works Director Bell, Police Chief Dodd, Community Development Director Hyde, Finance Director Huschka, Assistant Public Works Director Love, Equipment Rental Manager Owens, Special Project Manager Stendal, City Attorney Rogerson

Citizens Present: 7

Approval of Minutes

- A. Approval of February 3, 2016 Study Session Minutes.

Councilmember Fiedler moved to approve the February 3, 2016 Study Session meeting minutes. Motion seconded by Councilmember Ragan. Motion carried 5-0.

- B. Approval of February 10, 2016 Regular Council Meeting Minutes.

Councilmember Molenaar moved to approve the February 10, 2016 Regular Council Meeting minutes. Motion seconded by Councilmember Ragan. Motion carried 5-0.

Approval of Claims and Payroll

- A. Approval of February 24, 2016 claims numbered 143691, 143693 - 143860 in the amount of \$2,556,425.62.

Councilmember Fiedler moved to approve the February 24, 2016 claims numbered 143691, 143693 - 143860. Motion seconded by Councilmember Hudson. Motion carried 5-0.

- B. Approval of February 15, 2016 payroll checks numbered 105167 - 105213, direct deposit checks numbered 54599 - 54800, and wire transfers numbered 555 & 556 in the amount of \$741,934.28.

Councilmember Ragan moved to approve the February 15, 2016 payroll checks numbered February 15, 2016 payroll checks numbered 105167 - 105213, direct deposit checks numbered 54599 - 54800, and wire transfers numbered 555 & 556 in the amount of \$741,934.28. Motion seconded by Councilmember Molenaar. Motion carried 5-0.

REPORTS

- A. Committee Reports:

- Finance – for details see Committee minutes.

- B. Community Comments:

- Joan Penny came forward to ask Council to meet with the Housing Affordability and Availability Task Force (HAATF) during a study session to discuss affordable housing options in the City and how those needs can be incorporated into the Comprehensive Plan that is now under way.

- Adolfo Caltero said he was the 25th Street Block Watch Captain and came to ask for assistance in expediting safety changes to his neighborhood. Better night time illumination and no parking signs on a sharp curve would help to increase safety and decrease potential problems in this area.
- C. Committee Agenda Requests:
- Councilmember Fiedler request the HAATF group be placed on a Study Session agenda as part of the comprehensive plan process.

NEW BUSINESS

- A. Open Record Public Hearing – CDBG 2016 Action Plan: This is an open record public hearing to obtain the views of citizens and other interested parties on the housing and non-housing community development needs of the City before a draft Community Development Block Grant (CDBG) 2016 Action Plan is prepared.

Mayor Pro Tem Lindquist opened the public hearing.

- Kent Haberly from Home Trust of Skagit indicated that they support the action plan.
- Lynn Christofersen, Community Services Director at Community Action Agency came to speak in support of the action plan.

There being no further comment Mayor Pro Tem Lindquist closed the CDBG public hearing.

- B. Interlocal Agreement – National Joint Powers Alliance (NJPA): Mr. Owens presented Council with a request to authorize the Mayor to enter into an interlocal agreement with NJPA for purchase of goods and equipment (video van).

Councilmember Ragan moved to authorize the Mayor to enter into an agreement with National Joint Powers Alliance. Motion seconded by Councilmember Fiedler. Motion carried 5-0.

- C. Out of State Travel Request – Police Department: Chief Dodd presented Council with a request to authorize a Police Officer to attend the International Conference on Sexual Assault and Domestic Violence in Washington DC. The travel and training are fully funded by the Services-Training-Officers-Prosecutors (STOP) Violence Against Women Grant and conference scholarship.

Councilmember Ragan moved to approve the out of state travel request as outlined. Motion seconded by Councilmember Fiedler. Motion carried 5-0.

- D. Approval of Lease Agreement for Cell Tower Installation at Fire Station #3: Mr. Hyde presented a request for Council to authorize the Mayor to enter into an agreement with Atlas Cell Tower Company to lease ground at Fire Station #3 for installation of a 125 foot tall stealth cell tower pole.

Councilmember Fiedler moved to authorize the Mayor to enter into an agreement with Atlas Cell Tower Company for a ground lease at Fire Station #3. Motion seconded by Councilmember Hudson. Motion carried 5-0.

- E. Safe Routes to School 2013 - Professional Services Agreement Change Order No.1: Mr. Love presented a request for Council to authorize the Mayor to execute a change order to the professional services agreement with Reichhardt and Ebe Engineering, Inc. for preparation of

plans, specifications, estimates and construction of signal improvements at LaVenture and Section Streets in an amount not to exceed \$63,600.

Councilmember Ragan moved to authorize the Mayor to execute a change order to an agreement with Reichhardt and Ebe Engineering, Inc. for professional services. Motion seconded by Councilmember Molenaar. Motion carried 5-0.

- F. Downtown Flood Protection Project Phase 3 Design Change Order: Mr. Love presented a request for Council to authorize the Mayor to execute a change order to the professional services agreement with Reichhardt and Ebe Engineering, Inc. for preparation of plans, specifications and estimates for the Downtown Flood Protection Project Phase 3 Design in an amount not to exceed \$263,200.

Councilmember Fiedler moved to authorize the Mayor to execute a change order on an agreement with Reichhardt and Ebe Engineering, Inc. for professional services. Motion seconded by Councilmember Hudson. Motion carried 5-0.

There being no further business the meeting was adjourned at 7:51 p.m.

SUBMITTED BY:

Rebecca J. Wade, Recording Secretary

ATTEST:

Alicia D. Huschka, Finance Director

APPROVE:

Jill Boudreau, Mayor

Grantee SF-424's and Certification(s)

OMB Number: 4340-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Mount Vernon"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="91-8001260"/>	* c. Organizational DUNS: <input type="text" value="33-7952724"/>	
d. Address:		
* Street1: <input type="text" value="910 Cleveland Avenue"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Mount Vernon"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="WA: Washington"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="98273"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Mayor's Office"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Peter"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Cobovab"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Project Development Manager"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="360 336 6211"/>	* Fax Number: <input type="text" value="360 336 0623"/>	
* Email: <input type="text" value="petard@mountvernonwa.gov"/>		

Application for Federal Assistance SF-424			
* 9. Type of Applicant 1: Select Applicant Type:			
<input type="text" value="C: City or Township Government"/>			
Type of Applicant 2: Select Applicant Type:			
<input type="text"/>			
Type of Applicant 3: Select Applicant Type:			
<input type="text"/>			
* Other (specify):			
<input type="text"/>			
* 10. Name of Federal Agency:			
<input type="text" value="E00"/>			
11. Catalog of Federal Domestic Assistance Number:			
<input type="text" value="14-218"/>			
CFDA Title:			
<input type="text" value="Community Development Block Grant Program"/>			
* 12. Funding Opportunity Number:			
<input type="text"/>			
* Title:			
<input type="text"/>			
13. Competition Identification Number:			
<input type="text"/>			
Title:			
<input type="text"/>			
14. Areas Affected by Project (Cities, Counties, States, etc.):			
<input type="text"/>	<input type="button" value="Add Attachment"/>	<input type="button" value="Delete Attachment"/>	<input type="button" value="View Attachment"/>
* 16. Descriptive Title of Applicant's Project:			
<input type="text" value="Community Development Block Grant 2016 Action Plan"/>			
Attach supporting documents as specified in agency instructions.			
<input type="button" value="Add Attachments"/>	<input type="button" value="Delete Attachments"/>	<input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

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

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

17. Proposed Project:

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

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="303,142.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="303,142.00"/>

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

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

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

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

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

Yes No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

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

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

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.

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-111, "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

5/11/16

Date

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 years, 2016-2017 (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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;

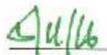
Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

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;

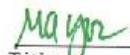
Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official



Date



Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING:

A. Lobbying Certification

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