

## **Executive Summary**

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

#### **1. Introduction**

The FY 2019 Consolidated Plans for the Tacoma-Lakewood Consortium provide a framework for addressing housing and community development needs in these cities. The Plans are developed for the U.S. Department of Housing and Urban Development to define how funding is to be allocated for the following federal programs: the Community Development Block Grant Program (CDBG), HOME Investment Partnership Act (HOME), and for the City of Tacoma, Emergency Shelter Grants (ESG).

The FY 2019 Annual Action Plan (July 1, 2019 – June 30, 2020), Lakewood's fifth, and final, under the 5-YR Consolidated Plan (2015-2019), is a one-year plan that addresses local community and economic development needs and the resources necessary to meet the needs of low and moderate income households. The Plan identifies unique needs and assets in Lakewood and Tacoma, as well as on a regional basis. Goals and priorities of the Annual Action Plan are to be consistent with national objectives and priorities established by HUD and shall be consistent with the goals and strategies identified in the 5-YR Consolidated Plan.

Strategies identified in this Plan were built upon a broad citizen participation process in consultation with public and private agencies. Through this planning process, the FY 2019 policies and priorities were developed to improve economic opportunity and investment through improvements to infrastructure and public facilities, revitalize neighborhoods through removal of blight and targeted investment, eliminate threats to public health and safety, and to preserve and/or expand affordable housing choice for low and moderate income individuals. Subsequently, the Lakewood City Council adopted policies and priorities on the use of FY 2019 CDBG and HOME funds.

In FY 2019, CDBG funds will complete the 5-year funding cycle with a focus on physical/infrastructure improvements, housing, and public services. No funding will be allocated to economic development activities in 2019.

#### **First Amendment- FY 2019 AAP:**

This Amendment includes \$350,611 in CDBG-CV funding as authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 to be used to prevent, prepare for, and respond to the coronavirus outbreak. Funding in the amount of \$350,611 is being allocated in support of a Small Business Emergency Services Program which will provide much needed capital to small

businesses (10 employees or fewer) impacted by the ongoing coronavirus shutdown in effort to sustain these business from shuttering their doors and laying off employees.

Second Amendment- FY 2019 AAP:

Allocates \$456,726 in CDBG-CV3 funds and \$246,700.59 in unexpended CDBG-CV1 funds for emergency payments for rental and mortgage assistance to low income individuals affected by the coronavirus pandemic. No other changes are proposed.

## **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 2019 Annual Action Plan will complete the City's five year funding focus on the following priority needs identified in the 5-YR Consolidated Plan: 1) Need for affordable housing; 2) Need for basic services and for homeless prevention and intervention; and 3) Need for community and economic development. For 2019, funding will focus on community and economic development with funding allocated for infrastructure improvements in census tract 072016, and in support of job training programs for low income individuals facing multiple barriers to employment such as lack of childcare, transportation, and housing. Funding in support of affordable housing choice will concentrate on homeowner rehabilitation/repair programs, down payment assistance, and the development of new housing for low income households.

Recommended funding allocations for FY 2019, including the reprogramming of unexpended FY 2016 and 2017 funding, include:

- *Physical/Infrastructure Improvements* – A total of \$164,257.17 is recommended for neighborhood-related infrastructure improvements.
- *Housing Improvements* – Funding in the amount of \$159,884.09 and \$41,324.09 (2016 Low Income Street Lighting - \$21,062.43; 2017 Administration - \$18,572.92; and 2017 Section 108 Repayment \$1,688.74) in reprogrammed CDBG funding are recommended in support of the Major Home Repair/Sewer Loan Program; and \$30,357.94 in support of CDBG Administration of HOME housing activities. A total of \$140,000 in program income is recommended for continued support of Major Home Repair program (CDBG - \$65,000) and Neighborhood Stabilization Program activities (NSP1 - \$75,000).

In addition to the \$231,566.12 in CDBG funding for housing-related activities, a total of \$273,330 in HOME funding is recommended in support of housing activities (HOME Affordable Housing Fund - \$225,000; and HOME Housing Rehabilitation - \$48,330). HOME funding allocations for Lakewood may be found in Tacoma's 2019 Joint Consolidated Annual Action Plan.

• *Public Services* – ~~\$45,000 is recommended in support of job training /apprenticeship programs for low income individuals. Funding in support of public and human services programs is also being provided as part of the City's 1% General Fund allocation.~~ \$456,726 in CDBG-CV3 and \$246,700.59 in CDBG-CV1 funds are to be allocated in support of emergency payments for rental and mortgage assistance to low income individuals affected by the coronavirus pandemic.

• *Economic Development* – ~~No funding recommended.~~ A total of \$103,910.41 ~~\$350,611~~ in CDBG-CV1 funding is being added in support of an emergency business assistance program to respond to the growing effects of the coronavirus health crisis with a focus on job retention/creation activities for low income individuals.

• *Administrative Activities* – Funding in support of general administrative activities for CDBG are recommended at \$112,624.80.

• *Section 108* – A total of \$51,000 in 2019 CDBG funding is recommended in support of debt service payments for the City's recently completed 108th Street Roadway Improvement project (\$47,000 principal; and \$4,000 interest).

### **3. Evaluation of past performance**

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

The 5-YR Consolidated Plan (2015-2019) for Lakewood and Tacoma identified three primary goals: 1) Increase and preserve affordable housing choice; 2) Reduce homelessness and increase stability; and 3) Improve infrastructure, facilities and economic development. As the Consolidated Plan moves into its fifth and final year, a look back to previous funding cycles reveals a concerted effort to further community and economic development gains through investment in infrastructure improvements and continued investment in housing preservation. Over the previous four years, the City has struck a course balancing the need for affordable housing opportunity, the creation of suitable living environments, and the expansion of economic opportunity through strategic investment in community facilities and improvements to infrastructure in many low income neighborhoods.

Lakewood, not unlike other communities, continues to find itself with an ongoing need to maintain and update infrastructure necessary to fuel and maintain a healthy, vibrant community. It is this investment in roads, sidewalks, facilities and services that drives society forward, fosters economic investment, and forms the very foundation of community through connectivity and access for all. Evidence of this type of investment over the most recent five years can be seen in Lakewood's funding of roadway and accessibility improvements along 108th St. SW, multiple low income street lighting projects, and roadway and storm water improvements to 123rd St. SW.

Other areas of concern for low and moderate income populations continues to be housing choice and access to decent affordable housing, especially those in metropolitan areas. As many west-coast cities witness year after year of double digit median home price increases, housing stability and affordability are quickly becoming an everyday concern for many low and moderate income families. With income growth lagging behind, sustainable long-term housing strategies are likely the next big hurdle for many communities to overcome. This is especially true in Pierce County where the median home price has continued to grow at a nearly 10 percent clip while at the same time annual wages have seen growth of less than 4 percent.

The City of Lakewood fully expects to meet the benchmarks established in the 5-YR Consolidated Plan. A complete evaluation of the performance measures, including program spending accomplishments, will be provided as part of the Consolidated Annual Performance Evaluation Report (CAPER) for FY 2019.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The FY 2019 Annual Action Plan was developed in coordination with the City of Tacoma and local organizations, agencies, and stakeholders. The Plan was developed in accordance with requirements established by the U.S. Department of Housing and Urban Development and the Citizen Participation Plan as adopted by the City of Lakewood. Citizen activities included notification in the Tacoma News Tribune on September 19, 2018 of an October 4, 2018 public hearing held by the Lakewood Community Services Advisory Board (CSAB) on the acceptance of proposals for FY 2019 (July 1, 2019 – June 30, 2020) Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) programs. Citizen input was solicited to identify community and economic development, housing, and public service's needs.

Notification of the Draft FY 2019 Annual Action Plan was published on March 29, 2019 in the Tacoma News Tribune indicating where the document were available for review during the 30-day citizen comment period (April 1, 2019 – April 30, 2019). A public hearing by the Lakewood City Council were held on April 15, 2019 to solicit comments from citizens, local for-profit and non-profit agencies, neighborhood associations, the State of Washington, Pierce County, City of Tacoma, local public housing authorities, 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 CSAB and Lakewood City Council are summarized later in this report.

In accordance with the City's Citizen Participation Plan, projects that are substantially changed are submitted to the Community Services Advisory Board for comment, a 30-day citizen comment period is observed, and are then forwarded on for implementation by Council.

In an effort to expedite funding process and delivery of assistance to those affected by the COVID-19 outbreak, HUD issued the following memorandum titled, Availability of Waivers of Community Planning and Development (CPD) Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19. The purpose of the memorandum was to provide a simplified notification process including waivers of specific regulatory processes associated with various CPD-administered grant programs. Included was a waiver of the 30-day public hearing comment period in favor of a 5-day comment period, and waiver of reasonable notice and opportunity to comment due to the limitation on public gatherings in favor of allowing grantees to determine what constitutes reasonable notice and opportunity to comment given the current circumstances in dealing with the effects of the coronavirus.

On April 24, 2020, the City provided HUD with the appropriate notice thereby reducing the City's public comment period to 5 days and made the amendment widely available to the general public for comment by way of the City's website and by posting on various social media platforms including, Facebook, Twitter, Instagram, and LinkedIn.

## **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.

The following comments were received as part of the FY 2019 citizen participation process. They include testimony provided at the October 4, 2018 public hearing and the Lakewood City Council public hearing on April 15, 2019:

### Community Services Advisory Board Public Hearing – October 4, 2018

At the October 4, 2018 public hearing held by the City of Lakewood Community Services Advisory Board, the City received a total of sixteen (16) public comments. Comments received included support of housing and services for homeless individuals and those at risk of becoming homeless, including shelter and transitional housing; affordable housing development and homeownership opportunities for low and moderate income households; programs and services for at risk youth; before and after school programs for children and youths; medical and legal advocacy services for persons suffering domestic violence and abuse; food stability and food services for families and seniors in need; medical and dental services for children and youths; programs serving the LGBTQ population and those with HIV; medical assistance for low income and uninsured individuals; and advocacy programs, including health care, employment and financial assistance, for persons with limited English abilities.

### City Council Public Hearing on Approval of the FY 2019 Annual Action Plan – April 15, 2019

At the April 15, 2019 public hearing held by the Lakewood City Council, the City received one (1) public comment. Mr. Dennis Haugen recommended capping any growth in subsidized housing and any future growth should be located in close proximity to places jobs are located or are generated.

First Amendment- An ad was published in the Tacoma News Tribune, a paper of general circulation, on April 25, 2020. The notification provided for a 5-day citizen comment period (April 27, 2020 – May 1, 2020).

The City received a total of three (3) public comments. Comments included, support of grants to small businesses struggling to meet expense obligations during the governmental shutdown, funding to stabilize childcare options for Lakewood businesses, and support for mortgage assistance and foreclosure counseling services for low income households.

Second Amendment- An ad was placed in the Tacoma News Tribune on February 8, 2021. The notification provides for a 5-day citizen comment period from February 9, 2021 – February 16, 2021.

(Insert comments here)

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

There were no comments or views received that were not accepted. The comment provided on April 15, 2019 regarding the capping of growth of subsidized housing was received with no response from the City as the 2019 Annual Action Plan does not include any funding for subsidized housing.

Comments received for the 2019 AAP First Amendment have been reviewed and incorporated into the City's development of the emergency business assistance program. Funding for mortgage and foreclosure assistance are to be addressed through adoption of Lakewood's 5-YR 2020-2024 Consolidated Plan.

## **7. Summary**

Section 108 principal repayment for 2019 includes \$28,000 in principal repayment by Curbside Motors and \$47,000 in principal for repayment of the City's recently completed 108th Street Roadway Improvement project. The table below summarizes the City's Section 108 outstanding balances and scheduled principal repayments:

PROJECT	SECTION 108 BALANCE	ANTICIPATED INCOME - 2019	PRINCIPAL REPAYMENT - 2019
Curbside Motors	\$598,000	\$49,056.20	\$28,000
LASA Client Service Center	\$310,000	\$11,363.50	\$0

108th Street Roadway Imp.	\$94,000	\$0	\$47,000
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**Table 1 - Table 1 - Section 108 Loan Program - 2019**

## 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
CDBG Administrator	LAKEWOOD	Community Development Department

Table 2 – Responsible Agencies

### Narrative

In the City of Lakewood, CDBG funding is administered by the Community Development Department with oversight provided by the Council-appointed Community Services Advisory Board (CSAB) and Lakewood City Council. As a member of the Tacoma-Lakewood HOME Consortium, Lakewood receives HOME funding through the Tacoma Community Redevelopment Authority (TCRA). HOME funding allocations are initially approved by the Lakewood City Council before they are forwarded on to the TCRA for final review and approval.

### Consolidated Plan Public Contact Information

City of Lakewood

Community Development Department

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Lakewood, WA 98499

(253) 589-2489

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

### **1. Introduction**

The FY 2019 Annual Action Plan was developed to provide a general framework for addressing housing and community development needs in the City of Lakewood. In a larger sense, the plan involves a regional element to coordinate and address economic development, transportation, public services, special needs, housing, and homelessness throughout Pierce County. Coordination included consultation with the City of Tacoma, Pierce County, Pierce County Housing Authority, the Tacoma Housing Authority, and other stakeholders as provided in the 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)).**

As part of the planning process, the City of Lakewood established a committee to provide public oversight, comment on the process, and to make funding recommendations for both the CDBG and HOME programs. As part of the development of the 5-YR Consolidated Plan (2015-2019), the City solicited input through interviews, meetings, and public hearings to determine community need, priorities, and approaches to meeting those needs. Since the development of the 5-Year Plan, the City has continued to consult with many of the agencies and organizations originally polled.

The Pierce County Housing Authority and the Tacoma Housing Authority continue to work closely with the cities of Lakewood and Tacoma coordinating efforts to improve housing choice for low income households in both communities. Additionally, local housing and services providers such as Living Access Support Alliance (LASA), Greater Lakes Mental Health, Tacoma-Pierce County Habitat for Humanity, the Homeownership Center of Tacoma, Associated Ministries, Tacoma Area Coalition of Individuals with Disabilities (TACID), the Fair Housing Center of Washington, and the Tacoma Pierce County Affordable Housing Consortium among others continue to provide input and support for mental health, services, and housing options both in Lakewood and Tacoma.

As part of the City's human services funding process, monthly coalition meetings are held at the City to bring together non-profits, service providers and governmental agencies to help determine and better understand the need for housing and human services in Lakewood and throughout Pierce County. Consultation with Joint Base Lewis McChord was also conducted as a part of the consolidated planning process to determine what level of assistance military personnel and veterans were experiencing with housing need, health and human services, and mental health care assistance.

Lakewood sought comment internally from City departments on housing and community development needs and services to low income and special needs populations. On a regional level, the City consulted with Pierce County Community Connections, the City of Tacoma, United Way of Pierce County, the Pierce County Housing Authority, Tacoma-Pierce County Habitat for Humanity, local school districts, police and fire departments, and the State of Washington to better understand the needs of at risk populations such as homeless families with children, victims of domestic violence, individuals with disabilities, ethnic minorities, and the elderly.

Additional efforts to enhance and coordinate efforts between housing, health, and services providers are described throughout the Plan.

**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 Cities of Tacoma and Lakewood are actively engaged members of the Tacoma/Lakewood/Pierce County Continuum of Care. The three jurisdictions are the three most involved governmental entities in the Continuum, cooperatively working on programs to meet needs for housing and services. Both Tacoma and Lakewood support the Continuum's priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The Continuum's Centralized Intake System (Access Point 4 Housing (AP4H)) is supported by both Tacoma and Lakewood and is designed to provide assessment and rapid placement in appropriate housing, reducing vulnerability and increasing stability. The partnership strives to ensure the needs of its most vulnerable populations are met; something proving more challenging as funding sources dry up and the demand for services and housing options for the homeless and those at risk of homelessness continue to grow.

**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 Cities of Tacoma and Lakewood work closely with the Collaborative Applicant of the Continuum of Care (Pierce County) planning for allocation and use of Emergency Solutions Grant (ESG) funds. ESG policies and procedures were created and are updated periodically in cooperation with Pierce County and Tacoma to ensure that ESG subrecipients are operating programs consistently across eligible activities. Performance is reviewed by both entities. The Collaborative Applicant is also the HMIS lead

and works closely with City of Tacoma to maximize use of HMIS resources and to draw data for reports on project performance and program outcomes.

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

**Table 3 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Tacoma-Pierce County Habitat for Humanity
	<b>Agency/Group/Organization Type</b>	Housing Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Needs - Veterans Homelessness Strategy Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Tacoma-Pierce County Habitat for Humanity remains an integral part of Lakewood's approach to providing safe, decent, affordable housing to low income households in Lakewood and Tacoma. Consultation with the agency focused on housing need, market analysis, veteran housing opportunities and special needs housing. Lakewood anticipates continued coordination with Habitat will increase affordable housing options for low income families and improvements to distressed communities as older blighted homes are replaced with newly constructed affordable single family homes.
2	<b>Agency/Group/Organization</b>	Greater Lakes Mental Health
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Lakewood provides funding to the Behavior Health Contact Team which partners mental health professionals with police to assess persons in crisis & provide de-escalation, in-place treatment, and stabilization services. The team is a critical outreach tool for the City's effort to better understand and serve the homeless population in Lakewood and the needs that population may need in the way of mental health services.
3	<b>Agency/Group/Organization</b>	LASA
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	LASA was consulted as part of the planning process to better define and understand the scope and type of homeless need in Pierce County. LASA continues to be an integral provider in the fabric of homeless services and housing assistance to the homeless and those at risk of homelessness. With LASA's ongoing partnerships with the Pierce County and Tacoma Housing Authorities, and recent completion of its 15,000 SF client service center and 15-units of permanent affordable housing, LASA is uniquely positioned to understand and assist the homeless population in Lakewood and Pierce County. Partnership and coordination with LASA continues to allow Lakewood to better understand the needs of those living at or below the poverty rate and the seemingly ever-increasing demand for homeless services.

4	<b>Agency/Group/Organization</b>	City of Tacoma
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As the lead member of the Tacoma-Lakewood HOME Consortium, Tacoma remains a key partner in the development and implementation of the consolidated planning process. The City of Tacoma was consulted in the development of priorities and strategies designed to meet the various community and economic development needs identified in this Plan. Lakewood and Tacoma will continue to coordinate their efforts to ensure the goals and outcomes identified in the 5-YR consolidated Plan (2015-2019) are satisfied.
5	<b>Agency/Group/Organization</b>	Pierce County Community Connections
	<b>Agency/Group/Organization Type</b>	Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Pierce County Community Connections is a partner agency in a regional effort to end homelessness, encourage community and economic development efforts benefitting low income individuals, to expand safe, decent, affordable housing, and in the provision of public and human services to individuals in need. As a recipient of CDBG, HOME, and ESG funding, the County is a natural partner with the cities of Lakewood and Tacoma in determining a regional approach to community development.
6	<b>Agency/Group/Organization</b>	Pierce County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy



	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The Pierce County Housing Authority (PCHA) is a vital partner to the City of Lakewood in its efforts to increase and preserve affordable housing options for low income households. PCHA manages a number of programs such as scattered site public housing, Section 8 vouchers, and enterprise fund apartments to provide housing stability to many low income Lakewood households. As an operator of 285 apartment units in Lakewood, the housing authority was consulted to provide information on the need for public housing in Lakewood and in greater-Pierce County. Lakewood anticipates continued cooperation with PCHA in developing and maintaining affordable public housing options.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

N/A

**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	Pierce County	
City of Lakewood Comprehensive Plan	City of Lakewood	The plan encourages infill housing, cottage-style development, changes in zoning to permit higher densities, and incentivizes the construction of affordable housing.

**Table 4 - 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 input for the FY 2019 Annual Action Plan was conducted in accordance with the requirements established by the U.S. Department of Housing and Urban Development and the City of Lakewood Citizen Participation Plan. Citizen participation was encouraged throughout the process culminating in the development of this FY 2019 Annual Action Plan.

The process included:

- Input from community-based organizations, service providers, and local non-profit organizations.
- Oversight and review provided by the City of Lakewood Community Services Advisory Board and the Tacoma Community Redevelopment Authority (TCRA).
- Input and coordination with the City of Lakewood, City of Tacoma, and Pierce County.
- Meetings with Lakewood and Tacoma City Councils.
- Review of planning documents for local agencies.
- Solicitation of public input.

Effort to encourage citizen participation in the development of the Plan included notification of public hearings on community and economic development need, notice of availability of the plan, and community input concerning approval the final plan. Public hearings were advertised in the Tacoma News Tribune as follows:

- October 4, 2018 – Public hearing on needs
- April 1 - April 30, 2019 – Public Comment Period
- April 15, 2019 – Public hearing on FY 2019 Annual Action Plan
- April 27, 2020 - May 1, 2020 – Public Comment Period on 2019 Annual Action Plan First Amendment.
- February 9, 2021 – February 16, 2021 – Public Comment Period on 2019 Annual Action Plan Second Amendment.

A draft of the FY 2019 Annual Action Plan was made available to the public for review beginning April 1, 2019. Comments received through the citizen participation process were incorporated into the Plan. Formal approval of the final Plan was made by the City Council on May 6, 2019.

First Amendment- Notification of the proposed amendment to the 2019 AAP was published in the Tacoma News Tribune, a paper of general circulation, on April 25, 2020. The notification provided for a 5-day citizen comment period (April 27, 2020 – May 1, 2020). The amendment was made widely available to the general public for comment by way of the City's website and by posting on various social media platforms including, Facebook, Twitter, Instagram, and LinkedIn.

Second Amendment- Notification of the proposed amendment to the 2019 AAP was published in the Tacoma News Tribune on February 8, 2021. The notification provides for a 5-day citizen comment period (February 9, 2021 – February 16, 2021). The amendment was made widely available to the general public for comment by way of the City's website and by posting on various social media platforms including, Facebook, Twitter, Instagram, and LinkedIn.

## 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-targeted/broad community	Notification of public hearing on community development and public service needs for CDBG and HOME funding.	Comments detailing the public hearing are summarized in item #2 below.	N/A	
2	Public Meeting	Non-targeted/broad community	Meeting of Community Services Advisory Board on 2019 Annual Action Plan funding priorities.	No comments received.	N/A	
3	Newspaper Ad	Persons with disabilities Non-targeted/broad community	Notification of hearings and public comment period.	Comments detailing the public hearing are summarized in item #6 below.	N/A	
4	Internet Outreach	Non-targeted/broad community	Notification of hearings and provision of Annual Action Plan.	Comments detailing the public hearing are summarized in item #6 below.	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Non-targeted/broad community	Hearing attended by general public, Community Services Advisory Board members, and the Lakewood City Council.	One (1) comment received in favor of limiting subsidized housing growth.	Comment accepted; however, the City's Annual Action Plan does not propose any funding for subsidized housing in FY 2019.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Newspaper Ad	Non-targeted/broad community	Notification of hearings and public comment period.	Three (3) public comments received. Comments included, support of grants to small businesses struggling to meet expense obligations during the governmental shutdown , funding to stabilize childcare options for Lakewood businesses, and support for mortgage assistance and foreclosure counseling services for low income households.	All comments accepted; no comments not accepted.	
7	Newspaper Ad	Non-targeted/broad community	Notification of hearings and public comment period.			

**Table 5 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Funding for FY 2019 is provided by the U.S. Department of Housing and Urban Development through the Community Development Block Grant (CDBG) Program. Additional programmatic funding is being generated through program income and the reprogramming of unexpended funds from fiscal years 2016 and 2017. All funds received, and otherwise reprogrammed, will be allocated to activities in support of the goals and objectives identified in the 5-YR Consolidated Plan.

CDBG funding in FY 2019 will complete the City's five year focus on improvements to infrastructure and capital facilities with additional funding allocated to the preservation of affordable housing choice. Investments include energy efficiency street lighting improvements to low income block groups in census tract 072106 and housing rehabilitation activities meant to increase and preserve affordable housing choice for low income families and individuals. Additional activities in support of affordable housing choice include the funding of the HOME Affordable Housing Fund, which is intended to support the development of new housing and homeownership opportunities for low income households.

Public services activities will focus on access to economic opportunity through job training and apprenticeship programs for low income individuals facing multiple barriers such as lack of childcare, transportation, housing, and lack of education or training. Additional funding for public service activities will be supported with General Fund dollars in accordance with a City Council-adopted strategic plan for human services.

Homeless prevention services, specifically relocation assistance for low income individuals displaced through no fault of their own during fire or code enforcement actions, will continue to be addressed with General Fund dollars and unexpended FY 2017 CDBG funding. Finally, activities seeking the promotion of livable or viable communities are to be addressed through the elimination of slum and blight conditions in communities adversely impacted by disproportionate foreclosure and vacancy rates through the City's Neighborhood Stabilization Program 1 Dangerous and Nuisance Abatement Revolving Loan Fund.

The City of Lakewood has used a conservative approach to estimating anticipated CDBG and HOME allocations and program income to be received during the 2019 Annual Action Plan funding cycle.

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	563,124	140,000	41,324	744,448	0	Final year of 5-YR Consolidated Plan (2015-2019). Anticipated program income of \$140,000 is solely composed of RLF activities for Major Home Repair, Down Payment Assistance, and NSP1 Abatement Fund. Section 108 income of \$60,419.70 is not included in this total. CDBG-CV funds in the amount of \$350,611 are included in CDBG annual allocation amount for 2019 bringing the total to \$913,735 (\$563,124 in CDBG entitlement funds; <del>\$807,337</del> <del>\$350,611</del> in CDBG-CV funds). CDBG-CV funds are a special allocation under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, enacted March 27, 2020.
Other	public - federal	Admin and Planning Economic Development	<u>807,337</u>	0	0	<u>807,337</u>	0	CDBG-CV funding allocated through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136, enacted March 27, 2020.

Table 1 - 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**

Leverage ratios are expected maintain at levels similar to those seen in fiscal years 2017 and 2018 as funding continues to be allocated to small-scale infrastructure projects and housing rehabilitation related activities, traditionally low leverage ratio activities. Housing rehabilitation activities undertaken as part of the Major Home Repair program do not utilize match or leverage funding. The Major Home Repair program provides loans to low income households to maintain their existing home where funding would otherwise be unavailable or out of reach for many households with limited incomes. Additional activities include debt service of Section 108 funding used for infrastructure improvements, energy efficiency street lighting improvements in census tract 072106, and job training/apprenticeship programs for low income individuals; of which, only the job training/apprenticeship program will provide leveraged funding at a rate of 10.33:1 (leveraging \$465,000 with \$45,000 investment).

With funding options for infrastructure projects dwindling and the need to replace aging infrastructure growing, many communities are faced with the very real possibility of not being able to keep up with infrastructure maintenance or replacement. Historically, the CDBG and HOME programs have provided a breakwater to communities struggling to balance infrastructure needs with economic development, housing, and human services needs for low and moderate income populations. As these funds have continued to diminish, many jurisdictions have been left to scramble to fill the void.

HOME funds match requirements and leverage is provided as part of the Tacoma-Lakewood HOME Consortium and is reported in Tacoma's portion of the Plan.

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

No publicly-owned land or property is scheduled to be included as a part of this plan.

**Discussion**

## 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
<b>1</b>	Infrastructure, facilities & economic opportunity	2015	2019	Non-Housing Community Development		Community and Economic Development	CDBG: \$540,868  <u>CDBG-CV: \$103,910.41</u>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2155 Persons Assisted Jobs created/retained: 100 Jobs
<b>2</b>	Increase and preserve affordable housing choices	2015	2019	Affordable Housing Public Housing Homeless		Community and Economic Development Affordable housing choice	CDBG: \$371,566	Homeowner Housing Added: 3 Household Housing Unit Homeowner Housing Rehabilitated: 7 Household Housing Unit Buildings Demolished: 4 Buildings
<b>3</b>	Reduce homelessness and increase stability	2015	2019	Homeless Non-Homeless Special Needs		Community and Economic Development Basic services & homeless prevention/intervention	CDBG: <del>\$45,000</del>  <u>CDBG-CV: \$703,426.59</u>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: <u>200</u> <del>21</del> Persons Assisted Homelessness Prevention: 15 Persons Assisted

Table 2 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Infrastructure, facilities & economic opportunity
	<b>Goal Description</b>	Projects that support improving infrastructure, facilities, and economic opportunities, including maintaining and improving community facilities; maintaining and improving infrastructure (such as streets, sidewalks, and ADA improvements); improvements to facades and other projects to attract and support businesses; support for microenterprises and small business development; historic preservation; and removal of slums and blight. Projects associated with this strategic plan goal for FY 2019: 1) Low Income Street Lighting; 2) Repayment of Section 108 principal and interest for 108th St. Roadway Improvement project; and 3) Small Business Emergency Services Program (CDBG-CV).
2	<b>Goal Name</b>	Increase and preserve affordable housing choices
	<b>Goal Description</b>	Projects contributing to increasing affordable housing choice, including home repairs and weatherization to preserve the condition of owner-occupied units; down payment assistance for homebuyers; developing new rental housing opportunities; rehabilitation of rental housing; supporting development of new subsidized housing; and increasing permanent supportive housing. Programs associated with this strategic plan goal for FY 2019: 1) Major Home Repair/Sewer Loan Program (including program income/RLF); and 2) CDBG Down Payment Assistance (including program income/RLF); 3) NSP1 Dangerous Building Abatement Program (including program income/RLF); and 4) CDBG Administration of HOME Housing Services.
3	<b>Goal Name</b>	Reduce homelessness and increase stability
	<b>Goal Description</b>	<p>Projects contributing to reducing homelessness and increasing stability of Lakewood residents, including providing supportive services to meet basic needs; providing supportive services to move toward self-sufficiency; projects that provide job training and education; emergency services, including support for shelters and transitional housing; and supportive services for persons with special needs.</p> <p>Activities carried out in FY 2019 <i>and 2020</i> will include: 1) <u>Emergency Payments for Rental/Mortgage Assistance (CDBG-CV)</u> <del>WorkForce Central Apprenticeship Training</del>; and 2) Emergency Assistance for Displaced Persons (funded through unexpended FY 2017 EADR CDBG allocation).</p>

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

Lakewood anticipates it will provide affordable housing to the following low income households:

Extremely low income families (30% AMI): 3 families assisted with CDBG/ 1 family assisted with HOME

Low income families (50% AMI): 2 families assisted with CDBG/ 3 families assisted with HOME

Moderate income families (80%): 2 families assisted with CDBG/ 3 families assisted with HOME

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The projects listed and described in this plan represent the proposed use of funds for the FY 2019 CDBG program.

#	Project Name
1	Low Income Street Lighting- CT 072106
2	Major Home Repair/Sewer Loan Program
3	CDBG Administration of HOME Housing Services
4	Administration
5	Section 108 Repayment of 108th Street Roadway Improvements
6	NSP1 Abatement Program
7	<del>WorkForce Central Apprenticeship Training Program</del>
8	Emergency Assistance for Displaced Residents
9	Small Business Emergency Services Program- CDBG-CV
<u>10</u>	<u>Emergency Payments for Rental/Mortgage Assistance- CDBG-CV</u>

**Table 3 – Project Information**

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

Through a planning and citizen participation process, FY 2019 policies and priorities were developed for addressing community and economic development, removal of blight, revitalizing underserved neighborhoods, eliminating threats to public health and safety, and conserving/expanding stocks of affordable housing. Included in this process was a review of alternative funding sources, including City General Funds, State and other local funding sources available to meet an array of needs. As a result of this process, the Lakewood City Council adopted the following policies and priorities for the use of FY 2019 CDBG and HOME funds in order of priority:

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

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	Low Income Street Lighting- CT 072106
	<b>Target Area</b>	
	<b>Goals Supported</b>	Infrastructure, facilities & economic opportunity
	<b>Needs Addressed</b>	Community and Economic Development
	<b>Funding</b>	CDBG: \$164,257
	<b>Description</b>	Project will install new LED street lighting in low income residential neighborhoods where no or limited street lighting exists.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 2,115 households will be served by this activity, of which 1,350 (62.7%) are low income households.
	<b>Location Description</b>	Project to be carried out in census tract 072106.
	<b>Planned Activities</b>	Installation of 38 new LED streetlights where no or limited street lighting exists.
<b>2</b>	<b>Project Name</b>	Major Home Repair/Sewer Loan Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase and preserve affordable housing choices
	<b>Needs Addressed</b>	Affordable housing choice
	<b>Funding</b>	CDBG: \$266,208
	<b>Description</b>	Program provides home repair and/or sewer connection loans to eligible low income homeowners. Funding for program provided through FY 2019 entitlement funding and revolving loan funds.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 6 low income households will be assisted with housing rehabilitation activities or side sewer connections.
	<b>Location Description</b>	City-wide

	<b>Planned Activities</b>	The project will provide major home repair/sewer connection loans which include connection of side-sewer to sewer main, decommissioning of septic systems, roofing, removal of architectural barriers, plumbing, electrical, weatherization, major systems replacement/upgrade, and general home repairs for eligible low income homeowners. Program funding includes a total of \$65,000 in program income to be used for similar RLF activities.
<b>3</b>	<b>Project Name</b>	CDBG Administration of HOME Housing Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase and preserve affordable housing choices
	<b>Needs Addressed</b>	Affordable housing choice
	<b>Funding</b>	CDBG: \$30,358
	<b>Description</b>	Program administration and housing services in support of HOME Program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	A total of 4 low income households will be assisted.
	<b>Location Description</b>	City-wide
<b>4</b>	<b>Planned Activities</b>	Program administration and housing services in support of HOME Program.
	<b>Project Name</b>	Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$112,625; <u>CDBG-CV \$53,999.54</u> <del>25,000</del>
	<b>Description</b>	Administration to implement and manage the Consolidated Plan funds.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	

	<b>Planned Activities</b>	Activities include support of program management, coordination, monitoring, and general evaluation of program activities, including management of CDBG-CV funding allocation.
5	<b>Project Name</b>	Section 108 Repayment of 108th Street Roadway Improvements
	<b>Target Area</b>	
	<b>Goals Supported</b>	Infrastructure, facilities & economic opportunity
	<b>Needs Addressed</b>	Community and Economic Development
	<b>Funding</b>	CDBG: \$51,000
	<b>Description</b>	CDBG repayment of Section 108 loan for 108th Street Roadway Improvements (Activities #184 & #192).
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Section 108 loan repayment of 108th Street Roadway Improvements project.
	<b>Planned Activities</b>	Section 108 principal and interest repayment of 108th Street Roadway Improvements project.
6	<b>Project Name</b>	NSP1 Abatement Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Increase and preserve affordable housing choices
	<b>Needs Addressed</b>	Affordable housing choice Community and Economic Development
	<b>Funding</b>	:
	<b>Description</b>	Provides funding for the abatement of dangerous buildings that have been foreclosed, abandoned or are vacant. Activities funded with revolving loan fund.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City of Lakewood anticipates it will demolish a total of 4 dangerous buildings located in low income block groups in FY 2019.
	<b>Location Description</b>	City-wide



	<b>Planned Activities</b>	Provides funding for the abatement of dangerous buildings that have been foreclosed, abandoned or are vacant. Funding for the program is provided through revolving loan funds generated from previous NSP1 abatement activities. Program funding includes a total of \$75,000 in program income to be used for similar RLF activities.
7	<b>Project Name</b>	<del>WorkForce Central Apprenticeship Training Program</del>
	<b>Target Area</b>	
	<b>Goals Supported</b>	<del>Reduce homelessness and increase stability</del>
	<b>Needs Addressed</b>	<del>Basic services &amp; homeless prevention/intervention Community and Economic Development</del>
	<b>Funding</b>	<del>CDBG: \$45,000</del>
	<b>Description</b>	<del>Program provides job training and apprenticeship programs for low income individuals facing multiple barriers such as lack of childcare, transportation, housing, and lack of education or training.</del>
	<b>Target Date</b>	<del>6/30/2020</del>
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	<del>A total of 21 low income Lakewood residents will be served with this program.</del>
	<b>Location Description</b>	<del>Pierce County Pre Apprenticeship Center, 12180 Park Ave. S., Tacoma, WA 98447</del>
8	<b>Planned Activities</b>	<del>The program will provide access to economic opportunity through job training and apprenticeship programs for low income individuals facing multiple barriers such as lack of childcare, transportation, housing, and lack of education or training. Activities will be carried out by WorkForce Central.</del>
	<b>Project Name</b>	Emergency Assistance for Displaced Residents
	<b>Target Area</b>	
	<b>Goals Supported</b>	Reduce homelessness and increase stability
	<b>Needs Addressed</b>	Affordable housing choice Basic services & homeless prevention/intervention
	<b>Funding</b>	:

	<b>Description</b>	Program provides emergency relocation assistance to eligible low income households that are displaced through no fault of their own during building and code enforcement closures, fires, redevelopment, and other incidences resulting in homelessness. Funding provided through unexpended FY 2017 EADR (Activity #206).
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The Emergency Assistance for Displaced Residents program will provide relocation assistance to 15 low income persons.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Program provides emergency relocation assistance for qualifying low income households displaced through no fault of their own during building and code enforcement closures, fires, redevelopment, and other incidences creating homelessness.
9	<b><u>Project Name</u></b>	Small Business Emergency Services Program- CDBG-CV
	<b><u>Target Area</u></b>	
	<b><u>Goals Supported</u></b>	Infrastructure, facilities & economic opportunity
	<b><u>Needs Addressed</u></b>	Community and Economic Development
	<b><u>Funding</u></b>	<u>CDBG-CV: \$103,910.41</u>
	<b><u>Description</u></b>	The Small Business Emergency Services Program will provide much needed capital assistance to small businesses (10 employees or fewer) impacted by the ongoing coronavirus shutdown in effort to sustain these business from shuttering their doors and laying off employees. The project will meet a national objective of 570.208(a)(4) Job Creation or Retention through the creation or retention of job opportunities for low and moderate income individuals or 570.208(a)(2) Limited Clientele for assistance to microenterprise.
	<b><u>Target Date</u></b>	9/30/2020
	<b><u>Estimate the number and type of families that will benefit from the proposed activities</u></b>	LMI Job Creation/Retention: 100 Jobs Created/Retained Limited Clientele: 10 Microenterprise - LMI Owned
	<b><u>Location Description</u></b>	City-wide

	<b><u>Planned Activities</u></b>	The Small Business Emergency Services Program will provide capital assistance to small business and microenterprises affected by the impacts of the coronavirus outbreak in effort to sustain business and create/retain jobs for low and moderate income employees who may otherwise have been laid off or terminated without such assistance.
<b>10</b>	<b><u>Project Name</u></b>	<b><u>Emergency Payments for Rental/Mortgage Assistance- CDBG-CV</u></b>
	<b><u>Target Area</u></b>	
	<b><u>Goals Supported</u></b>	<b><u>Increase and preserve affordable housing choices</u></b> <b><u>Reduce homelessness and increase stability</u></b>
	<b><u>Needs Addressed</u></b>	<b><u>Affordable housing choice</u></b> <b><u>Basic services &amp; homeless prevention/intervention</u></b>
	<b><u>Funding</u></b>	<b><u>CDBG-CV: \$703,426.59</u></b>
	<b><u>Description</u></b>	<b><u>Emergency Payments for Rental/Mortgage Assistance for low- and moderate-income individuals affected by the coronavirus pandemic. Program will provide assistance payments for renters and homeowners who are behind on housing payments due to economic impacts of the coronavirus. Payments will not exceed six months and \$4,000 per household assisted.</u></b>
	<b><u>Target Date</u></b>	<b><u>9/30/2021</u></b>
	<b><u>Estimate the number and type of families that will benefit from the proposed activities</u></b>	<b><u>A total of 200 low- and moderate-income individuals will be assisted.</u></b>
	<b><u>Location Description</u></b>	<b><u>City-wide</u></b>
	<b><u>Planned Activities</u></b>	<b><u>Program provides emergency rental and mortgage assistance payments to low- and moderate-income households economically impacted by the coronavirus. Assistance payments not to exceed \$4,000 per household and not more than 6 months.</u></b>

## **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**

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 continue to be concentrated in these areas. Many of these block groups tend to have a higher concentration of renter-occupied housing units that suffer from a general state of slums and blight, large concentrations of aged housing stock suffering from a lack of routine maintenance, and infrastructure improvements that are either inadequate or are outdated in accordance with current development requirements.

In Lakewood's final year of the 5-YR Consolidated Plan (2015-2019), funding prioritization will focus on infrastructure investments to low income neighborhoods where the infrastructure is either lacking or inadequate to ensure public safety and accessibility, and on increasing and preserving affordable housing choice through housing rehabilitation and the construction of new affordable homes. Funding for street lighting improvements in 2019 seeks to address infrastructure investment in Census Tract 072106 by installing street lighting where no or limited lighting exists. The City plans to continue targeting the low income Census Tract 072000 with its Major Home Repair/Sewer Loan Program which assists low and moderate income homeowners with connection fees and construction costs associated with the connection to sewers. For all other funding, the City has not identified specific targeted areas; programs are open to all eligible low and moderate income individuals city-wide.

### **Geographic Distribution**

Target Area	Percentage of Funds

**Table 6 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

N/A

### **Discussion**

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

An area of great concern for low and moderate income populations continues to be housing choice and access to decent affordable housing, especially those in metropolitan areas. Although household incomes have seen increases in all four previous years of the 5-YR Consolidated Plan, Lakewood's median income of \$47,636 (2013-2017 American Community Survey) remains far below that of the county (\$63,881) and the United States (\$57,652). Of additional concern is Lakewood's apparent concentration of families living below the poverty rate- 15% compared to 8.3% for the county and 10.5% for the United States (2013-2017 American Community Survey). Even though median incomes have risen each of the last four years, so have housing related expenses, leaving little relief for low income households who are traditionally burdened with housing related expenses exceeding 30 percent of household income.

With the median home price in Lakewood at \$232,600 (2013-17 American Community Survey) and percentage increases continuing into the double digits, the dream of owning a home remains out of reach for many, if not all low income households. Echoing this problem is the steady increase in the cost of rents year over year. With the median gross monthly rent now standing at \$926 (2013-2017 American Community Survey), housing cost is easily outstripping income growth, especially for low and moderate income households. These issues of rising housing costs relative to household incomes become strikingly apparent when looking at the percentages of Lakewood households where monthly housing cost exceeds 30 percent of household income- 36.8% for households with a mortgage and 56.7% for households who rent (2013-2017 American Community Survey).

As market forces push investment toward more profitable market rate housing, the lack of investment in and increasing need for affordable housing is placing an ever-increasing demand on communities to develop affordable housing options for low and moderate income households.

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

The City of Lakewood encourages the development of affordable housing through the City's Comprehensive Plan. The Plan addresses future housing needs for current and future residents of all incomes. Policies offers density bonuses to developers of affordable housing, encourage infill housing, cottage-style development, changes in zoning to permit higher densities, and incentivizes the construction of affordable housing.

Additional means used to encourage affordable development is through the City's Multifamily Tax Credit program which allows developers to defer taxes on valuation improvements for all housing repairs for up to 12 years within certain urban use centers. This is especially important in areas where development is stymied by conditions of blight, the lack of infrastructure, or where rents are not conducive to sustaining redevelopment activities. With the tax deferral, the development of new housing or the modernization of existing substandard units can be incentivized as a means of neighborhood revitalization.

## **Discussion**

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

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

The City will continue to support fair housing education and other activities that support fair housing for all. Potential activities include workshops focused on education and the equal application of landlord/tenant and fair housing laws and relocation assistance for individuals at risk of homelessness through no fault of their own due to discriminatory housing practices, or as a result of building and code enforcement closures, fires, or redevelopment activities. Funding for Lakewood's relocation assistance program is provided through unexpended CDBG funding allocated in FY 2017, and a grant provided by the Nisqually Indian Tribe.

In FY 2019, the City will continue to offer an emergency housing repair program for households that do not qualify for the City's CDBG and HOME-funded programs. The program will utilize grant funds provided by the Nisqually Indian Tribe to make emergency repairs to low income, owner-occupied households who otherwise lack the means or the equity to make the necessary repairs.

Efforts to address unequal access to economic opportunity are to be made through support of job training/apprenticeship programs for low income individuals facing multiple barriers such as lack of childcare, transportation, housing, and lack of education or training. Training will focus on pre-apprenticeship technical and trade skills associated with the construction-related fields.

Additional actions to address the needs of Lakewood's underserved population are addressed with a 1% allocation from the General Fund; strategic priorities include stabilization services, access to health and behavioral health, youth programs, and housing assistance.

#### **Actions planned to foster and maintain affordable housing**

Lakewood recognizes the importance affordable housing and homeownership play in building vibrant communities. In 2019, the City continues its partnership with Tacoma-Pierce County Habitat for Humanity and the Homeownership Center of Tacoma in redeveloping vacant, abandoned and blighted properties into new homeownership opportunities for low income families. Both partners are actively acquiring troubled properties in Lakewood and have multiple active construction sites.

Efforts to maintain existing owner occupied housing are supported through the Major Home Repair/Sewer Loan Program, HOME Housing Rehabilitation, and Nisqually Repair Funds, while multifamily housing is supported and encouraged with Lakewood's HOME Affordable Housing Fund as

well as through zoning density bonuses offered to developers of affordable housing. With homeownership opportunities becoming more difficult as housing process creep higher, the City offers low income homebuyers aid with down payment assistance programs designed to help meet the minimum cash investment necessary to qualify for a conventional home loan.

Rental affordability and habitability remain a priority for the City. With approximately 53 percent of Lakewood's housing stock being rental, and more than 65 percent of Lakewood's housing stock constructed prior to 1960, there exists the real possibility that a larger percentage of that stock lacks adequate and proper maintenance. To such end, in 2017, the City began its Rental Housing Safety Program (RHSP) which requires all residential rental properties (apartments, single family homes, duplexes, etc.) within the Lakewood city limits be registered on an annual basis and to maintain specific life and safety standards for those properties. Inspections of rental properties began in April 2018. Initial returns show that approximately 80 percent of rental units have complied with the program and registered their rental properties through the City's portal. In 2018, a total of 485 rental properties and 1,685 individual rental units were inspected through the program. Of those units inspected, the City has seen an 83.5% initial inspection failure rate with most common failure items being lack of GFCI electrical protection, missing or nonfunctional smoke and carbon monoxide detectors, electrical hazards, and compromised or failing structural components.

Since substandard housing disproportionately affects the poor, working class families, seniors, the disabled, and persons who suffer from chronic illness, it is the aim of the RHSP to eventually eliminate all substandard rental housing in Lakewood and by doing so, to improve not only the quality of life for low income individuals, but the lives of all Lakewood residents.

### **Actions planned to reduce lead-based paint hazards**

In accordance with the Washington State Renovation, Repair and Painting Program and 24 CFR Part 35, subparts A, B, J, K, and R, the City of Lakewood requires that all projects/homes receiving CDBG or HOME funds that were built prior to 1978, with construction costs over \$5,000, be inspected and analyzed for the presence of lead-based paint or are to be presumed to contain lead. All lead hazards be identified through this process are required to be brought into compliance with Title X of the Housing and Community Development Act of 1992 as part of the project's scope of work. CDBG and HOME funds may be provided for testing, risk assessment, and clearances for eligible activities.

With approximately 65% of Lakewood's 26,453 housing units being built prior to 1978, there exists the potential for some 17,000 housing units to contain lead-based paint hazards. To inform the community of the hazards of lead-based paint, the City offers copies of the EPA's "Protect Your Family from Lead in Your Home" and HUD's "Renovate Right" pamphlets at City Hall and provides copies of these pamphlets to all housing repair program applicants. As part of the City's single and multifamily housing programs, XRF paint inspections and Risk Assessments are conducted, lead-safe work is conducted by Washington



State certified RRP renovation contractors, abatement work is conducted by certified abatement contractors, and Clearance testing of all disturbed surfaces is performed by certified Risk Assessors.

In FY 2019, the City expects to conduct lead paint inspections on all pre-1978 properties funded with the down payment assistance program and all properties where persons are relocated to with the Emergency Assistance for Displaced Residents. Risk assessments are to be conducted on all pre-1978 homes served by housing repair programs where painted surfaces are to be disturbed as part of the scope of repairs. When completed, all homes will be free of lead-based paint hazards.

### **Actions planned to reduce the number of poverty-level families**

Actions to reduce the number of poverty-level families include the funding of vital services and programs focused on outcome driven, client centered services that lead to housing stability and economic opportunity. Funding through the 1% human services allocation is targeted to programs that provide low income households with housing stability, basic needs (health, food, clothing, etc.), and services directed towards self-sufficiency (domestic violence, child care, job training, client advocacy, homeless services etc.). For 2019, the City has allocated \$360,000 in General Fund dollars in support of these programs.

Lakewood understands an important vehicle for moving low and moderate income persons from a state of poverty to one of self-sufficiency is housing stability. Whether housing stability can be achieved through safe, decent affordable rental housing or through affordable homeownership opportunities, the benefit of a stable, affordable housing has long been a pathway to economic mobility. It is with this in mind the City of Lakewood continues to offer affordable homeownership opportunities through its down payment assistance program and partnerships with Habitat for Humanity and the Homeownership Center of Tacoma. Additional measures come in the way of the City's housing rehabilitation programs which focus on maintaining housing affordability through remedying deferred maintenance and code related deficiencies for owner occupied properties.

Additional effort to reduce the number of poverty-level families include support of job training and apprenticeship programs for low income individuals facing multiple barriers to employment such as lack of education or training, transportation, and childcare. Training will focus on technical/trade skills and certifications associated with direct employment opportunities or entry into apprenticeship programs within the construction industry. With projected growth in the construction industry of up to 11 percent by 2026 (Employment Projections 2016-26, Bureau of Labor Statistics, January 30, 2019) and wages well above the national median annual wage, opportunities exist for low income individuals, with or without post-secondary education, to earn a decent family wage and lift themselves from poverty.

## **Actions planned to develop institutional structure**

In an effort to better coordinate expenditures of the U.S. Department of Housing and Urban Development-funded CDBG and HOME programs and the General fund-funded human services program, the City has tasked the Community Services Advisory Board (CSAB) with policymaking and general funding recommendation authority as they relate to community development and human services activities city-wide. Board responsibilities include facilitating the cooperation and coordination of human services and Consolidated Plan activities, holding public hearings to receive input on community development and human service's needs, developing policy guidance and program evaluation criteria, and making funding recommendations. On the human services side, the Board is responsible for reviewing needs assessments and gap analyses in order to develop a strategic action plan. Additionally, the Board provides guidance and recommendations in preparing the City's CDBG and HOME funding policies and priorities, Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance Evaluation Report. As part of the Section 108 process, the Board serves as a review panel for potential loan applicants.

With regard to the Tacoma-Lakewood HOME consortium and the allocation of HOME funds, the City of Tacoma has established the Tacoma Community Redevelopment Authority (TCRA), a public corporation organized and dedicated to the administration of federal grants and programs such as the Community Development Block Grant and HOME Investment Partnerships Program. The TCRA is responsible for administering the HOME Program, including the review of all housing programs for both Tacoma and Lakewood. The Board is staffed by ten Board members and is supported by City of Tacoma staff.

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

The City is the convener of monthly human services Collaboration meetings. Collaboration partners include for-profit and nonprofit providers of housing, services, homeless programs, dv and family services, youth programs, food banks, and healthcare services.

Pierce County homeless providers, developers and governmental agencies have joined to develop a comprehensive plan for a coordinated care system 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 this 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 plan of reducing homelessness.

With the continued growth in homeless populations seemingly everywhere comes a need to focus effort and resources in combating this growing problem. As a member of the Tacoma/Pierce County Coalition,

Lakewood continues to work with Tacoma and Pierce County in adapting the Continuum to better target the causes and solutions to chronic homelessness throughout Pierce County using emerging best practices and a comprehensive outreach strategy. Efforts include developing a housing first approach that addresses a wide array of causes and solutions, including using data to quickly and effectively move people from homelessness, using a comprehensive outreach strategy to engage unsheltered individuals, and linking housing and human services with job training, skills training or education to ensure every individual has the means to exit homeless and the wherewithal to remain housed once they've exited homelessness.

The City continues to maintain collaborative relationships with many nonprofit agencies, local housing authorities, mental and social service agencies, and local and State governmental agencies to provide access to health care and other programs and services, provide a continuum of affordable housing, support education and training opportunities to aid in obtaining livable-wage jobs, and promote services that encourage self-sufficiency as a lasting solution to breaking the cycle of poverty.

## **Discussion**

## Program Specific Requirements

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

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

#### Discussion

The aggregate use of CDBG funds, including CDBG-CV funds, 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.

## Attachments

## Citizen Participation Comments

### 2019 AAP First Amendment Public Comments

Attached are copies of public comments received as part of the City of Lakewood 2019 Annual Action Plan First Amendment. Comments were accepted during the City's public hearing period of April 27, 2020 – May 1, 2020.

#### Comment #1:

May 8, 2020

Jeff Gumm, Manager

Community Housing Programs

City of Lakewood

6000 Main Street, Lakewood WA 98499

Dear Jeff,

It seems every organization in our community has been adversely impacted by COVID-19 and Habitat for Humanity is no exception. In addition to closing our retail stores, furloughing 17 staff members, closing construction sites to all volunteers, many of our homeowners are unable to make their mortgage payments.

As you consider how the county should distribute funds to aid the community during this crisis, we urge you to **include funds for mortgage relief for low - income homeowners and funding for increased housing counseling**. The last recession resulted in a sea for foreclosures (disproportionally by families of color) and entire neighborhoods flipping from

homeownership to rental housing owned by national investment groups. This is an ugly chapter we cannot repeat.

As of April 15<sup>th</sup>, 10% of Habitat Homeowners have expressed need for mortgage assistance due to job loss and we are bracing for this number to increase as this pandemic continues. In the next 12-24 months, we anticipate the community will have a dramatic increased need for foreclosure prevention and mortgage assistance. Foreclosures result in years of trashed credit, emotional scars and displacement. And every homeowner that loses their home becomes another person looking for affordable rental housing that our community was already in dire need of *before* COVID-19.

The National Low Income Housing Institute has warned that as the pandemic wears on, we can expect the number of households experiencing housing instability to increase rapidly and they will need someone to turn to for help. Habitat is committed to providing that support.

It may interest you to know, Habitat is in process of becoming a HUD certified counseling agency – an endeavor we began before the pandemic. When this certification is complete, we will be **only the second HUD certified counseling agency in Pierce County** and are prepared to roll out a robust foreclosure prevention program for our modest-income neighbors. Facing a recession estimated to be greater than that of 2008, Habitat is committed to helping families maintain the stability and self-reliance homeownership provides.

I look forward to discussing with you how Habitat can partner with you to serve local families with foreclosure prevention and mortgage assistance. Please give me a call at 253.255.9065 or email at [mfife@tpc-habitat.org](mailto:mfife@tpc-habitat.org).

In partnership,

Maureen Fife

CEO

**Comment #2:**

Mr. Gumm:

I own a Lakewood-based business, Tacoma Trophy. I understand the Small Business Emergency Services Program aims to sustain Lakewood businesses. With that goal, I urge the council and city leaders to use the funding available for grants to Lakewood businesses. I further urge the council and city leaders to enable businesses receiving those grants to use the funding where the business needs it most. I urge the city to refrain from adopting highly restrictive or prescriptive grant conditions. In the current economic climate, those businesses operating in a reduced capacity or not operating at all need the flexibility to stretch what money they can get to cover what's most significant for them and their operations. Businesses lucky enough to receive PPP funding, EIDL funding, county loan funding or other funding generally cannot apply any of that money toward equipment lease payments, vendor payments or federal payroll taxes. Yet, these obligations amount to sizable expenses each month, and businesses that fall too far behind on these types of payments risk losing everything.

Judi Brown, Owner

Getting Personal Imprinting LLC dba



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Lakewood WA 98499

253.302.5566

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**Comment #3:**

Hi Briana,

I wanted to reach out to share one thing to consider for the CARES funding program I read about on the city Facebook page. Please consider devoting some of the funding to stabilizing child care options in Lakewood. There are numerous licensed family child care providers and small centers within the city limits and they are essential to the success of other businesses.

Child care operates on razor thin margins so any disruption to enrollment and revenue can have dramatic impacts on their ability to stay open. Some providers have already closed their doors for various reasons.

According to a survey of 11,500 child care providers conducted by the National National Association for the Education of Young Children (NAEYC) from March 12-25, nearly 50% say they would not survive a closure of more than two weeks without significant public investment and support, and 25% say they don't know how long they could close and still re-open without support.

Please consider supporting child care providers with grants to stabilize and support their businesses.

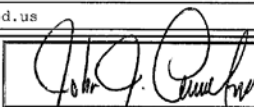
Marianna Ross

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

OMB Number: 4040-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/>		
<b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> <input type="text" value="06/02/2020"/>		<b>4. Applicant Identifier:</b> <input type="text" value="B-20-MW-53-0016"/>
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> <input type="text" value="City of Lakewood"/>		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="91-1698185"/>		<b>* c. Organizational DUNS:</b> <input type="text" value="9494627580000"/>
<b>d. Address:</b>		
<b>* Street1:</b> <input type="text" value="6000 Main St. SW"/>		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> <input type="text" value="Lakewood"/>		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> <input type="text" value="WA: Washington"/>		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> <input type="text" value="USA: UNITED STATES"/>		
<b>* Zip / Postal Code:</b> <input type="text" value="98499-5019"/>		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> <input type="text" value="Community Development"/>		<b>Division Name:</b> <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> <input type="text" value="Mr."/> <b>* First Name:</b> <input type="text" value="M."/>		
<b>Middle Name:</b> <input type="text" value="David"/>		
<b>* Last Name:</b> <input type="text" value="Bugher"/>		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> <input type="text" value="Assistant City Manager"/>		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> <input type="text" value="253-589-2489"/>		<b>Fax Number:</b> <input type="text"/>
<b>* Email:</b> <input type="text" value="dbugher@cityoflakewood.us"/>		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>		
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>		
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>		
<b>* Other (specify):</b> <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14-218"/> <b>CFDA Title:</b> <input type="text" value="Community Development Block Grant Program"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="14-218"/> <b>* Title:</b> <input type="text" value="Community Development Block Grant Program"/>		
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Community Development Block Grant Program Application (Cares Act Funding)"/>		
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"/>		

<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input type="text" value="6 &amp; 10"/>	* b. Program/Project <input type="text" value="6 &amp; 10"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="06/02/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="350,611.00"/>
* 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="350,611.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>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)</b> <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="John"/>
Middle Name: <input type="text" value="J."/>	
* Last Name: <input type="text" value="Caulfield"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager"/>	
* Telephone Number: <input type="text" value="253-589-2489"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="jcaulfield@cityoflakewood.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/02/2020"/>

# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

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

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

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

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

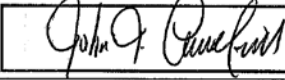
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Lakewood	06/02/2020

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

## CERTIFICATIONS

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

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

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

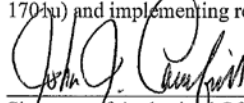
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

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

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

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

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.



Signature of Authorized Official

06/02/2020

Date

\_\_\_\_\_  
City Manager  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year 2019, shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

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

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

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

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1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.



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

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

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

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

06/02/2020  
Date

City Manager  
Title

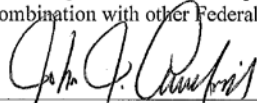
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The HOME participating jurisdiction certifies that:

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

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

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

  
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Signature of Authorized Official

06/02/2020  
Date

City Manager  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

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

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> 05/15/2019		<b>4. Applicant Identifier:</b> B-19-MC-53-0016
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> City of Lakewood		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> 91-1698185		<b>* c. Organizational DUNS:</b> 9494627580000
<b>d. Address:</b>		
<b>* Street1:</b> 6000 Main St. SW		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> Lakewood		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> WA: Washington		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> USA: UNITED STATES		
<b>* Zip / Postal Code:</b> 98499-5019		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Community Development		<b>Division Name:</b> <input type="text"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> Mr.		<b>* First Name:</b> M.
<b>Middle Name:</b> David		
<b>* Last Name:</b> Bugher		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> Assistant City Manager for Development		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> 253-589-2489		<b>Fax Number:</b> <input type="text"/>
<b>* Email:</b> dbugher@cityoflakewood.us		

<b>Application for Federal Assistance SF-424</b>		
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <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"/>		
<b>* Other (specify):</b> <input type="text"/>		
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>		
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14-218"/>		
<b>CFDA Title:</b> <input type="text" value="Community Development Block Grant Program"/>		
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="14-218"/>		
<b>* Title:</b> <input type="text" value="Community Development Block Grant Program"/>		
<b>13. Competition Identification Number:</b> <input type="text"/>		
<b>Title:</b> <input type="text"/>		
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>		
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Community Development Block Grant Program Application"/>		
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	
<b>16. Congressional Districts Of:</b>	
* a. Applicant <input style="width: 100px;" type="text" value="6 &amp; 10"/>	* b. Program/Project <input style="width: 100px;" type="text" value="6 &amp; 10"/>
Attach an additional list of Program/Project Congressional Districts if needed. <div style="display: flex; justify-content: space-between; align-items: center;"> <input style="width: 200px;" type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>17. Proposed Project:</b>	
* a. Start Date: <input style="width: 100px;" type="text" value="07/01/2019"/>	* b. End Date: <input style="width: 100px;" type="text" value="06/30/2020"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	563,124.00
* b. Applicant	<input style="width: 150px;" type="text"/>
* c. State	<input style="width: 150px;" type="text"/>
* d. Local	<input style="width: 150px;" type="text"/>
* e. Other	<input style="width: 150px;" type="text"/>
* f. Program Income	<input style="width: 150px;" type="text"/>
* g. TOTAL	563,124.00
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input style="width: 100px;" type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <div style="display: flex; justify-content: space-between; align-items: center;"> <input style="width: 200px;" type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div> </div>	
<b>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)</b> <input checked="" type="checkbox"/> ** I AGREE <small>** 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.</small>	
<b>Authorized Representative:</b>	
Prefix: <input style="width: 100px;" type="text" value="Mr."/>	* First Name: <input style="width: 200px;" type="text" value="John"/>
Middle Name: <input style="width: 200px;" type="text" value="J."/>	
* Last Name: <input style="width: 300px;" type="text" value="Caulfield"/>	
Suffix: <input style="width: 100px;" type="text"/>	
* Title: <input style="width: 300px;" type="text" value="City Manager"/>	
* Telephone Number: <input style="width: 150px;" type="text" value="253-589-2489"/>	Fax Number: <input style="width: 150px;" type="text"/>
* Email: <input style="width: 300px;" type="text" value="jcaulfield@cityoflakewood.us"/>	
* Signature of Authorized Representative:	* Date Signed: <input style="width: 100px;" type="text" value="5/13/2019"/>

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 01/31/2019

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

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

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

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

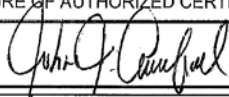
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Lakewood	DATE SUBMITTED 5/13/2019

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



## CERTIFICATIONS

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

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

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

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

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

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

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

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

5/13/2019  
Date

  
Title

### **Specific Community Development Block Grant Certifications**

The Entitlement Community certifies that:

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

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

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

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

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

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year 2019, 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.

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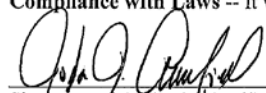
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\_\_\_\_\_  
Signature of Authorized Official

5/13/2019  
Date

  
\_\_\_\_\_  
Title

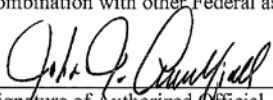
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\_\_\_\_\_  
Signature of Authorized Official

5/13/2019  
Date

  
\_\_\_\_\_  
Title

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