

DRAFT HOME-ARP ALLOCATION PLAN FOR PUBLIC COMMENT

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: City of Bellingham

Date: 3/31/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

NOTE: THE PLAN OUTLINED BELOW IS A PRELIMINARY *DRAFT* ALLOCATION PLAN, SUBJECT TO MODIFICATIONS AND FEEDBACK VIA PUBLIC COMMENT. SOME AREAS OF THIS PLAN WILL BE INTENTIONALLY LEFT BLANK BELOW, AND

WILL BE COMPLETED UPON THE CLOSE OF THE PUBLIC COMMENT PERIOD ON 4/18/2022.

A survey was sent soliciting feedback on where and how the City should allocate its HOME-ARP funding award to various members of the public, including staff representatives for various non-profit housing developers, non-profit service providers, the housing authority, other governmental agencies, and other community organizations.

These survey responses were catalogued and utilized to inform the City's draft allocation plan, which was then published to the City website for a period of 15 calendar days (upon which members of the public were invited to submit public comments on the draft plan).

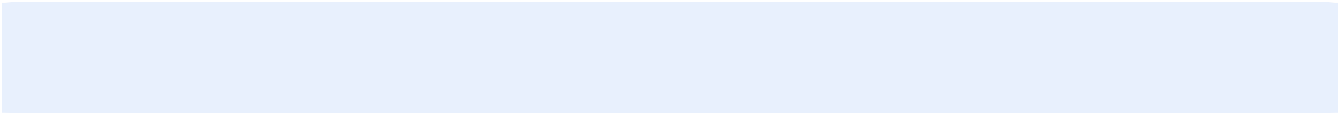
Targeted outreach was made to solicit survey feedback from members of: various diversity-focused and human rights organizations in the community, including the Whatcom Dispute Resolution Center, Whatcom Human Rights Taskforce, the Multicultural Center on Western's campus, Community 2 Community Development, Unity Care Northwest, and SeaMar Community Health Center; housing and services providers and the local public housing authorities (see list in the table); Whatcom County (the local CoC agency), specifically Health Department staff working on homelessness and veteran's services; Domestic Violence and Sexual Assault Services of Whatcom County (DVSAS); and agencies serving those with disabilities, including Max Higbee Center and Northwest Regional Council (NWRC). These specific agencies were notified about the City's desire to engagement with them on these issues, the survey opportunity and the availability of the draft plan, and the opportunity to comment.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Opportunity Council	Non-profit service provider	Emails and Survey	Feedback.
Lydia Place	Non-profit service provider	Email and Survey	Feedback.
Northwest Youth Services	Non-profit service provider	Email and Survey	Feedback.
DVSAS	Non-profit service provider	Email and Survey	Feedback.
YWCA Bellingham	Non-profit service provider	Email and Survey	Feedback.
Catholic Community Services	Non-profit service developer	Email and Survey	Feedback.
Mercy Housing Northwest	Non-profit service provider	Email and Survey	Feedback.

Bellingham /Whatcom County Housing Authority	Non-profit service provider	Email and Survey	Feedback.
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Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public comment period: start date - 3/31/2022 end date - 4/18/2022***
- ***Public hearing: 4/14/2022***

The public participation process was initiated by the release of a public survey on 3/4/22. The intention of this survey was to solicit feedback on where and how the City should allocate its HOME-ARP funding award, and was distributed to at least 135 members of the public, including staff representatives for various non-profit housing developers, non-profit service providers, the housing authority, other governmental agencies, and other community organizations.

Survey responses were catalogued and utilized to inform the City’s draft allocation plan. The draft plan was then published to the City website on 3/31/22 for a period of 15 calendar days (upon which members of the public were invited to submit public comments on the draft plan). An announcement was made in the Bellingham Herald announcing to the public the release of

the draft allocation plan on the City of Bellingham website, and inviting members of the public to attend a public hearing on the draft plan and submit comments.

On 4/14/22, a public hearing was held to solicit public comment on the draft allocation plan, as published on the City of Bellingham website. This public hearing was held at the Community Development Advisory Board Meeting at 6:00pm.

The public participation process soliciting comment on the draft allocation plan was closed on 4/18/22.

Describe any efforts to broaden public participation:

In order to solicit public comments to inform the drafting of the HOME-ARP allocation plan, a survey was created and distributed to community organizations soliciting their feedback on where the HOME-ARP funding should be allocated, and what target populations should be prioritized with this funding.

Upon outreach to members of the public soliciting their feedback in this survey, it was made clear that accommodations would be made to members of the public who needed accommodations or translation services in order to complete the survey.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

The responses received by the public via the initial public survey varied across a variety of outcomes desired and populations that were recommended to be targeted. Members of the public were asked specifically how they believe the HOME-ARP funding should be allocated. Some examples of public comment received on this topic are:

“Emergency shelter, permanent supported housing, and permanent housing that is NOT housing first for our more vulnerable people who would not thrive in the housing first model.”

“Acquisition and Development of non-congregate shelter for families with children experiencing homelessness; supportive services inclusive of case management; TBRA; youth-specific shelter.”

“AFFORDABLE rental housing development (emphasis on affordable). There is a shortage of rentals that are available, and what is available is out of reach/unrealistic for the target population.”

Additional comments outlined a desire from the public to see the HOME-ARP funding support affordable housing development, noncongregate shelter facilities, supportive services, tenant-based rental assistance, permanent supportive housing, and mental health resources.

Members of the public had a variety of opinions on which populations should be supported by HOME-ARP funding. Some examples of comments received by the public regarding which populations should be targeted with this funding:

“Vulnerable families and single people experiencing homelessness, because they are at the highest risk. They need case management and support to ensure the reasons leading up to becoming homeless are addressed. Serving families with children is an opportunity to intervene and reduce risk to child development. Homeless youth also need shelter resources with supportive services. Chronically homeless singles are also vulnerable, in terms of risk of death and serious health problems.”

“Children. anyone who has children. because the trauma children face through homelessness leads to generational cycles and constant crisis intervention.”

“People at-risk or experience homelessness; this subgroup will naturally include people fleeing DV and veterans, while capturing all others not in those categories.”

Additional populations the community identified as should be prioritized with this funding are individuals who identify as queer, single adults, veterans, and people of color, youth and young adults, transgender and gender-nonconforming individuals, and individuals fleeing domestic violence.

Additional comments will be added at the close of the comment period.

Summarize any comments or recommendations not accepted and state the reasons why:

No comments received by the public were not accepted by the City.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	256	#	375	#	0								
Transitional Housing	210	#	43	#	0								
Permanent Supportive Housing	108	#	366	#	0								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						91	341	23	#				
Unsheltered Homeless						5	188	14	#				
Current Gap										#	#	#	#

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	32,295		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	330		
Rental Units Affordable to HH at 50% AMI (Other Populations)	418		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,115	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,010	
Current Gaps			3,200

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Please note that the tables above (Homeless Needs Inventory and Gaps Analysis Table and the Housing Needs Inventory and Gaps Analysis Table) were population using the following data sources:

- Point in Time Count (PIT) data
- Continuum of Care Housing Inventory Count (HIC) data
- Comprehensive Housing Affordability Strategy (CHAS) data
- City analysis of it's own records

1a. Homeless -

The most recent Whatcom County Point in Time Count (2021) identified 859 individuals experiencing homelessness. These 859 persons comprised 625 households. Of the 625 homeless households counted, 513 (82%) were unaccompanied persons. There were 16 (3%) family households with more than one person but without children. Families with children accounted for 96 households (15% of total households). Of the households with children, 65 were single-parent families and 31 families had both parents present. In addition, four households comprised of unaccompanied minors were counted in 2021.

Homeless persons were pretty evenly divided across gender (males 53%, females 42%, and gender nonconforming < 1%), and represented a wide range of ages (with the median age being 36 years). Children under 10 years old accounted for 14% of all identified individuals, and another 8% were between 10 and 17 years old. Together, children under the age of 18 accounted for more than one in five of all individuals counted.

The 2021 Point in Time count surveys show that only 60% of the respondents experiencing homelessness told surveyors that they identify as white and non-Hispanic, even though this demographic makes up more than 80% of the county's population. A relatively high proportion of individuals identifying as American Indian or Alaskan Native (9%), individuals identifying as Hispanic/Latino (11%), and individuals identifying as Black or African American (5%) experience homelessness in our community. Of the 859 persons counted this year, 641 slept in shelters or transitional housing facilities, and the other 218 were unsheltered.

Seniors – The most recent Point in Time identified that of the 859 homeless persons in Whatcom County, approximately 43 individuals were 65 years of age and older. Anecdotal, homeless outreach providers in the community have expressed that seniors comprise the second fastest growing subpopulation of individuals entering into homelessness.

1b. At-risk of homelessness -

Nearly 6,115 renter households in Whatcom County have a household income of 30% of the area median income or below and currently have 1 or more housing problems, as defined by HUD (including cost burden). Of these households, 75% identify as White, 2% identify as Black or

African American, 4% identify as Asian American, 3.5% identify as American Indian or Alaskan Native, and 10% identify as Hispanic (any race).

Seniors – Of the 6,115 renter households in Whatcom County with a household income of less than or equal to 30% of the area median income who purport to have at least 1 housing problem (including cost burden), 155 of these households are classified as an elderly non-family (meaning that there are 2 persons in the household and either one or both are age 62 or older). Of these 6,115 households at-risk of homelessness, 1,005 households are classified as an elderly non-family (meaning that these households are comprised of 1 or 2 persons and are non-family households with either person in the household person 62 years of age or older). Taking these two data points together, we assume that there are 1,160 households in Bellingham at-risk of homelessness with a senior present in the household.

1c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking -

Survivors of domestic violence continue to need supports in the City of Bellingham. The last Consolidated Plan indicated 2,509 unique individuals received supportive services from the community's local domestic violence support network, the Domestic Violence and Sexual Assault Services (DVSAS).

1d. "Other" as defined in Section 7 below

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data, there are a little over 1500 households in renter-occupied housing making less than or equal to 50% of the area median income, with a child under the age of 6 years old present in the home.

Veterans and Families that include a Veteran Family Member –

There are roughly 14,360 veterans in Whatcom County, according to the most recent US Census.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

2a. Homeless –

On the services and emergency housing intervention side, there is an unmet need in the form of drop-in shelters specifically serving families with children. In the community at present there are only drop-in shelters catering to single adults and adult families. The largest drop-in shelter in the community is a congregate facility containing 200 beds, which is not an appropriate physical layout for serving homeless families with children, or seniors who have higher vulnerabilities.

An additional complication, explained further in section 2b., is the lack of availability of affordable housing to those making less than 30% of the area median income. The lack of affordable housing stock creates complications on the services and rapid re-housing side. Anecdotal, services providers report that it is difficult to find available affordable housing to move the homeless households they case manage into. This results in households languishing in emergency shelter for a longer period of time, and creates a logjam of households waiting to enter into interim housing options.

2b. At-risk of homelessness –

The most recent Consolidated Plan for the City of Bellingham identified a significant lack of access to affordable housing for households making less than 30% of the area median income. These households have the most severe rates of cost burden in the community, and are the most vulnerable to housing costs. Inversely, the amount of housing stock available to those making less than 30% AMI is scarce; The vacancy rate for rental housing in Bellingham sits at 3%, and is even lower for more affordable rental housing units.

The diversion resources for households at-risk of homelessness are scant in this community. These resources are further outlined in Section 3b.

2c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking –

Currently there are resources in place to provide both emergency shelter and interim housing to survivor's of domestic violence, discussed more in Section 3c. However, as noted above in Section 2a., the lack of available affordable housing in the community to those making less than or equal to 30% of the area median income complicates efforts to rehouse survivors of domestic violence, and help these households move out of the shelter system and into permanent housing.

2d. "Other" as defined in Section 7 below –

Families with children present in the home, where the head of households is making less than or equal to 50% of the area median income are a population that were of special note in the most recent Consolidated Plan published by the City of Bellingham. The plan notes:

"Families with young children, and especially single-parent families, are particularly at risk of being priced out of Bellingham. Many struggle to find adequate housing and affordable childcare within the city and in close proximity to jobs and schools. Single-parent families are especially vulnerable to increasing housing costs: 51% are below the Federal poverty level."

Unfortunately, the same sentiment is true five years on; there is still a lack of access to affordable housing available for families making less than 50% of the area median income (see note in section 2b.), and a general lack of supportive services for families who are cost-burdened, as well as a lack of access to affordable childcare. The June 2021 [Whatcom County Child Care Demand Study](#) (by CEBR at WWU, commissioned by United Way of Whatcom County) projects a gap in available child care for children aged 0-5 of 5,817 slots.

An additional unmet housing need is shelter or other housing options specifically catering to veterans experiencing homelessness. There are a number of tenant-based resources for veterans seeking affordable housing (including VASH vouchers, etc.) but there are no shelter beds, interim housing facilities, or permanent housing specifically addressing the housing needs of veterans, though veterans are served through the available beds and units for adults in general.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

3a. Homeless –

Currently a number of supports across a variety of interventions exist for populations experiencing homelessness. Emergency drop-in shelter options are available for single adults experiencing homelessness at both Base Camp (200 beds) and the Northwest Youth Services Young Adult Winter Shelter (10 beds). Additionally, DVSAS runs 38 units across two shelters for survivors fleeing domestic violence, and NWYS runs the PAD shelter for youth between the ages of 13 and 17 years of age.

A variety of interim housing options are available for both single adults, adult families, and families with children, as well as specific interim housing tailored to specific populations. Here is a broad breakdown of the interim housing offered in our community to homeless households:

- Swifthaven and Unity Village tiny home villages operated by HomesNow offering 45 total interim housing beds in microunit domiciles across two villages
- Gardenvue tiny home village operated by Low Income Housing Institute and Road2Home offering 29 total interim housing beds in microunits
- Lighthouse Mission Ministries' Agape program offering 8 units of interim housing specifically for women and women with children
- Lighthouse Mission Ministries' Ascent program, offering 43 beds of interim housing specifically for adult men in recovery from SUDS
- Lydia Place's Gladstone campus, offering 5 units of interim housing specifically for women with children
- NWYS's Husly Shelter offers 4 units of interim housing for young adults between 18 and 24 years of age
- Sun Community Services' offers 9 units of interim housing for adults with mental illness and a history of institutionalization at its Sun House project
- The YWCA offers 41 beds of transitional housing specifically to women across three programs

3b. At-risk of homelessness –

A scant number of resources exist specifically targeted to populations' who are at-risk of homelessness. The Opportunity Council offers limited financial assistance for rent and utilities to

households at risk of homelessness. Additionally, two organizations in the community (LAW Advocates and Northwest Justice Project) offer free legal representation of tenants facing eviction. Finally the Whatcom Dispute Resolution Center (WDRC) provides impartial case management, conciliation, and mediation for tenants and landlords in eviction situations.

3c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking -

Currently the primary resource that exists in our community to serve the needs of victims fleeing domestic violence is the organization Domestic Violence and Sexual Assault Services (DVSAS), which provides safe emergency shelter, advocacy counseling, legal assistance, referrals, and a 24-hour helpline for victims of domestic violence. In addition, the Whatcom County Commission Against Domestic Violence provides outreach, awareness building, and trainings to the community.

At last count (the most recent Consolidated Plan published by the City) there are 166 beds in the city available to victims of domestic violence. Not all of these beds are exclusively designated for those fleeing domestic violence. Some are available for women and children who are facing homelessness for other reasons, and often have domestic violence in their backgrounds.

3d. “Other” as defined in Section 7 below

Currently, “other populations” as defined in Section 7 (Families with children present in the home, where the head of households is making less than or equal to 50% of the area median income) are served through resources as outlined in Section 3b. above.

Veterans and Families that include a Veteran Family Member –

There are a number of resources available to support and subsidize housing specifically for veterans, including SSVS, VASH, and VA Subsidized Housing. It should be noted, however, that these resources are tied to the veteran, and are all tenant-based resources. No veteran-specific project exists in Whatcom County, developed specifically to cater to the needs of veterans experiencing homelessness.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

A largest gap in the current shelter bed and shelter unit inventory in our community is a shelter(s) that caters to the emergency shelter needs of families with children. As illustrated above, right now there are no permanent programs that offer an emergency shelter option for families with children experiencing homelessness. This need is currently met with emergency motel room placements.

An additional need within the current shelter and housing inventory is more robust diversion resources. Currently only a few resources are available to households at risk of homelessness.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

The HOME-ARP notice defines “other populations” as populations who do not meet the criteria as established in the previous populations (homeless individuals, individuals at-risk of homelessness, individuals fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking) as such:

(1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

For the purposes of this allocation plan, this PJ will consider “other populations” households at greatest risk of housing instability (meaning households in the community making less than or equal to 50% AMI and still rent burdened). Additionally, for the purposes of this allocation plan, “other populations” will include the presence of a child(ren) in the home.

Identify priority needs for qualifying populations:

A chief need for individuals experiencing homelessness is continued access to supportive services and case management which will ensure individual success with the transition out of interim housing and into permanent housing.

By bolstering supportive services and case management in the PJ, the effect is twofold; first, this will help solve the logjam of households who are stuck in shelters and interim housing, and help facilitate placements of these households into permanent housing. Secondly, this support will help households find stability in permanent housing, and decrease the likelihood of these households returning to homelessness.

These services are often coupled with Tenant Based Rental Assistance to reduce any cost burden and make housing more accessible to households in need. As demonstrated elsewhere in this report, there is a lack of affordable housing available, and rent supports are necessary when a unit is found to be a housing solution for an otherwise homeless or at-risk-of-homeless household.

In addition to the services associated that are articulated herein, the actual place to sleep is also a priority need, which includes a shelter, interim housing facility, or permanent housing unit.

In summary, the priority needs are:

- Noncongregate shelter
- Tenant Based Rental Assistance (TBRA)
- Housing case management and diversion services
- Interim and/or permanent housing

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

In order to outline the level of need and gaps in the City’s shelter, a full inventory of the community’s shelter beds was taken. From there, an analysis was conducted to identify any speciality populations who were left unserved/underserved by the current shelter inventory.

The level of need and gaps in the housing inventory was determined by examining the current housing stock in the community and conducting an analysis of the housing offered. Metrics looked at included affordability, vacancy rate, and size/bedroom count. This was then examined

across the number of households at different income brackets and at different sizes to identify the need in the community for affordable housing.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

Applications for funding for HOME-ARP projects will follow the standard City of Bellingham allocation process. This process entails the solicitation of applications for funding through a Notice of Funding Availability. The applications must include information on the specific project details, including notes on the project size, populations that will be served by the project, and an outline of funding needed to support the development and/or ongoing operational needs of the project.

Upon receipt of the application, the City will consider all applications and seeks public feedback via the standing Community Development Advisory Board meetings, held monthly. Projects who qualify under application guidelines will be considered for HOME-ARP funding.

The PJ will not administer eligible activities directly. Direct services development activities associated with housing services and/or noncongregate shelter or housing development will be assumed by subrecipients awarded HOME-ARP funding by the PJ.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

No portion of the PJ's HOME-ARP administrative funds were awarded to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		

Acquisition and Development of Non-Congregate Shelters	\$ 2,000,000		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 184,701	8 %	15%
Total HOME ARP Allocation	\$ 2,184,701		

Additional narrative, if applicable:

The City has other funding available to address the priority needs of the qualifying populations, and in addition to the information outlined in this plan, will consider constraints and requirements associated with funding sources to target the specific source with the appropriate use. The City will take efficiency, administrative burden, and other similar factors into consideration when determining where to use the HOME-ARP funding when other funding sources are also available to address the needs.

To that end, while the uses are proposed herein, the following are proposed as contingency uses: Tenant Based Rental Assistance (TBRA), Supportive Services, and Development of Affordable Rental Housing. These contingencies will be considered if the HUD HOME-ARP funding is adjusted, if planned activities do not go forward, if agencies are not able to respond to or implement the activities, or if funding amounts or sources for listed projects are modified, all in accordance with the Community Participation Plan. These changes based on contingencies are not considered substantial amendments.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

All of the forgoing information clearly targets the activities suggested in the funding plan, especially to the degree these activities prioritize populations with the largest gap in housing and services, such as households with children present, seniors, or veterans.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

If HOME-ARP funds are utilized to support the development of affordable rental housing units, up to 12 affordable rental units for qualifying populations may be produced. This outcome was determined by dividing the HOME-ARP allocation for the PJ (nearly \$2mm in funds) by the

maximum subsidy per unit (\$153,314 for 0 bedroom unit, \$175,752 for a 1 bedroom unit, \$213,717 for a 2 bedroom unit, \$276,482 for a 3 bedroom unit, and \$303,489 for a 4+ bedroom unit).

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

No specific goal has been outlined to compel the production of affordable rental housing. Rental housing production is listed as a contingency project.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The City may give preference to populations with the most significant gaps in services, shelter or housing, such as households with children present, seniors, or veterans.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The reason for the preference consideration is due to the clear gap present for these populations.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

The City will continue supporting the existing services in the community for all qualifying populations with other funding sources, and will target the HOME-ARP funds to the areas where there is a gap, the funds are appropriate to utilize, and there is an agency who is interested in addressing the need and implementing the program(s) or project(s) in the community.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-

ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

This jurisdiction does not intend to use HOME-ARP funding to refinance existing debt secured by multifamily rental housing.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

N/A

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

N/A

- ***Other requirements in the PJ's guidelines, if applicable:***

N/A



2022 Action Plan

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

a component of the
2018 – 2022 CONSOLIDATED PLAN

City of Bellingham

Washington

DRAFT: April 7, 2022

Executive Summary

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

1. Introduction

The City of Bellingham approved the 2018-2022 Consolidated Plan on May 17, 2018 (Resolution No. 2018-07). Since its adoption, the following has occurred:

- On July 20, 2018, the U.S. Department of Housing and Urban Development (HUD) approved the Consolidated Plan and 2018 Action Plan.
- On May 6, 2019, the 2019 Action Plan was approved by the City Council (Resolution No. 2019-14).
- On June 8, 2020, the 2020 Action Plan was approved by the City Council (Resolution No. 2020-13); this plan was modified and an amended Action Plan submitted to HUD following a public hearing at the December 10, 2020, Community Development Advisory Board meeting.
- On May 7, 2021, the 2021 Action Plan was approved by the City Council (Resolution No. 2021-10).

2022 is the fifth and final Action Plan year under the 2018-2022 Consolidated Plan. New activities selected for funding in the Plan are based on solicitation of proposals. Funding sources for these activities include federal HUD HOME and CDBG funds, as well as local City funds (Housing Levy, Affordable Housing Sales Tax, Real Estate Excise Tax, and General Fund). Due to the COVID-19 pandemic, special HUD allocations and federal State and Local Fiscal Recovery Funds (SLFRF) through the American Rescue Plan Act (ARPA) are also included. Specifically, the City sought applications for the following:

- **Rental Housing Development** – released on December 6, 2021, with applications due by January 24, 2022. No applications were received.
- **Housing Preservation and Shelter** – released on December 6, 2021, with applications due by January 24, 2022. No applications were received.
- **Community Facilities and Improvements** – December 6, 2021, with applications due by January 24, 2022. Five applications were received.

Several existing commitments from previous years are carried forward, including the homebuyer assistance program, tenant based rental assistance, preservation and rehabilitation projects, rental housing development projects, housing and services programs, and a safe tiny house encampment for the unsheltered.

2. Summarize the objectives and outcomes identified in the Plan

The City continues to prioritize housing development, homebuyer support, community facilities and housing and human services.

New Project Funding:

- One interim housing construction/development project would add to the City's housing inventory: an 25-30 unit non-congregate shelter facility for unhoused families with children.

- One Community Facility and Improvement childcare facility would be supported with funds for tenant improvements.
- Two Community Facility and Improvement childcare facilities would be supported with funds for acquisition.
- Funds would be set aside for urgent housing preservation needs.
- Housing Services funding would be allocated to seven agencies, all of which currently provide housing services to households in need through housing case management, diversion from homelessness, or other housing-related services for vulnerable households.
- Human and Social services funding would be allocated to 20 agencies continuing the intended 2-year commitment, addressing basic needs, affordable childcare, services to those with physical or cognitive impairment, or other services that reduce vulnerability to homelessness.

Carryover and Continuing Projects: Activities funded prior to 2022, or ongoing programs, are adjusted for remaining amounts anticipated to be spent in 2022-23 and/or adjustments in funding sources. These activities include: the homebuyer down payment assistance program, homeownership development (KulshanCLT, Telegraph Rd project phase 1b); five housing production projects (Bellingham Housing Authority, Samish Way Redevelopment phases 1 and 2; Mercy Housing NW, Barkley Family Housing and Millworks Family Housing; and Opportunity Council, Laurel & Forrest Senior Housing); general public facilities, housing preservation activities (manufactured home repair, emergency repair, and City owner-occupied rehabilitation program), and rental assistance and supportive services (Tenant Based Rental Assistance, housing services programs, human & social services programs). Ongoing programs in the rental assistance and supportive services program that are levy-funded include the Homeless Outreach Team, Homeless Service Center, and project-based housing assistance.

Contingency Projects: In the event that appropriations are greater or less than anticipated, or planned activities are cancelled, the following activities are proposed as contingencies: Tenant Based Rental Assistance (HOME), Housing Rehabilitation (CDBG), Housing Finance Commission Homebuyer (HOME), and Community & Public Facilities (CDBG), as well as modified funding amounts or sources for listed projects, in accordance with the Community Participation Plan.

3. Evaluation of past performance

This Action Plan is for the fourth year of the 2018-2022 Consolidated Plan. The City has completed three performance evaluation reports under the Consolidated Plan, the most recent reporting on the July 1, 2020 – June 30, 2021 Action Planning year. This performance report showed progress toward goals as follows:

- The goal of ‘Increase affordable housing supply for rental and interim housing’ showed thirty-seven percent progress;
- The goal of ‘Rehabilitation of existing units’ showed seventy-five percent progress;
- The goal of ‘Increase affordable housing supply for homeownership’ showed forty-seven percent progress;
- The goal of ‘Promote neighborhood equity’ showed twenty percent progress; and
- The goal of ‘Address and prevent homelessness’ showed one hundred and fifty-four percent progress.

4. Summary of Citizen Participation Process and consultation process

The public consultation process for the 2022 Action Plan included a 30-day public comment period,

and a public hearing before the Community Development Advisory Board (on March 10, 2022). The public was invited to comment on the Action Plan during the written comment period, which was held from February 22 – March 25, 2021.

The display ad providing notice of the public hearing and plan amendment was published in Bellingham Herald on February 23, 2022. All public participation and consultation was done in accordance with the City's Community Participation Plan that was adopted as part of the 2018 Consolidated Plan development process, and modified in early 2020.

5. Summary of public comments

No members of the public spoke at the public hearing or submitted written comments.

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

The Community Development Advisory Board reviewed the draft plan at their March 10 and April 14 meetings prior to making recommendations. No views were not accepted.

7. Summary

The 2022 Action Plan is intended to implement the priorities and strategies set forth in the 2018-2022 Consolidated Plan.

Lead & Responsible Agencies

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

The following describes the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	BELLINGHAM	
CDBG Administrator	BELLINGHAM	Planning and Community Development
HOPWA Administrator	N/A	
HOME Administrator	BELLINGHAM	Planning and Community Development
HOPWA-C Administrator	N/A	

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information:

Samya Lutz, Housing & Services Program Manager
Planning and Community Development Department
City of Bellingham
210 Lottie Street - Bellingham, WA 98225

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

Consultation

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

The City of Bellingham works in partnership with other agencies, nonprofit organizations, the public housing authority and other citizens and stakeholders to identify the needs for affordable housing, community development and homelessness. These needs are documented in the 2018-2022 Consolidated Plan. Based on these needs, the Consolidated Plan consultation process included setting priorities based on the financial resources available through HUD and local sources.

The consultation process for an Annual Action Plan is to align resources with the goals and strategies outlined in the Consolidated Plan. The City provided an opportunity for agencies and nonprofits to submit proposals for funding assistance that would work to implement the goals and strategies of the 2018-2022 Consolidated Plan. The process to accept proposals resulted in numerous activities.

Funding requests exceeded the amount of anticipated resources in most categories. Where additional resources are available, it is within the City's local resources: Housing Levy, Affordable Housing Sales Tax, Real Estate Excise Tax, and locally-controlled SLFRF-ARPA dollars. CDBG and HOME grants, including the special COVID allocations and program income, are fully allocated in the 2022 Action Plan.

Including the listed agencies that were consulted, 151 individuals from 85 agencies were contacted to provide them with an opportunity to know that applications for funding assistance to implement the 2018-2022 Consolidated Plan were being accepted.

Enhancing Coordination

(91.215(l))

The public and assisted housing providers, as well as governmental health, mental health and service agencies, have close working relationships in Bellingham and Whatcom County. The Whatcom County Health Department is the lead agency for homeless housing, as well as public health, mental health and veteran's needs in our community. Coordination has been more challenging during the COVID-19 epidemic, due to the need for remote-only meetings. That said, all groups and committees have continued their work utilizing remote meeting platforms. The City is an active member of the Whatcom County Housing Advisory Committee and Whatcom County's Community Health Improvement Plan workgroup. The City also sits on the steering committee of the Whatcom Housing Alliance, a multi-sector group that advocates for equitable housing policies. The City's Community Development Advisory Board includes membership that represents ward areas throughout the City, and housing and social service providers, including a representative from the public housing authority.

Continuum of Care

Whatcom County is the lead agency for the Continuum of Care and the Plan to End Homelessness. The Whatcom Homeless Service Center is the coordinating entity for homelessness, including a single point of entry. The City has incorporated the goals, strategies, activities and outcomes for addressing homelessness in our community into the plan, ensuring consistency in policies and efforts.

The City participates actively in the local Coalition to End Homelessness, including the Steering Committee for this group, which strives to actively engage people who have or are experiencing homelessness, identify their needs, and respond accordingly, and has the primary goal of implementing the county's Local Plan to Address Homelessness, "A Home for Everyone."

The City has coordinated with Whatcom County and has incorporated their goals, strategies, activities

and outcomes in the Consolidated Plan. The City helps fund the Whatcom Homeless Service Center, which administers the Homeless Management Intake System (HMIS) for the community. City staff meet regularly with County staff and staff from the Whatcom Homeless Services Center (WHSC), as well as other partner agencies who participate in taking WHSC and Coordinated Entry referrals. The City and County strive to align their performance standards and expectations as much as possible and are in regular communication about funding allocations and changes over time. The City has a seat on the Whatcom County Housing Advisory Committee, which makes recommendations on County funding allocations.

Participating agencies, groups, organizations and others

Including the listed agencies that were consulted, 85 agencies and organizations were contacted to provide them with an advance opportunity to know that applications were being accepted for funding assistance to implement the 2018-2022 Consolidated Plan. In addition, discussion about the 2022 Action Plan process was included at Whatcom Coalition to End Homelessness steering committee meetings, and at the Whatcom County Housing Advisory Committee meetings, both of which include representatives from many local housing-related agencies as well as public representatives. The City also continues to follow its Community Participation Plan; specifically, the elements relevant to Action Plan development or modifications.

1	Agency/Group/Organization	BELLINGHAM HOUSING AUTHORITY
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Executive Director of the Bellingham Housing Authority is a member of the city's Advisory Board which recommends priorities and funding of the Action Plan.

2	Agency/Group/Organization	OPPORTUNITY COUNCIL
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy CHDO-eligible Activities
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Opportunity Council was consulted and participated in development of the action items. In addition, because the Homeless Service Center is hosted by the Opportunity Council, strategies regarding homelessness were coordinated with them.

Table 2 – Agencies, groups, organizations who participated

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Whatcom County	Whatcom County drafted the Homelessness Strategy, and reviewed and commented on the Consolidated Plan. They also developed and continue to update the Countywide Health Improvement Plan. Whatcom County and City staff frequently assist one another in coordinated review of agency funding and activities.

Table 1 – Other local / regional / federal planning efforts

Participation

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process

A public display ad for this Action Plan was published in the Bellingham Herald on Wednesday, February 23, 2022 notifying the public of an opportunity to comment on the Action Plan and attend a public hearing. Notices were also sent out to stakeholders and the media and posted on the city's web site. The public hearing was held on March 10, and the public comment period was open through March 25. In addition, multiple Notices of Funding Availability (NOFAs) were published in December and distributed broadly, as discussed elsewhere in this plan. Responses to these NOFAs were what primarily impacted the goal setting.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing & comment period	Non-targeted/broad community	Held with advisory board members – no public in attendance	No general public comments received	N/A	
2	Newspaper Ad	Non-targeted/broad community	Display ad - no direct response requested	Display ad - no direct response requested	Display ad - no direct response requested	

Table 4 – Citizen Participation Outreach

Expected Resources

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

HUD's 2022 allocation to the City of Bellingham were not released at the time of the draft Action Plan publication for public comment. Anticipated resources were based on prior year allocations; any necessary adjustments will be made in accordance with the contingency funding plan and the Community Participation Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available				Expected Amount Avail Remainder of ConPlan (\$)	Narrative Description
			Annual Allocation: (\$)	Program Income: (\$)	Prior Year Resources: (\$)	Total: (\$)		
CDBG	Public - Federal	Acquisition Admin and Planning Housing Public Improvements Public Services	\$840,208	\$710,000	\$256,078	\$1,806,286	\$0	Funds used for priority needs, including preservation of housing stock, lead-based paint, public improvements, public services and administration and planning.
CDBG-CV	Public – Federal	Public Services			\$412,564	\$412,564	\$0	Funds used for responding to the impacts of the coronavirus pandemic.
HOME	Public - Federal	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Multifamily rental new construction TBRA	\$602,793	\$120,000	\$150,717	\$873,510	\$0	Funds used for homebuyer assistance, tenant-based rental assistance, housing development (including CHDOs) and administration.
HOME-ARP	Public-Federal	Admin and Planning Multifamily rental new construction Non-congregate shelter Public Services TBRA			\$2,184,701	\$2,184,701	\$0	Funds used for responding to the impacts of the coronavirus pandemic on qualifying populations.

Program	Source of Funds	Uses of Funds	Expected Amount Available				Expected Amount Avail Remainder of ConPlan (\$)	Narrative Description
			Annual Allocation: (\$)	Program Income: (\$)	Prior Year Resources: (\$)	Total: (\$)		
Other	Public - Local	Acquisition Admin and Planning Homebuyer assistance Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership Public Services TBRA	\$7,000,000		\$6,320,822	\$13,320,822	\$0	The City of Bellingham has a voter-approved housing levy and an affordable housing sales tax that support development and preservation of housing, as well as rental assistance and housing services. Local COVID relief funds are here as well.
Other	Public - Local	Public Services TBRA Childcare improvements Public improvements	\$583,100		\$628,862	\$1,211,962	\$0	This is the city's investment in housing, human and social services. It is predominantly city general fund dollars, but also includes some of the city's Real Estate Excise Tax.

Table 5 - Expected Resources – Priority Table

Federal Funds / Additional Resources

On average, for every dollar of federal funds the City expended on activities that were completed, the City leverages over \$12 of non-federal funds. In particular, rental housing development and human (public) service funding leverage considerable funding from non-federal sources, tapping into the local commitment of nonprofit agencies delivering critical housing and services to our community.

Discussion

Bellingham voters approved a Housing Levy renewal in 2018, assessing \$4 million per year to address housing development/preservation and housing services. Bellingham City Council approved a sales tax in 2021, bringing in an additional \$3 million (estimated) per year to address housing development and services. These funds are used to help support capital costs, rent and services, thus contributing to the federal matching requirements. The needs, priorities and strategies of the Consolidated Plan are assisted by these additional resources in the community, and aligned with the priorities of the local housing funds.

Annual Goals and Objectives

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

Goals Summary Information

The following table is a summary of the 2020 goals.

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase affordable housing rental supply	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs	MORE AFFORDABLE RENTAL HOUSING	HOME Local	Rental Units Constructed
2	Address and prevent homelessness	2018	2022	Affordable Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	ADEQUATE RESPONSE TO HOMELESS CRISIS	CDBG HOME Local	Public service activities other than Low/Moderate Income Housing Benefit Public service activities for Low/Moderate Income Housing Benefit Tenant-based rental assistance / Rapid Rehousing
3	Preserve existing housing	2018	2022	Affordable Housing Non-Homeless Special Needs	REHABILITATION OF EXISTING UNITS	CDBG Local	Rental units rehabilitated Homeowner housing rehabilitated
4	Increase affordable homeowner housing supply	2018	2022	Affordable Housing	MORE MODERATE INCOME RESIDENTS AS HOMEOWNERS	HOME Local	Direct Financial Assistance to Homebuyers Homeowner Housing Added

Sort Order	Goal Name	Start Year	End Year	Category	Needs Addressed	Funding	Goal Outcome Indicator
5	Promote neighborhood equity	2018	2022	Non-Homeless Special Needs Non-Housing Community Development	EQUITY AND ECONOMIC MOBILITY	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit
6	Coordinate and improve delivery of services	2018	2022	Other	EDUCATION AND OUTREACH ON HOUSING ISSUES	CDBG HOME Local	Other (Administrative and coordination functions, as well as education and technical assistance to agencies.)

Goal Descriptions

1	Goal Name	Increase affordable housing rental supply
	Goal Description	The private market is unable to meet the demand for affordable housing units without assistance. The rise in housing costs, together with historically low vacancy rates and sluggish wage growth, makes it very difficult to find affordable housing. This need is the result of several contributing factors: lack of affordable, accessible housing in a range of unit sizes; low vacancy rate; and displacement of residents due to economic pressures.
2	Goal Name	Address and prevent homelessness
	Goal Description	Support low barrier shelter, rental assistance, and case management and diversion programs, as well as basic needs and assistance to very low income households. One of the contributing factors to this problem is lack of assistance for transitioning from institutional settings to integrated housing.
3	Goal Name	Preserve existing housing
	Goal Description	Rehabilitate owner-occupied and rental housing for low-income residents. The contributing factors this goal addresses are: displacement of residents due to economic pressures; and lack of assistance for housing accessibility modifications.

4	Goal Name	Increase affordable homeowner housing supply
	Goal Description	Support down-payment assistance and new homeownership opportunities. The contributing factor this addresses are: impediments to (economic) mobility and displacement of residents due to economic pressures. This goal is implemented through the City's homebuyer program administered by the Housing Finance Commission and support for new homeownership development.
5	Goal Name	Promote neighborhood equity
	Goal Description	Improve infrastructure and connectivity, equity of affordable housing distribution, and investments in facilities in low-income neighborhoods. The contributing factors this goal addresses are: lack of investment in specific neighborhoods, including services or amenities; land use zoning laws; disparities in access to opportunity.
6	Goal Name	Coordinate and improve delivery of services
	Goal Description	This goal is about education and administration supports. This includes public education on Fair Housing and housing issues, disaster preparedness, outreach to funding decision makers and policy makers. The contributing factor this goal addresses is disproportionate housing needs.

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):

All new development of affordable housing is reflected in carry-over project applications that may reflect additional funding commitments. HOME funds will contribute to 5 units in the 77-unit Barkley Family Housing development. The City is supporting the development of a total of 317 affordable rental units and 4 affordable homeownership units that will be under construction in the 2022-2023 Action Plan year.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2022 Action Plan includes continuation of existing activities, renewal of ongoing activities, and new projects. The DRAFT (unbalanced) list is shown in the tables below.

2022 ACTION PLAN SUMMARY (Split into 2 tables – HUD & Local funding)

2022 ACTION PLAN SUMMARY - HUD					
RESOURCES ANTICIPATED	CDBG	CDBG-CV (incl state)	HOME	HOME-ARP	TOTAL
Grant/Allocation	852,590	-	602,793	-	1,455,383
Program Income (Loan Paybacks)	210,000	-	140,000	-	350,000
Prior Year Uncommitted/Deobligated Funds	-	-	-	2,184,701	2,184,701
EXISTING COMMITMENTS (AWARDS)	18,000	291,301	303,771	-	613,072
TOTAL:	\$ 1,080,590	\$ 291,301	\$ 1,046,564	\$ 2,184,701	\$ 4,603,156
ACTIVITIES	CDBG	CDBG-CV	HOME	HOME-ARP	TOTAL
Production Program					
Previous (Unspent) Commitments					
Lydia Place Hearthouse			-		-
Mercy HNW - Barkley Family Housing			179,581		179,581
Opportunity Council - Laurei & Forrest Senior Housing	-	-	-	-	-
Mercy HNW - Millworks Family Housing	-	-	-	-	-
BHA Samish Way Redevelopment - Phase 2	-	-	-	-	-
BHA Samish Way redevelopment - Phase 3	-	-	-	-	-
2022 Requests:					
FWC Interim Housing Facility				2,000,000	2,000,000
Barkley apartment preservation					-
Predevelopment assistance for new projects					-
Hold for rapid acquisition/preservation					-
CHDO Set Aside (min. 15% of HOME Grant)					
MHNW - Barkley Family Housing			90,419		90,419
Preservation & Shelter Program					
Previous Commitments					
2020 City Rehabilitation Program	15,000				15,000
2020 Manufactured Housing Repair					-
2022 Program:					
City Rehabilitation Program	520,000				520,000
Manufactured Housing Repair					-
2021 Emergency Repair					-
Acquisition and Opportunity Program					
Acquisition and Opportunity Fund					-
Rental Assistance and Supportive Services Program					
Carryover from Previous Commitments					
2021 FY Tenant Based Rental Assistance					-
2022 Program (includes Prior Commitments):					
Housing Project-Based Services	-	190,000	-		190,000
Homeless Service Center Admin	-	-	-		-
Homeless Outreach Team	-	-	-		-
GRACE	-	-	-		-
2022 FY Tenant Based Rental Assistance	-	-	194,800	-	194,800
Emergency Motel Stays	-	-	-		-
2022-23 NOFA Allocations:					
Housing Services	49,995	84,887	-	-	134,882
Human & Social Services	109,544	16,414	-	-	125,958
Hold for housing services					-
Community/Public Facility Program					
Previous (Unspent) Commitments					
BSD Fam Resource Center	3,000	-	-	-	3,000
BCEL repairs to meet licensing	-	-	-	-	-
Millworks Childcare	-	-	-	-	-
Barkley YMCA - TI in new building	-	-	-	-	-
LP Heart House Childcare	-	-	-	-	-
Samish Commons Childcare	-	-	-	-	-
2022 Requests:					
Boys & Girls Club Yew St Childcare acquisition					-
YMCA - Additional needed for TI in new building					-
Facilities - Acquisition/Development/repair	170,533				170,533
Homebuyer Program					
Previous Commitments					
Housing Finance Commission			1,771		1,771
KCLT Telegraph Rd, Ph 1-A&B			160,000		160,000
2021 Requests:					
WSHFC Continuing Allocation			345,714		345,714
Contingency Projects					
HOME - WSHFC, TBRA, Multifamily housing, CHDO operating					-
CDBG- Rehab program, Public Facilities, Services					-
Administration					
City Expenses	212,518		61,779	184,701	458,998
TBRA Administration (contract)			12,500		12,500
TOTAL:	\$1,080,590	\$291,301	\$1,046,564	\$2,184,701	\$4,603,156
BALANCE	\$ -	\$ -	\$ -	\$ -	\$ -

2022 ACTION PLAN SUMMARY - LOCAL						
RESOURCES ANTICIPATED	GENERAL FUND	REET	ARPA	AH SALES TAX	HOUSING LEVY	TOTAL
Grant/Allocation	491,085	320,000	3,021,926	1,947,319	1,114,410	6,894,740
Program Income (Loan Paybacks)	-	-				-
Prior Year Uncommitted/Deobligated Funds	-	-				-
EXISTING COMMITMENTS (AWARDS)	588,333		6,180,000	2,143,460	4,275,699	13,187,492
TOTAL:	\$ 1,079,418	\$ 320,000	\$ 9,201,926	\$ 4,090,779	\$ 5,390,109	\$ 20,082,232
ACTIVITIES	GENERAL FUND	REET	ARPA	AH SALES TAX	HOUSING LEVY	TOTAL
Production Program						
Previous (Unspent) Commitments						
Lydia Place Hearthouse					128,370	128,370
Mercy HNW - Barkley Family Housing					65,000	65,000
Opportunity Council - Laurel & Forrest Senior Housing	-	-		1,800,000	200,000	2,000,000
Mercy HNW - Millworks Family Housing	-		2,800,000	-	200,000	3,000,000
BHA Samish Way Redevelopment - Phase 2	-	-			2,025,000	2,025,000
BHA Samish Way redevelopment - Phase 3	-		1,375,000	-	528,500	1,903,500
2022 Requests:						
FWC Interim Housing Facility				1,000,000		1,000,000
Barkley apartment preservation			2,525,000			2,525,000
Predevelopment assistance for new projects					120,000	120,000
Hold for rapid acquisition/preservation		320,000				320,000
CHDO Set Aside (min. 15% of HOME Grant)						
MHNW - Barkley Family Housing						-
Preservation & Shelter Program						
Previous Commitments						
2020 City Rehabilitation Program						-
2020 Manufactured Housing Repair					40,000	40,000
2022 Program:						
City Rehabilitation Program						-
Manufactured Housing Repair					135,000	135,000
2021 Emergency Repair					50,000	50,000
Acquisition and Opportunity Program						
Acquisition and Opportunity Fund						-
Rental Assistance and Supportive Services Program						
Carryover from Previous Commitments						
2021 FY Tenant Based Rental Assistance		-			1,500	1,500
2022 Program (includes Prior Commitments):						
Housing Project-Based Services	65,370	-		268,000	408,261	741,631
Homeless Service Center Admin	46,860	-		-	33,640	80,500
Homeless Outreach Team	196,103	-		-	210,000	406,103
GRACE	280,000	-		-	-	280,000
2022 FY Tenant Based Rental Assistance	-	-		-	16,500	16,500
Emergency Motel Stays	50,000		100,000	175,000	-	325,000
2022-23 NOFA Allocations:						
Housing Services	-	-		607,779	634,410	1,242,189
Human & Social Services	441,085	-		-	-	441,085
Hold for housing services				-		-
Community/Public Facility Program						
Previous (Unspent) Commitments						
BSD Fam Resource Center	-	-		-	-	-
BCEL repairs to meet licensing	-	-		-	-	-
Millworks Childcare	-		1,000,000	-	-	1,000,000
LP Heart House Childcare	-		155,000	-	-	155,000
Samish Commons Childcare	-		750,000	-	-	750,000
2022 Requests:						
Boys & Girls Club Yew St Childcare acquisition			200,000			200,000
YMCA - TI in Barkley building			296,926			296,926
Homebuyer Program						
Previous Commitments						
Housing Finance Commission					73,928	73,928
KCLT Telegraph Rd, Ph 1-A&B					40,000	40,000
2021 Requests:						
WSHFC Continuing Allocation					240,000	240,000
Contingency Projects						
HOME - WSHFC, TBRA, Multifamily housing, CHDO operating						-
CDBG- Rehab program, Public Facilities, Services						-
Administration						
City Expenses				240,000	240,000	480,000
TBRA Administration (contract)						-
TOTAL:	\$1,079,418	\$320,000	\$9,201,926	\$4,090,779	\$5,390,109	\$20,082,232
BALANCE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

2022 ACTION PLAN RENTAL ASSISTANCE AND SERVICES – Details

	CDBG	CDBG-CV	HOME	HOME-ARP	CITY GENERAL FUND	CITY REET/ARPA	CITY 1590	CITY HOUSING LEVY	TOTAL
Existing Commitments:	-	291,301	-	-	588,333	100,000	75,460	653,401	\$ 1,708,495
New or Reprogrammed Revenue:									
Housing Services & Rent Assistance	49,995		194,800	-	-		532,319	650,910	\$ 1,428,024
Human and Social Services	109,544				441,085				\$ 550,629
Project-based Rent and Services							268,000		\$ 268,000
Emergency Shelter Services					50,000		175,000		\$ 225,000
TOTALS	\$ 159,539	\$ 291,301	\$ 194,800	\$ -	\$ 1,079,418	\$ 100,000	\$ 1,050,779	\$ 1,304,311	\$ 4,180,148
2022 PROGRAM									
PROGRAM	CDBG	CDBG-CV	HOME	HOME-ARP	CITY GENERAL FUND	CITY REET/ARPA	CITY 1590	CITY HOUSING LEVY	TOTAL
Rental Assistance									
Existing Commitments:									
2021 FY Tenant Based Rental Assistance								1,500	\$1,500
2022 Program:									
Tenant Based Rental Assistance Program			194,800					16,500	\$211,300
Housing Services									
Existing Commitments:									
Homeless Service Center Admin					46,860			33,640	\$80,500
Homeless Outreach Team					196,103			210,000	\$406,103
2022-23 Competitive:									
HSC - Housing Lab / Housing Navigator								54,000	\$54,000
Lydia Place - Family Services & Heart House	-	-	-	-	-	-	307,290	122,710	\$430,000
OC - Rapid Re-Housing & Diversion for Families & Seniors	-	84,887	-	-	-	-	300,489	263,000	\$648,376
NWYS Ground Floor day center for hmls youth								85,000	\$85,000
NWYS - Transitional Living Program								48,000	\$48,000
NWYS - PAD Program	49,995							-	\$49,995
DVSAS - Safe Shelter								29,700	\$29,700
YWCA - Larrabee Residence								32,000	\$32,000
Additional Housing Services									\$0
Held for Emergency Motel Stays					50,000	100,000	175,000		\$325,000
Project-Based Rental Assistance & Housing Services									
Existing Commitments:									
Francis Place Housing Services	-	-	-	-	-	-	-	178,000	\$178,000
Sun (Greggie's & Nevada) Housing Services	-	-	-	-	-	-	-	87,404	\$87,404
Opportunity Council / NWYS 22 North Housing Services	-	-	-	-	-	-	-	142,857	\$142,857
LIHI - Tiny House Village	-	190,000	-	-	65,370	-	268,000		\$523,370
Held for additional Housing & Project-based Services									\$0
Human & Social Services									
Existing Commitments:									
GRACE-LEAD					280,000				\$280,000
2022-23 Competitive:									
Lydia - Mental Health Counseling	21,534				49,359				\$70,893
BFB - Free Grocery Program	22,942				27,058				\$50,000
DVSAS - Safe Start Program					21,350				\$21,350
NWYS - Vocational Readiness Program					25,900				\$25,900
OC - Volunteer Chore Program					29,600				\$29,600
NWYS - Teen Court					24,300				\$24,300
WLC - Gaining Jobs & Improving Self-Sufficiency Through Literacy					15,000				\$15,000
BCFSC - Target Intensive Case Management					-				\$30,000
St Francis Foundation - Generations Tuition	30,000				15,000				\$15,000
WDRC - Parent / Teen Mediation					15,000				\$15,000
OC - Maple Alley Inn					28,000				\$28,000
WCOA - Meals on Wheels Bellingham	35,068				14,932				\$50,000
Rebound Roots					15,000				\$15,000
BCELC - Childcare & Early Learning Services					20,000				\$20,000
SHH - Residential Services for Adults Living with AIDS					15,000				\$15,000
MNW - Senior Support Services					15,000				\$15,000
BPS - Carl Cozier Family Resource Center		6,414			53,586				\$60,000
BGC - Kids' World Assistance		10,000			27,000				\$37,000
Max Higbee - Weekday Program					30,000				\$30,000
TOTAL ALLOCATIONS	\$159,539	\$291,301	\$194,800	\$0	\$1,079,418	\$100,000	\$1,050,779	\$1,304,311	\$4,180,148
BALANCE:	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Geographic Distribution

AP-50 Geographic Distribution – 91.220(f)

Funds are distributed throughout the City. The City does not have any target areas nor areas of minority concentration. Many projects are delivered city-wide or are in scattered locations. The Central Business District and urban village areas include land that is compatible with multi-family development with access to services.

Geographic Distribution

Target Area	Percentage of Funds
City of Bellingham	100

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City encourages equity in affordable housing and services throughout the geographic area. This includes diversifying urban village areas, investment of public facilities and improvements in low-income neighborhoods, adding new subsidized housing units in higher income neighborhoods, and acquiring existing ‘naturally occurring’ rental units in higher poverty neighborhoods.

Discussion

Program activities are not strictly limited to serving any areas but are instead designed to promote geographic equity of housing and services throughout the City.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Affordable housing support includes rental assistance, new rental construction, homebuyer program and housing services.

One Year Goals for the Number of Households to be Supported	
Homeless	608
Non-Homeless	566
Special-Needs	6
Total	1,180

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance and Services	1,123
The Production of New Units	26
Rehab of Existing Units	27
Acquisition of Existing Units	4
Total	1,180

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Leveraging local funds and federal dollars has helped create more opportunities for housing locally, yet there is still a vacancy rate hovering under 2%, high homeless population, more capacity needed in the local workforce, and severe need for additional affordable housing.

Public Housing

AP-60 Public Housing – 91.220(h)

The Bellingham Housing Authority provides public housing and affordable housing in Bellingham. The Housing Authority has been innovative in their pursuit of projects to meet the needs of the community.

Action to address Public Housing Needs

The City will continue to work with the Bellingham Housing Authority (BHA) to address their needs.

1. The City will continue to support the Bellingham Housing Authority's program to involve residents in the management of the Housing Authority and their property.
2. The City will involve public housing residents in future updates to Fair Housing plans and provide them with Fair Housing information.
3. The City will encourage the Housing Authority to provide information about homeownership opportunities to public housing residents.
4. The City continues to collaborate with the Housing Authority on the development of the Samish Way site which was sold by the City to the Housing Authority with flexible terms. Phase I's 69 units are now occupied, and phases II and III are in construction. The final two buildings will offer an additional 102 affordable housing units.

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

The City will continue to share educational information about the City's homeownership downpayment assistance program, and about Kulshan CLT's and Habitat for Humanity's homeownership programs.

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

N/A

Discussion

The City is fortunate to have a well-managed public housing authority. The City will work to support their efforts to meet the needs of their residents, whether in their inventory of public housing or their multifamily (tax credit) projects.

Homeless and Other Special Needs Activities

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

The Whatcom Homeless Service Center (HSC), a program of the Opportunity Council (OC), operates a centralized and coordinating homeless housing service center that serves the homeless population in the City of Bellingham. This Center serves as a hub for all homeless housing related activity in the community, including the coordination of homeless housing service providers and the management of the local homeless management information system (HMIS) by operating a single-point of entry.

One-Year Goals and Actions for Reducing & Ending Homelessness

The City's two highest priorities regarding addressing homelessness are to: support the development of emergency shelter in a safe, permanent location; and support programs to prevent chronic homelessness through intervention services like diversion and light touch case management. This Action Plan reflects continued support for agency programs that provide diversion and rapid rehousing for families and seniors. The City partnered with the Low Income Housing Institute and Road2Home to set up and operate a tiny house village to provide emergency shelter with supportive services, in coordination with the HSC and utilizing HMIS. The City continues to make available city property for temporary encampments and tiny house villages in multiple locations, and work with partner agencies on permanent emergency shelter solutions.

People who are homeless or at risk of becoming homeless may choose to enter the housing system through the HSC, and are then assigned case management and/or placement as available from an array of partnering, non-profit housing agencies. Housing counseling and advocacy become a significant part of the case management support provided. More general counseling and advocacy services are also available to low-income people at the Community Resource Center of the Opportunity Council which offers information and referral services to help people seeking a variety of services in addition to housing services. Bellingham has a variety of outreach services targeting the homeless population. The Homeless Outreach Team ("HOT team") has been operating since 2015 using local Housing Levy funds and more recently County support; the City contracted with the Opportunity Council for these services, and increased support for expansion of this team in 2021. The City is also part of a program in coordination with the County, and with the support of health care providers called Ground Level Response and Coordinated Engagement (GRACE). The GRACE program targets both housed and unhoused individuals who are frequent users of emergency services and offers additional assistance through embedded case workers within the Fire and Police departments. Both the HOT team and GRACE will continue their operations this Action Plan year, and GRACE is now being expanded to add a Law Enforcement Assisted Diversion (LEAD) program.

Other services available to assist those experiencing or at risk of homelessness include: Hope House, a program of Catholic Community Services; the Homeless Disability Benefits Advocacy Program; Base Camp shelter and program services run by Lighthouse Mission Ministries including a Mobile Outreach Team; the CORES program targeting mental health needs; and several meal programs. These programs have all undergone adaptations in the past two years due to the coronavirus pandemic, but they are all continuing to serve those in need. UnityCare Community Health Center provides on-site medical care services at Base Camp one day per week and offers dental services at their downtown site. Periodic mobile vaccine clinics are provided by the County Health Department for low-income residents, and the health department has been partnering to provide COVID-19 testing and vaccinations as needed.

Emergency Shelter / Transitional Housing

The City's strategy on homelessness encourages rapid rehousing of those that are homeless and targeted prevention for those that are at risk of becoming homeless. The City supports existing emergency shelter and transitional housing in the community through the city's public (human) service grant program, and with the Low Income Housing Institute/Road2Home to operate a tiny house village.

As seen across the State, the number of homeless persons in Bellingham and Whatcom County is not subsiding. The City administration continues to seek ways to partner with agencies to increase the number of beds available to persons living unsheltered, though this must be balanced with long-term solutions. City funds also support utilizing motels as a sheltering option for families with children, and is committed to finding better, more trauma-informed options for sheltering this population.

Helping homeless persons make the transition to permanent housing and independent living

The Homeless Service Center (HSC) administers rental subsidies (local funds) to homeless and at-risk households and matches the subsidy with case management support provided by one of several partnering, nonprofit housing agencies. Families with children, youth, and veteran households are among the populations that are supported by rental subsidies and case management. Additionally, the HSC administers Supportive Housing Program (SHP) subsidies to people who are chronically homeless, and coordinates the placement of vulnerable adults experiencing homelessness in the five permanent supportive housing facilities in Bellingham when there are openings. HSC also works closely with the Opportunity Council's Community Resource Center to operate the Rapid Rehousing program for families with moderate housing barriers who are homeless, including survivors of domestic violence. The following are some of the employment and job training programs that serve people who are homeless in Bellingham: WorkSource One-Stop Center, Opportunity Council employment specialist, Lake Whatcom Treatment Center and Compass Health employment specialists, Northwest Youth Services jobs training, and Department of Vocational Rehabilitation.

Helping low-income individuals and families avoid becoming homeless

The Homeless Service Center (HSC) helps to coordinate housing placements for people re-entering the community from institutions and implements a housing program for people on State disability assistance. Pioneer Human Services operates a 37-unit apartment (City Gate) that includes units for offenders re-entering from jail, as well as units for veterans. The City's increased support for diversion services targeting families with children and seniors offers assistance for those at risk of homelessness, with referrals coming both through the HSC and through the school district homeless liaisons. The City also offers assistance to childcare facilities that provide services to low-and moderate-income families through the human services program. Low-income families who have reliable and affordable childcare are more resilient to homelessness as parents can further their careers, providing more stability for their families.

Discussion

Despite past strides in bringing down the numbers of homeless families awaiting housing, Bellingham has struggled with rising family homelessness. The most significant barrier to accomplishing the goal to end homelessness in the community is funding and the constraint in the supply of housing, along with workforce shortages. With additional funding, the community has shown that it can have a significant effect on the number of homeless in our community, but that funding has not kept pace with increased costs and increased demand.

Barriers to Affordable Housing

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

The foundation of the City's Consolidated Plan was built on a variety of public outreach activities aimed at understanding barriers to affordable housing and fair housing. Specifically, the City convened a Community Solutions Workgroup (CSW) with multi-disciplinary stakeholders to tackle these issues and make recommendations that fed into the Consolidated Plan. The City also continues to review recommendations targeted at removing barriers to affordable housing: 1) Develop additional housing production revenue sources; 2) Strive to reduce land and building costs; and 3) Provide incentives for the creation of affordable housing. Many measures have been implemented regarding these recommendations, but more is needed as there continue to be significant challenges. In addition, the current County Health Improvement Plan (CHIP) process has identified housing for families with children as one of three top priorities for improving community health. The City is an active participant in implementation efforts related to the CHIP.

Actions planned to remove barriers

The City continues to work with developers to encourage utilization of multifamily tax exemption incentives, and partners with developers on low income tax credit and bond financed projects. Work by City staff to analyze the menu of incentives available to housing developers and determine the most effective way to encourage more for-profit developers to build additional affordable housing units was put on hold due to staffing demands during COVID-19, but will again get underway when possible. The city also analyzes any unutilized or underutilized land that may be able to be used for housing development partnerships. The City also offers reductions for low-income housing with regard to certain fees and charges that affect affordability.

Discussion

The City remains committed to removing or ameliorating the negative effects of public policies that serve as barriers to affordable housing.

Other Actions

AP-85 Other Actions – 91.220(k)

The City will undertake, or support the efforts of other agencies, that meet the needs of low-income persons and households.

Actions planned to address obstacles to meeting underserved needs

- The City will work with other funding agencies, including Whatcom County, United Way of Whatcom County and private foundations, to coordinate funding to more effectively meet the needs of the community.
- The City will seek opportunities to increase funding available for affordable housing.
- The City will work to inform lenders and households regarding Fair Housing laws, and in particular, to encourage greater participation by minorities and ethnic groups disproportionately represented in homeownership.

Actions planned to foster and maintain affordable housing

- Most of the city's affordable housing inventory is owned and managed by non-profit housing providers. The City works in partnership with the Washington State Housing Finance Commission to monitor expiring tax credit projects, and maintains a pathway for rapid acquisition to preserve affordable housing at risk of being lost from the local inventory. To the extent willing nonprofits have the capacity to do so, the City will work with providers when time comes to expand their inventory and/or renew tax credits or pursue other strategies to ensure continued viability of the housing.

Actions planned to reduce lead-based paint hazards

- All housing rehabilitation efforts on homes that were built before 1978 will include lead-based paint hazard evaluations. All hazards will be addressed, either through abatement or interim controls to minimize the hazards.
- The City will continue to provide educational information about the hazards of lead-based paint. Information is available on the City's web site, and City staff provides information targeted to parents of young children through specific outreach to day care centers.

Actions planned to reduce the number of poverty-level families

- The City will support the efforts of non-profit agencies that are working to reduce the number of poverty-level families. These efforts include the Asset Building Coalition sponsored by the Opportunity Council, and the work of United Way, the Whatcom Community Foundation, Mount Baker Foundation and Chuckanut Health Foundation of Whatcom County.
- The City will support the efforts of other public agencies that work to reduce the number of people in poverty. Whatcom County and Washington State's WorkFirst Program work towards

this end, as well as WorkSource and GoodWill Industries.

Actions planned to develop institutional structure

- The City will continue to work with public and nonprofit funding agencies to identify ways to coordinate and improve the effectiveness of the institutional system of funding housing and low-income community development needs in the community.
- The City will continue to work with all housing and human service agencies to coordinate and improve communications. The Community Development Advisory Board will be one mechanism for hearing other program and institutional issues and addressing ways to improve the system in Bellingham.

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

- The City will continue to support the efforts of the Whatcom County Coalition to End Homelessness Steering Committee, which coordinates the actions of housing and social service agencies in the community; as well as participate in committees focused on addressing supportive services in all housing where it's needed.

Discussion

Voters in the City of Bellingham approved a Low-income Housing Levy in 2012, and again in 2018. This levy is now providing \$4 million per year over ten years. The City began implementation of this levy in 2013, using the needs and priorities identified in the Consolidated Plan as a baseline for this program. Bellingham City Council approved a local sales tax in 2021, bringing in an additional \$3 million (estimated) per year to address housing development and services. As a result of these local funds, significant attention is able to be paid to addressing obstacles, affordable housing supply, institutional structure and coordination.

Program Specific Requirements

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

The 2022 Action Plan continues proven programs that the City has implemented for many years, including rehabilitation of homeowner units, homebuyer assistance, public (human) services, tenant-based rental assistance and housing development. The entirety of the anticipated CDBG program income has already been reprogrammed through projects included in this action plan (and tied to this or previous years).

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan: 2020, 2021, 2022	75.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

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

No other forms of investment are used beyond those identified in Section 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for

homebuyer activities as required in 92.254, is as follows:

The City of Bellingham has selected the resale and recapture provisions that comply with HOME statutory and regulatory requirements. These policies are selected based on program, and not on a case-by-case basis. The City's Resale and Recapture policies are included by reference, and also in the unique appendices to this Action Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City has a monitoring policy and procedure to ensure affordability of units acquired with HOME funds. Annual notices are provided to HOME-funded properties regarding new income determinations, HOME rents and utility allowances. Annual income certifications are received from the properties, a desk review is completed, and – when public health protocols allow – on-site inspection is completed based on a risk-assessment schedule and HOME rules for monitoring.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds are not proposed to assist in the refinancing of existing debt secured by multifamily housing that is rehabilitated with HOME funds.


CDAB Housing Project Update

April 2022


Listing of projects in Action Plans that are not yet completed

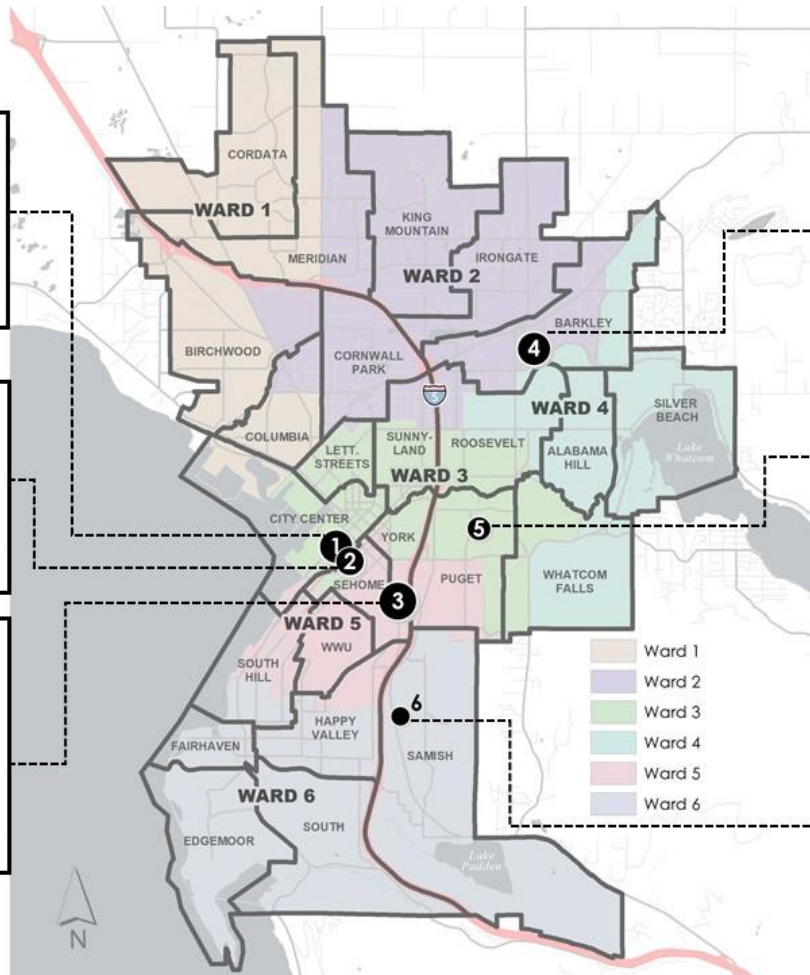
[acronyms: SFH= single family home; PSH= permanent supportive housing; ELC= early learning center; m= million; AMI= area median income; FWC= families with children] PROJECT LISTED IN THE ORDER THAT CORRESPONDS WITH THE MAP NUMBERING

PROJECT	DESCRIPTION	STATUS	LOCATION	CITY FUNDING	TOTAL	Notes
Mercy, Millworks (+ELC)	83 units (below 30%, 50%, & 60% AMI)	Planning	City Center (Waterfront) NW Corner of W Laurel & Cornwall Ave	\$3,000,000 + State CHIP ARPA/Levy	~\$32m	ELC portion will be additional. City Council approved ARPA portion for both housing & ELC in February. 10% of units for homeless-on-entry.
Opportunity Council, Laurel & Forrest (+ELC)	56 units, targeted to seniors (below 30% & 50% AMI)	Planning	Sehome 1000 N Forest St	\$2,000,000 HOME/Levy	~\$22m	10% of units for homeless-on-entry. County a significant funder of housing + ELC (using their ARPA)
BHA, Samish Family (+ELC)	49 units, targeted to families (below 50% & 60% AMI)	Under construction	Sehome 321 N Samish Way	\$3,252,750 Levy/ARPA	~\$22m	ELC is separate contract with additional \$750k from City ARPA
BHA, Samish Senior	53 units, targeted to seniors (below 30% & 50% AMI)	Under construction	Sehome 301 N Samish Way	\$2,477,250 Levy	~\$20m	Constructed concurrently with Family building (below)
Mercy, Barkley Family Housing	77-units, targeted to families (below 30% & 50% AMI)	Under construction	Barkley Rimland Drive	\$3,350,000 HOME/Levy	~\$25m	10% of units for homeless-on-entry Currently about 30% complete.
Lydia Place, Heart House (+ELC)	11-unit, PSH for families (100% homeless-on-entry)	Under construction	Puget 17901 Gladstone St	\$1,723,750 HOME/Levy	~\$4m	Completion anticipated by June.
NWYS, PAD	SFH for up to 12, <18 yo youth	Purchased, improvements in process	Samish 1000 36 th St	\$574,647 perm + bridge CDBG/Levy	~\$1.4m	State Rapid Acquisition funding awarded in late December. Improvements related to fire safety & ADA underway.
FWC Interim Housing Facility		Planning	TBD			In scoping phase w/consultant assistance

 **1**
Millworks Housing (Mercy)
 86 units
 Early Learning Center


 **2**
Laurel & Forest Senior Housing (Opportunity Council)
 56 units
 Early Learning Center

 **3**
Samish Commons (Bham Housing Authority)
 Samish Senior (53 units)
 Samish Family (49 units)
 Early Learning Center



 **4**
Barkley Village Family Housing (Mercy)
 77 units

 **5**
Heart House - Families (Lydia Place)
 11 units
 Early Learning Center

 **6**
Single Family Home (NWYS, PAD)
 for 12 youth