

RESOLUTION NO. 2023-05

A RESOLUTION of the City Council of the City of Lakewood, Washington, adopting the Fiscal Year 2023 (July 1, 2023 – June 30, 2024) Joint Tacoma and Lakewood Consolidated Annual Action Plan, including Amendment to Fiscal Year 2021 Consolidated Annual Action Plan.

WHEREAS, the City of Lakewood, Washington, qualifies as an eligible Community Development Block Grant (CDBG) entitlement city, and the City Council has elected to pursue funding through that entitlement process; and

WHEREAS, the City of Lakewood also entered into an agreement with the City of Tacoma for participation in their Home Investment Partnership Act (HOME) Consortium Programs; and

WHEREAS, in connection therewith, the City Council provided for a Community Services Advisory Board; and

WHEREAS, in order to receive CDBG and HOME federal dollars for Fiscal Year 2023, commencing on July 1, 2023, HUD requires participating jurisdictions to submit an Annual Action Plan defining the proposed use of CDBG and HOME funds for the Fiscal Year 2023, which Plan must be adopted by the city councils of the participating jurisdictions and submitted to HUD no later than May 15, 2023; and

WHEREAS, the City of Lakewood's Fiscal Year 2023 CDBG and HOME funding allocations from the Department of Housing and Urban Development (HUD) shall be \$542,464 for CDBG and \$379,236 for HOME; and

WHEREAS, upon HUD's review and approval, contracts would then need to be prepared for CDBG entitlements and Tacoma/Lakewood HOME Consortium members; and

WHEREAS, in connection with such funding allocations-application process, it is appropriate that the City Council adopt a Fiscal Year 2023 Consolidated Annual Action Plan, including Amendment to Fiscal Year 2021 Consolidated Annual Action Plan.

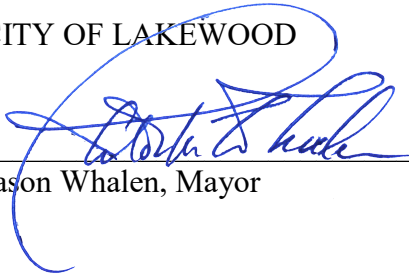
NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF LAKEWOOD, WASHINGTON HEREBY RESOLVES, as Follows:

Section 1. That the Joint Tacoma and Lakewood Fiscal Year 2023 Consolidated Annual Action Plan, including Amendment to Fiscal Year 2021 Consolidated Annual Action Plan, a copy of which is attached hereto, marked as Exhibit "A" and incorporated herein by this reference, be, and the same hereby is, adopted. The City Manager or designee is authorized to adjust allocations on a prorata basis to reflect actual program funding allocations.

Section 2. That this Resolution shall be in full force and effect upon passage and signatures hereon.

PASSED by the City Council this 1st day of May, 2023.

CITY OF LAKEWOOD




Jason Whalen, Mayor

Attest:



Briana Schumacher, City Clerk

Approved as to Form:



Heidi Ann Wachter, City Attorney

City of Lakewood

FY 2023 Consolidated Annual Action Plan



Tacoma-Lakewood
HOME Consortium

April 28, 2023

Annual Action Plan
2021

Executive Summary

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

1. Introduction

The FY 2023 Consolidated Plans for the Tacoma-Lakewood Consortium provide a framework for addressing housing and community development needs in these cities. The Plans are developed for the U.S. Department of Housing and Urban Development to define how funding is to be allocated for the following federal programs: Community Development Block Grant Program (CDBG), HOME Investment Partnership Act (HOME), and for the City of Tacoma, Emergency Shelter Grants (ESG).

The FY 2023 Annual Action Plan (July 1, 2023 – June 30, 2024), Lakewood's fourth under the 5-YR Consolidated Plan (2020-2024), is a one-year plan that addresses local community and economic development needs and the resources necessary to meet the needs of low- and moderate-income households. The Plan identifies unique needs and assets in Lakewood and Tacoma, as well as on a regional basis. Goals and priorities of the Annual Action Plan are to be consistent with national objectives and priorities established by HUD and shall be consistent with the goals and strategies identified in the 5-YR Consolidated Plan.

Strategies identified in this Plan were built upon a broad citizen participation process in consultation with public and private agencies. Through this planning process, FY 2023 policies and priorities were developed to be consistent with those long-term goals established as part of the 5-YR Consolidated Plan (2020-2024). Priority needs identified as part of the Plan include, housing instability among residents, including homelessness; a limited supply of diverse rental and homeownership opportunities; the need for accessible, culturally competent services; and the need for safe, accessible homes and facilities. All needs identified were prioritized as high.

2. Summarize the objectives and outcomes identified in the Plan

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

The 2023 Annual Action Plan will focus on the following priority needs identified in the 5-YR Consolidated Plan:

- Housing instability among residents, including homelessness – Programs continue to prioritize housing affordability through rehabilitation of owner-occupied housing units, neighborhood

revitalization through the removal of blighted properties, and relocation assistance for low-income households displaced through no fault of their own.

- Limited supply of diverse rental and homeownership opportunities – Funding will focus on providing additional affordable rental opportunities through the development of new affordable homeownership and rental opportunities for low-income households.
- Need for accessible, culturally competent services – Services include the provision of emergency assistance payments for basic services such as food, clothing, or housing-related expenses to low-income households, especially for those minority households disproportionately impacted by the lingering effects of the coronavirus pandemic. Fair housing counseling services will be provided through program administration funding.

Recommended funding allocations for FY 2023, including the reprogramming of unexpended FY 2021 CDBG funding, include:

- *Housing Improvements* – Funding totaling \$352,929.36 (2023 CDBG allocation of \$248,971.20, reallocation of \$3,958.16 in unexpended FY 2021 Administration funds, and \$100,000 in program income) is recommended in support of the Major Home Repair Program; \$10,000 in support of CDBG Administration of HOME housing; \$75,000 in support of Rebuilding Together South Sound’s homeowner-occupied housing rehabilitation activities for low-income households who do not meet program requirements of the City’s Major Home Repair program; and \$20,000 in support of Emergency Assistance for Displaced Residents. A total of \$375,000 in program income is to be reallocated as part of this Plan - \$100,000 in revolving loan funds in support of Major Home Repair, and \$275,000 in Neighborhood Stabilization Program 1 (NSP1) revolving loan funds for similar activities.

A total of \$469,614 (2023 HOME allocation of \$341,312, plus reallocation of \$128,302 in program income) in HOME funding is recommended in support of increasing the supply of affordable homeownership and rental opportunities for low-income Lakewood residents. In February 2023, Council approved an allocation of \$1,000,000 in ARPA funding in support of LASA’s construction of new affordable rental housing in the downtown core. HOME funding allocations for Lakewood may be found in Tacoma’s 2023 Joint Consolidated Annual Action Plan.

- *Public Services* – \$80,000 is recommended in support of emergency assistance payments for basic services such as food, clothing or housing-related expenses to low-income households, especially for those minority households disproportionately impacted by the lingering effects of the coronavirus pandemic and those impacted by rising rents. Fair housing counseling services will be funded through program administration. Funding in support of public and human services programs is provided as part of the City’s 1% General Fund allocation totaling \$457,500 in 2023, with an additional \$2,750,000 in ARPA funding awarded to support Nourish Pierce County and Emergency Food Network’s emergency food bank program operations through the construction of new and renovation of existing operations facilities.

- *Physical/Infrastructure Improvements* – No funding recommended.
- *Administrative Activities* – Funding totaling \$108,492.80 in support of general administrative activities for CDBG.

3. Evaluation of past performance

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

The 5-YR Consolidated Plan (2020-2024) for Lakewood identified five primary goals: 1) Stabilize existing residents; 2) Increase rental and homeownership opportunities; 3) Prevent and reduce homelessness; 4) Need of accessible, culturally competent services; and 5) Support of public infrastructure improvements.

As the Consolidated Plan moves into its fourth year, the City looks to continue funding strategies consistent with the priority needs identified in the Plan and remains on track to meet the five-year goals identified in the Plan. Access to safe, decent, affordable housing remains the primary objective of the planning process moving forward. As Lakewood area rents continue to rise and housing prices continue to remain out of reach for many of Lakewood’s low- and moderate-income households, the urgency to develop long-term strategies to increase the supply of affordable housing options for low- and moderate-income households increases.

While the City of Lakewood has seen some of its five-year goals delayed due to the effects of shifting funding priorities and resources related to the coronavirus pandemic, it does expect to meet or exceed the benchmarks established as part of the overall 5-YR Consolidated Plan. As additional funding streams have become available, at both the State and federal levels, the City has positioned itself to take advantage of these opportunities, refocusing priorities in the wake of the coronavirus pandemic towards the development of affordable rental opportunities and the construction of new affordable housing options for low- and moderate-income households. This strategy becomes especially apparent when looking to address housing issues for Lakewood’s most impacted households – those living in poverty in the last 12 months (13.9% of Lakewood’s population) and those cost-burdened families or those households who pay more than 30 percent of their income for housing expenses (52.2% for renter households and 25.4% for owner-occupied households).

A complete evaluation of the performance measures, including program expenditures and accomplishments, will be provided as part of the Consolidated Annual Performance Evaluation Report (CAPER) for FY 2022.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The FY 2023 Annual Action Plan was developed in coordination with the City of Tacoma and local organizations, agencies, and stakeholders. The Plan was developed in accordance with requirements established by the U.S. Department of Housing and Urban Development and the Citizen Participation Plan as adopted by the City of Lakewood. Citizen activities included notification in the Tacoma News Tribune on January 12, 2023 of a January 30, 2023 public hearing held by city staff for FY 2023 (July 1, 2023 – June 30, 2024) Community Development Block Grant (CDBG) and HOME Investment Partnership Act (HOME) program funding. One additional public hearing was held before the Community Services Advisory Board (CSAB) on March 15, 2023 seeking citizen input on community and economic development, housing, and public service’s needs.

Notification of the Draft FY 2023 Annual Action Plan was published in the Tacoma News Tribune indicating where the document was available for review during the 30-day citizen comment period (April 1, 2023 – April 30, 2023). A public hearing was held by the Lakewood City Council on April 17, 2023 to solicit comments from citizens, local for-profit and non-profit agencies, neighborhood associations, the State of Washington, Pierce County, City of Tacoma, local public housing authorities, and other interested parties on the draft document. Copies of the Plan were posted on the City’s website and available to those requesting copies. Records on the proposed housing and community development projects were made accessible to the general public. Comments received at these public hearings are summarized later in this report.

5. Summary of public comments

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

The following comments were received as part of the FY 2023 citizen participation process. They include testimony provided at the January 30, 2023 and March 15, 2023 public hearings, and the Lakewood City Council public hearing on April 17, 2023:

2023 Annual Action Plan Public Hearing – January 30, 2023

At the January 30, 2023 public hearing held by City staff, the City received multiple comments from nine (9) public attendees. Comments received focused primarily upon the need for affordable housing, transitional housing, and related housing programs and expenses such as moving and relocation

expenses, utility expenses and liens, screening fees, rent deposits, and financial counseling. Support for affordable housing included additional investment in infrastructure development in support of low-income housing developers and the provision of down payment assistance programs for low-income homebuyers. Additional comments focused on the need for housing and services for the homeless, including warming and cooling centers, shelter and transitional housing, and additional locations for access to services and resources. Comments included support of the maintenance of housing affordability for those owner-occupied households through maintenance and repair programs, and the move to green energy systems and away from traditional high-carbon use heating and cooling systems.

2023 Annual Action Plan Public Hearing – Community Services Advisory Board – March 15, 2023

No comments received.

30-Day Public Comment Period (April 1, 2023 – April 30, 2023) and City Council Public Hearing on Approval of the FY 2023 Annual Action Plan (April 17, 2023)

One (1) comment was received at the March 17th public hearing. Mr. Dennis Haugen, resident of Sioux Falls South Dakota questioned the construction of affordable housing for low-income persons and asked if the persons residing in these homes actually had jobs.

One (1) written comment was received from Ms. Linda Davis who wrote in support of the need for sidewalk improvements along Meadow Rd. SW between 100th St. and Ardmore Dr. SW as access to bus service for persons with disabilities was limited in that area due to the lack of sidewalks.

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

2023 Annual Action Plan Public Hearing – January 30, 2023

All comments were accepted.

2023 Annual Action Plan Public Hearing – Community Services Advisory Board – March 15, 2023

No comments received.

30-Day Public Comment Period (April 1, 2023 – April 30, 2023) and City Council Public Hearing on Approval of the FY 2023 Annual Action Plan (April 17, 2023)

All comments were accepted.

7. Summary

Section 108 – Principal repayment for 2023 includes \$33,000 in principal repayment by Curbside Motors and \$17,000 in principal for repayment by LASA for the Client Service Center project. The table below summarizes the City's Section 108 outstanding balances and scheduled principal repayments:

PROJECT	SECTION 108 BALANCE	ANTICIPATED INCOME – 2022	PRINCIPAL REPAYMENT - 2022
Curbside Motors	\$477,000	\$50,607.00	\$33,000
LASA Client Service Center	\$262,000	\$26,753.50	\$17,000

Table 1 - Section 108 Loan Program - 2023

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

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

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

Agency Role	Name	Department/Agency
Lead Agency	Lakewood, WA	Community Development
CDBG Administrator	Lakewood, WA	Community Development

Table 1 – Responsible Agencies

Narrative

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

Consolidated Plan Public Contact Information

City of Lakewood
Community Development Department
Attn: Mr. Dave Bugher, Assistant City Manager
6000 Main Street SW.
Lakewood, WA 98499
(253) 589-2489
dbugher@cityoflakewood.us

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

1. Introduction

The FY 2023 Annual Action Plan was developed to provide a general framework for addressing housing and community development needs in the City of Lakewood. In a larger sense, the plan involves a regional element to coordinate and address economic development, transportation, public services, special needs, housing, and homelessness throughout Pierce County. Coordination included consultation with the City of Tacoma, Pierce County, Pierce County Continuum of Care, Pierce County Housing Authority, Living Access Support Alliance (LASA), Tacoma/Pierce County Habitat for Humanity, Homeownership Center of Tacoma, South Sound Housing Affordability Partners, Tacoma/Pierce County Affordable Housing Consortium, and other stakeholders as provided in the Plan.

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

As part of the planning process, the City of Lakewood established a committee to provide public oversight, comment on the process, and to review funding recommendations for both the CDBG and HOME programs. As part of the development of the 5-YR Consolidated Plan (2020-2024), the City solicited input through interviews, meetings, and public hearings to determine community need, priorities, and approaches to meeting those needs. Since the development of the 5-Year Plan, the City has continued to consult with many of the agencies and organizations originally polled.

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

As part of the City’s human services funding process, monthly coalition meetings are held at the City to bring together non-profits, service providers and governmental agencies to help determine and better understand the need for housing and human services in Lakewood and throughout Pierce County. Coordination through the South Sound Military and Communities Partnership (SSMCP) continues an ongoing partnership with Joint Base Lewis McChord to better understand what level of assistance military personnel and veterans are experiencing in terms of housing need, health and human services, and mental health care assistance.

Lakewood sought comment internally from City departments on housing and community development needs and services to low income and special needs populations. On a regional level, the consolidated planning process involved consultation with Pierce County Community Connections, the City of Tacoma, United Way of Pierce County, the Pierce County Housing Authority, Tacoma/Pierce County Habitat for Humanity, the Homeownership Center of Tacoma, Living Access Support Alliance (LASA), South Sound Housing Affordability Partners, Tacoma/Pierce County Affordable Housing Consortium, Lakewood Community Services Advisory Board, Tacoma/Lakewood/Pierce County Continuum of Care, local school districts, police and fire departments, and the State of Washington, to better understand the needs of at risk populations such as homeless families with children, single parent households, victims of domestic violence, individuals with disabilities, ethnic minorities, and the elderly.

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

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

The cities of Tacoma and Lakewood are actively engaged members of the Tacoma/Lakewood/Pierce Continuum of Care Committee. The three jurisdictions are the most involved governmental entities in the Continuum, cooperatively working on programs to meet needs for housing and services. Both Tacoma and Lakewood support the Continuum's priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The mission of the Continuum of Care is to promote community wide commitment to ending homelessness through policy and resource alignment by implementing activities to achieve the goals and objectives of the Plan to End Homelessness.

In recent years, the Continuum has moved from a single point of access, or centralized intake, to that of a coordinated entry system providing many points of entry. This system, when coupled with an active diversion program, known as Housing Solutions Conversations, aims at keeping those in housing crisis from entering the system by supporting their own identification of a solution and prioritizes them for a specific housing referral based on their vulnerabilities and the severity of their barriers to secure housing. Through this partnership and implementation of the Five-Year Plan to Address Homelessness, stands a countywide commitment to ensure all persons facing homelessness have access to shelter and support, no matter their social or economic circumstances or where they live within Pierce County.

As housing prices and market-rate rents continue to rise at alarming rates, further destabilizing housing affordability and limiting housing options for low- and moderate-income households, this coordinated and cooperative effort to ensure affordable housing stability and access to a safe home endure as a realistic and attainable goal for all in our community.

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

The cities of Tacoma and Lakewood work closely with the Collaborative Applicant of the Continuum of Care (Pierce County) planning for allocation and use of Emergency Solutions Grant (ESG) funds. ESG policies and procedures were created and are updated periodically in cooperation with Pierce County and Tacoma to ensure that ESG subrecipients are operating programs consistently across eligible activities. Performance is reviewed by both entities. The Collaborative Applicant is also the HMIS lead and works closely with City of Tacoma to maximize use of HMIS resources and to draw data for reports on project performance and program outcomes. The City of Lakewood does not receive ESG funding.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	City of Tacoma
	Agency/Group/Organization Type	Other government - Local
	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 Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	As the lead member of the Tacoma-Lakewood HOME Consortium, Tacoma remains a key partner in the development and implementation of the consolidated planning process. The City of Tacoma was consulted in the development of priorities and strategies designed to meet the various community and economic development needs identified in this Plan. Lakewood and Tacoma will continue to coordinate their efforts to ensure the goals and outcomes identified in the 5-YR Consolidated Plan (2020-2024) are satisfied.
2	Agency/Group/Organization	Pierce County Community Connections
	Agency/Group/Organization Type	Other government - Local

	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 Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Pierce County Community Connections is a partner agency in a regional effort to end homelessness, encourage community and economic development efforts benefitting low-income individuals, to expand safe, decent, affordable housing, and in the provision of public and human services to individuals in need. As a recipient of CDBG, HOME, and ESG funding, the County is a natural partner with the cities of Lakewood and Tacoma in determining a regional approach to housing and community development activities.
3	Agency/Group/Organization	Pierce County Continuum of Care
	Agency/Group/Organization Type	Regional organization Regional Continuum of Care

	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 Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Tacoma, Lakewood, and Pierce County all take active rolls on the Continuum of Care Committee. The goal of the Continuum is to promote community wide commitment to ending homelessness through policy and resource alignment by implementing activities to achieve the goals and objectives of the Plan to End Homelessness. Members of the Continuum strive to ensure all persons facing homelessness have critical access to shelter and support designed to make homelessness a brief event.
4	Agency/Group/Organization	Pierce County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Market Analysis Anti-poverty Strategy

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The Pierce County Housing Authority (PCHA) is a vital partner to the City of Lakewood in its efforts to increase and preserve affordable housing options for low-income households. PCHA manages a number of programs such as scattered site public housing, Section 8 vouchers, and enterprise fund apartments to provide housing stability to many low-income Lakewood households. As an operator and developer of affordable housing serving in excess of 5,000 individuals, the housing authority was consulted to provide information on the need for public housing in Lakewood and in greater-Pierce County. As recently as FY 2022, Lakewood partnered with PCHA and fund the rehabilitation of two low-income public housing complexes within the City of Lakewood - Village Square and Oakleaf Apartments, serving 64 total households.</p>
5	<p>Agency/Group/Organization</p>	<p>Tacoma Pierce County Habitat for Humanity</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs Market Analysis Anti-poverty Strategy</p>

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Tacoma/Pierce County Habitat for Humanity remains an integral part of Lakewood's approach to providing safe, decent, affordable housing to low-income households in Lakewood and Tacoma. Lakewood recognizes the crucial link between wealth building and homeownership, especially for minority and low-income households. Consultation with the agency focused on housing need, market analysis, anti-poverty strategy, veteran housing opportunities, and special needs housing. Lakewood looks forward to ongoing and continued coordination with Habitat as it seeks to expand affordable housing options for low-income families and make much needed improvements to distressed communities through redevelopment activities focused on replacing older blighted homes with newly constructed affordable single-family homes. As housing and land prices continue to spiral, the City and Habitat have begun to explore land trust models to ensure investments in affordable housing continue for generations to come.</p>
6	<p>Agency/Group/Organization</p>	<p>LASA</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-homeless</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy</p>

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	LASA was consulted as part of the planning process to better define and understand the scope and type of homeless need in Pierce County. LASA continues to be an integral provider in the fabric of homeless services and housing assistance to the homeless and those at risk of homelessness. With LASA's ongoing partnerships with the Pierce County and Tacoma Housing Authorities, and operation of housing and services facilities for the homeless, LASA is uniquely positioned to understand and assist the homeless population in Lakewood and Pierce County. Partnership and coordination with LASA allows Lakewood a better understanding of the needs of those living at or below the poverty rate, as well as what seems to be an ever-increasing demand for homeless services. Current partnership with LASA involves the expansion of homeless services at its service center facility, and the potential development of 25 new affordable rental units located in the downtown core.
7	Agency/Group/Organization	Homeownership Center of Tacoma
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with the agency included housing need, market analysis, and anti-poverty strategy. Lakewood anticipates continued partnership with the agency in FY 2024 to provide additional affordable housing options to low-income households seeking homeownership opportunities through targeted redevelopment of blighted properties with newly constructed affordable single-family homes.
8	Agency/Group/Organization	South Sound Housing Affordability Partners
	Agency/Group/Organization Type	Regional organization Housing

What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	South Sound Housing Affordability Partners (SSHA ³ P) is an intergovernmental collaboration between the Cities and Towns of Auburn, DuPont, Edgewood, Fife, Fircrest, Gig Harbor, Lakewood, Milton, Puyallup, Sumner, Steilacoom, Tacoma, and University Place, Pierce County and the Puyallup Tribe of Indians, working together to create and preserve affordable, attainable, and accessible housing throughout the participating communities. Consultation focused on market trends, analysis of housing affordability, and means of advocacy to generate dedicated revenue streams in support of affordable housing development throughout Pierce County.
Agency/Group/Organization	Tacoma/Pierce County Affordable Housing Consortium
Agency/Group/Organization Type	Regional organization Housing
What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Tacoma/Pierce County Affordable Housing Consortium is a non-profit organization designed to bring together various groups, organizations, business, and governmental agencies and jurisdictions with a focus on developing and preserving access to decent, safe, and high-quality affordable housing. Consultation focused on advocacy efforts to fund and develop affordable housing, as well as current and ongoing market trends that may be causing inequities in the housing market.

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

N/A

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Pierce County	The mission of the Road Home Continuum of Care is to promote community wide commitment to ending homelessness through policy and resource alignment by implementing activities to achieve the goals and objectives of the Plan to End Homelessness.
City of Lakewood Comprehensive Plan	City of Lakewood	The plan encourages infill housing, cottage-style development, changes in zoning to permit higher densities, and incentivizes the construction of affordable housing.

Table 3 - Other local / regional / federal planning efforts

Narrative

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

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

Citizen input for the FY 2023 Annual Action Plan was conducted in accordance with the requirements established by the U.S. Department of Housing and Urban Development and the City of Lakewood Citizen Participation Plan. Citizen participation was encouraged throughout the process culminating in the development of this FY 2023 Annual Action Plan.

The process included:

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

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

- January 30, 2023 – Public hearing on housing and community development needs
- March 15, 2023 – Public hearing before CSAB on housing and community development needs
- April 1 - April 30, 2023 – Public Comment Period
- April 17, 2023 – Public hearing on FY 2023 Annual Action Plan

A draft of the FY 2023 Annual Action Plan was made available to the public for review beginning April 1, 2023. Comments received through the citizen participation process were incorporated into the Plan. Formal approval of the final Plan was made by City Council on May 1, 2023.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	Notification of January 30, 2023 public hearing on housing and community development needs for CDBG and HOME funding.	Comments detailing the public hearing are summarized in item #2 below.	N/A	
2	Public Meeting	Non-targeted/broad community	<p>January 30, 2023 public meeting on FY 2023 Annual Action Plan funding priorities for CDBG and HOME programs.</p> <p>Comments were received from nine (9) attendees.</p>	<p>Comments received focused on affordable housing, transitional housing, and related housing programs and expenses such as moving and relocation expenses, utility expenses and liens, screening fees, rent deposits, and financial counseling.</p>	All comments accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Non-targeted/broad community	Notification of March 15, 2023 public hearing on housing and community development needs for CDBG and HOME funding – CSAB public hearing.	Comments detailing the public hearing will be summarized in item #4 below.		
4	Public Meeting	Non-targeted/broad community	March 15, 2023 public meeting on FY 2023 Annual Action Plan funding priorities for CDBG and HOME programs – CSAB public hearing.	No comments received.	N/A	
5	Newspaper Ad	Non-targeted community	Notification of April 17, 2023 public hearing and April 1 - April 30, 2023 public comment period.	Comments detailing the public hearing will be summarized in item #7 below.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Internet Outreach	Non-targeted/broad community	Notification of April 17, 2023 public hearing, April 1 - April 30, 2023 public comment period, and provision of Annual Action Plan.	Comments detailing the public hearing will be summarized in item #7 below.		
7	Public Hearing	Non-targeted/broad community	April 17, 2023 public hearing held by the Lakewood City Council.	One comment was received from Mr. Dennis Haugen, resident of Sioux Falls South Dakota. Mr. Haugen questioned the construction of affordable housing for low-income persons and asked if the persons residing in these homes actually had jobs.	All comments accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	30-Day Public Comment Period	Non-targeted/broad community	April 1 - April 30, 2023 30-day public comment period.	One written comment was received from Ms. Linda Davis who wrote in support of the need for sidewalk improvements along Meadow Rd. SW between 100 th St. and Ardmore Dr. SW as access to bus service for persons with disabilities was limited in that area due to the lack of sidewalks.	All comments accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Funding for FY 2023 is provided by the U.S. Department of Housing and Urban Development through the Community Development Block Grant (CDBG) Program. Additional programmatic funding is being generated through program income and the reprogramming of unexpended funds from fiscal year 2021. All funds received, and otherwise reprogrammed, will be allocated to activities in support of the goals and objectives identified in the 5-YR Consolidated Plan. Additional funding for public service activities will be supported with General Fund in accordance with a City Council-adopted strategic plan for human services. Local funds in support of affordable housing will be made available through the implementation of SHB-1406 affordable housing sales tax credit to assist households with income at or below 60% of the area median income.

CDBG funding in FY 2023 will focus on housing instability among residents, including homelessness; the expansion of affordable rental and homeownership opportunities; and the need for accessible, culturally competent services. Specifically, investments will include the rehabilitation of owner-occupied housing units; neighborhood revitalization through the removal of blighted properties; relocation assistance for low-income households displaced through no fault of their own; provision of emergency assistance payments to low-income households; and fair housing counseling services.

Additional activities will include ongoing assistance and programs funded through previous Annual Action Plans, including Habitat for Humanity's construction of new affordable housing units in the Tillicum neighborhood, and emergency relocation assistance for families displaced through no fault of their own. Program income generated in FY 2023 will continue to support housing affordability efforts through the City's Major Home Repair Revolving Loan Fund. Finally, activities seeking the stabilization of existing residents through the creation of safe, accessible homes and facilities will focus on the redevelopment of slum and blight conditions in communities adversely impacted by disproportionate foreclosure and vacancy rates through the City's Neighborhood Stabilization Program 1 (NSP1) Dangerous and Nuisance Abatement Revolving Loan Fund.

Additional HOME-funded activities in support of the expansion of affordable rental and homeownership opportunities will include the funding of the HOME Affordable Housing Fund, intended to support the development of new rental housing and homeownership opportunities for low-income households. Council is reviewing funding requests from LASA to partner in the support and development of new affordable rental housing owned and operated by LASA. Program income will support affordable housing development. HOME funding activities are detailed in Tacoma's Annual Action Plan as lead

agency in the Tacoma-Lakewood HOME Consortium.

The City of Lakewood has employed a conservative approach for estimating CDBG and HOME allocations and program income for FY 2023 and the remainder of the 5-YR Consolidated Plan. Differences in actual funding allocations will be addressed on a pro rata basis.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	542,464	100,000	3,958.16	646,422.16	625,000	Prior year resources include reprogrammed funds from the following FY 2021 Administration activities (\$3,958.16; Activity 230). Anticipated program income of \$100,000 is composed of RLF activities for Major Home Repair. Section 108 income of \$77,360.50 is not included in this total.
Other	public - federal	Economic Development Housing Public Improvements Other	0	275,000	0	275,000	30,000	NSP1 funds were awarded to Lakewood in 2009 through the Washington State Department of Commerce to address issues of slums and blight through the demolition of homes that have been foreclosed, abandoned or have been left vacant. Funds may also be used to acquire and redevelop foreclosed and abandoned properties for the purpose of constructing safe, decent, affordable housing for low-income individuals. Anticipated program income of \$275,000 for NSP1 Abatement Fund RLF activities.

Table 5 - Expected Resources – Priority Table

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

Leveraging for 2023 CDBG projects will primarily come in the form of matching of goods and services provided through homeowner rehabilitation activities performed by Rebuilding Together South Sound (RTSS). Lakewood funds for program staffing for RTSS are expected to return leverage funding ratios between 4:1 and 5:1 for program activities. Additional leveraging will come in the way of conventional financing, secured by low-income homebuyers through private-sector banking and lending institutions, as part of the City's efforts to construct new homeownership opportunities through partnership with Habitat for Humanity. The City anticipates leverage ratios of between 3:1 and 4:1 for homebuyer activities. All other CDBG activities, including homeowner rehabilitation, emergency payments, and relocation assistance typically see little to no leveraging of funds as these programs are designed as emergency nets providing assistance where none would otherwise exist and low- or no-interest loans to assist clients who would otherwise be unable to pursue commercial loans to repair their home were it not for this type of assistance. Many clients have credit issues restricting their access to funding, limited incomes, and are often occupied by the elderly or minority populations dealing with certain systemic housing-related inequities limiting their access to safe, decent, and affordable housing.

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

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

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

Discussion

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Stabilize existing residents	2020	2024	Affordable Housing Homeless Non-Housing Community Development		Housing instability, including homelessness Need for safe, accessible homes and facilities	CDBG: \$566,422.16 NSP1: \$275,000	Homeowner Housing Rehabilitated: 8 Household Housing Unit – Lakewood; 15 Household Housing Unit - RTSS Buildings Demolished: 3 Buildings
2	Increase rental and homeownership opportunities	2020	2024	Affordable Housing Public Housing		Affordable rental and homeowner opportunities	CDBG: \$0	
3	Prevent and reduce homelessness	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs		Housing instability, including homelessness Need for accessible, culturally competent services	CDBG: \$80,000	Public service activities other than LMI Housing Benefit: 25 Persons Assisted Homelessness Prevention: 25 Persons Assisted
4	Need of accessible, culturally competent services	2020	2024	Homeless Non-Housing Community Development		Housing instability, including homelessness Need for accessible, culturally competent services	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

Table 6 – Goals Summary

Goal Description

1	Goal Name	Stabilize existing residents
	Goal Description	Funding provides support of the stabilization of residents experiencing homelessness or displacement pressure. Activities include the creation of new or maintenance of existing affordable housing stock for low- and moderate-income homeowners and the elimination of slums and blight through the demolition and redevelopment of blighted properties.
2	Goal Name	Increase rental and homeownership opportunities
	Goal Description	Projects in support of rental and homeownership opportunities include activities to create new homeownership opportunities for low- and moderate-income households through the construction of new, affordable single-family housing units, and through maintenance of rental housing opportunities for low- and moderate-income households.
3	Goal Name	Prevent and reduce homelessness
	Goal Description	Funding provides for services engaged in the reduction and prevention of homelessness through the provision of emergency assistance payments to low- and moderate-income households, with a focus on the elderly, disabled, and minority populations, and through relocation assistance for households displaced through no fault of their own.
4	Goal Name	Need of accessible, culturally competent services
	Goal Description	Provides for increased access to culturally competent services for low- and moderate-income individuals with emphasis on extremely low-income individuals, persons of color, immigrants, and the elderly. Activities include fair housing counseling aimed at those households disproportionately impacted by the lingering effects of the coronavirus pandemic. Assistance is anticipated to be provided through CDBG Administrative activities focusing on fair housing education/outreach, and landlord tenant education, and as such, will not be able to be reported as clients served in IDIS due to CDBG Administration reporting requirements. Lakewood will report clients served for this goal in text only in annual Consolidated Annual Performance Evaluation Reports (CAPER).

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City of Lakewood will aim to implement its federal funds in 2023 to accomplish the following goals and corresponding activities:

- **Stabilize existing residents** – Through funds for owner-occupied housing rehabilitation and renovation programs to maintain existing affordability, and through the removal of slums and blight by addressing and demolishing dangerous structures.
- **Increase diverse rental and homeownership opportunities** – Providing homeownership opportunities to low- and moderate-income families through the construction of new affordable housing.
- **Prevent and reduce homelessness** – Funding provides for emergency assistance payments to low- and moderate-income households, with a focus on the elderly, disabled, and minority populations disproportionately impacted by the coronavirus pandemic, and through relocation assistance for households displaced through no fault of their own.
- **Increase availability of accessible, culturally competent services** – Through funds for fair housing activities designed to assist low- and moderate-income households maintain housing access and affordability, and provide landlord tenant education and outreach.

The projects listed and described in this plan represent the proposed use of funds for the FY 2023 CDBG program.

#	Project Name
1	Administration
2	CDBG Administration of HOME Housing Services
3	Major Home Repair Program
4	Rebuilding Together South Sound Homeowner Rehabilitation
5	CDBG Emergency Assistance Payments
6	Emergency Assistance for Displaced Residents
7	NSP1 Abatement Program

Table 7 – Project Information

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

Funding in FY 2023 will primarily focus on the need to address housing instability, including homelessness; the need to increase diverse rental and homeownership opportunities; and the need to

expand accessible, culturally competent services to low- and moderate-income households. Funding priorities were established as part of the City's 5-YR 2020-2024 Consolidated Plan and continue to be evaluated with each subsequent Annual Action Plan. Allocation priorities are identified through input from community partners and neighboring entitlement communities, elected leaders, Community Services Advisory Board members, and public input throughout the process. When allocating CDBG and HOME funds, the City evaluates community need, the ability of a project to leverage partnerships and other non-federal funding streams, project impact, and the ability to complete a project within the requirements of the 5-YR Consolidated Plan goals and objectives.

With Lakewood's average home sales price reported at \$432,500 (Redfin, January 31, 2023) and a median rent of \$1,495 (Zillow, February 20, 2023), many low- and moderate-income families are struggling to keep up. This is of special significance when looking at Lakewood's median household income of \$60,534 (28% less than WA State average of \$84,247) and the fact that 13.6% of Lakewood's population is living at or below the poverty line (nearly 1.4 times the rate of WA State rate of 9.9%). With housing and rent prices continuing to increase, many of Lakewood's households are seemingly living one missed payment away from homelessness, with 40.2% of total households being considered cost-burdened (paying 30 percent or more of income for housing expenses) and 16.6% of total households being considered extremely cost-burdened (paying 50 percent or more of income for housing expenses). A deeper look into these numbers reveals that more than half (52.2%) of renter households are cost-burdened and nearly a quarter (23.4%) are extremely cost-burdened. As housing costs continue to outpace income growth, especially for those who are retired or on fixed incomes, the need to develop affordable housing is something all communities are being forced to balance with ever-dwindling resources.

Activities to be carried out in FY 2023 will include the funding of housing rehabilitation programs aimed at assisting low- and moderate-income households with housing repairs and renovations they may not otherwise be able to afford through conventional financing options; development of new affordable homeownership opportunities and the long-term wealth-building opportunities these programs afford low- and moderate-income households; providing housing stability and homelessness prevention through the provision of emergency assistance payments to low- and moderate-income households, with a focus on cost-burdened, elderly, disabled, and minority populations, and through relocation assistance for families displaced through no fault of their own; reduction of slums and blight in low-income neighborhoods with the demolition and redevelopment of dangerous buildings; fair housing activities focusing on housing inequities often borne by minority and low-income households; and finally, funding in support of the development of new homeownership and rental housing opportunities for low-income households.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration
	Target Area	
	Goals Supported	Need of accessible, culturally competent services
	Needs Addressed	Need for accessible, culturally competent services
	Funding	CDBG: \$108,492.80
	Description	Administration to implement and manage the Consolidated Plan funds. Activities include providing fair housing and landlord tenant outreach and education.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Administration funds are anticipated to be expended in support of general administration activities to administer the 2023 Annual Action Plan, including funding for fair housing activities in support of 40 low- and moderate-income individuals. Fair housing activities will not be able to be reported as clients served in IDIS due to CDBG Administration reporting requirements. Lakewood will report clients served for this goal in text only in annual Consolidated Annual Performance Evaluation Reports (CAPER).
	Location Description	
	Planned Activities	Administration funds are anticipated to be expended in support of general administration activities to administer the 2023 Annual Action Plan, including funding for fair housing activities in support of 40 low- and moderate-income individuals.
2	Project Name	CDBG Administration of HOME Housing Services
	Target Area	
	Goals Supported	Increase rental and homeownership opportunities
	Needs Addressed	Affordable rental and homeowner opportunities
	Funding	CDBG: \$10,000
	Description	Program administration and housing services in support of HOME Program.
	Target Date	6/30/2024 – 6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	A total of 25 low- and moderate-income households will be assisted with HOME-funded activities, including the construction of new affordable rental opportunities.
	Location Description	8956 Gravelly Lake Dr. SW
	Planned Activities	Program administration and housing services in support of HOME Program.
3	Project Name	Major Home Repair Program
	Target Area	
	Goals Supported	Stabilize existing residents
	Needs Addressed	Housing instability, including homelessness
	Funding	CDBG: \$352,929.36
	Description	Program provides home repair and/or sewer connection loans to eligible low-income homeowners. Funding for program provided through FY 2023 entitlement funding and revolving loan funds. Activity funding includes revolving loan fund.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	A total of 8 low- and moderate-income households will be assisted with owner-occupied, housing rehabilitation activities.
	Location Description	City-wide
	Planned Activities	The project will provide major home repair/sewer connection loans which include connection of side-sewer to sewer main, decommissioning of septic systems, roofing, removal of architectural barriers, plumbing, electrical, weatherization, major systems replacement/upgrade, and general home repairs for eligible low- and moderate-income homeowners. Program funding includes a total of \$3,958.16 in reprogrammed CDBG funding and \$100,000 in program income.
4	Project Name	Rebuilding Together South Sound Homeowner Rehabilitation
	Target Area	
	Goals Supported	Stabilize existing residents
	Needs Addressed	Housing instability, including homelessness

	Funding	CDBG: \$75,000
	Description	Project will provide funding for the preservation of existing owner-occupied housing units that do not qualify for the City's Major Home Repair program due to credit worthiness, lack of equity, or other program qualifications. The program will provide for small-scale repair and general maintenance for eligible low- and moderate-income homeowners.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	A total of 12 - 15 low- and moderate-income households will be assisted through the rehabilitation of existing owner-occupied housing.
	Location Description	City-wide
	Planned Activities	The project will provide funding for the preservation of existing affordable housing through the rehabilitation of owner-occupied housing units.
5	Project Name	CDBG Emergency Assistance Payments
	Target Area	
	Goals Supported	Stabilize existing residents Prevent and reduce homelessness
	Needs Addressed	Housing instability, including homelessness Need for accessible, culturally competent services
	Funding	CDBG: \$80,000
	Description	Program provides for the provision of emergency assistance payments for basic services such as food, clothing or housing-related expenses to low-income households, with a focus on cost-burdened households, elderly, disabled, and minority populations.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	A total of 40 low- and moderate-income individuals will be assisted through the provision of emergency assistance payments to low-income households, with a focus on cost-burdened households, elderly, disabled, and minority populations.
	Location Description	City-wide

	Planned Activities	Program provides funding for services engaged in the reduction and prevention of homelessness through the provision of emergency assistance payments to low- and moderate-income households, with focus on cost burdened households, elderly, disabled, and minority populations continuing to be disproportionately impacted.
6	Project Name	Emergency Assistance for Displaced Residents
	Target Area	
	Goals Supported	Stabilize existing residents Prevent and reduce homelessness
	Needs Addressed	Housing instability, including homelessness Need for safe, accessible homes and facilities
	Funding	CDBG: \$20,000
	Description	Program provides emergency relocation assistance to eligible low-income households displaced through no fault of their own during building and code enforcement closures, fires, redevelopment, and other incidences resulting in homelessness.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	10 individuals will be assisted with emergency relocation assistance for persons displaced due to no fault of their own.
7	Project Name	NSP1 Abatement Program
	Target Area	
	Goals Supported	Stabilize existing residents
	Needs Addressed	Housing instability, including homelessness Need for safe, accessible homes and facilities
	Funding	NSP1: \$275,000
	Description	Provides funding for the abatement of dangerous buildings that have been foreclosed, abandoned or are vacant. Activities funded with revolving loan fund.
	Target Date	6/30/2024

Estimate the number and type of families that will benefit from the proposed activities	The City of Lakewood anticipates it will demolish a total of 3 dangerous buildings located in low-income block groups in FY 2023 with the NSP1 Abatement Fund.
Location Description	City-wide
Planned Activities	Provides funding for the abatement of dangerous buildings that have been foreclosed, abandoned or are vacant. Funding for the program is provided through revolving loan funds generated from previous NSP1 abatement activities. Program funding includes a total of \$275,000 in program income to be used for similar RLF activities.

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

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

In targeting CDBG and HOME funds, the City has typically looked to block groups with at least 51% low- and moderate-income populations as many of Lakewood’s minority and ethnic populations continue to be concentrated in these areas. Many of these block groups tend to have large concentrations of older housing stock suffering from a lack of routine maintenance and infrastructure that is either inadequate or are outdated in accordance with current development standards.

In 2023, Lakewood’s fourth year of the 5-YR Consolidated Plan (2020-2024), CDBG funding prioritization will focus on increasing and preserving affordable housing stock through owner-occupied housing rehabilitation; the prevention and reduction of homelessness through emergency assistance payments to low- and moderate-income households, with a focus on cost-burdened households, elderly, disabled, and minority populations, and through relocation assistance for households displaced through no fault of their own; neighborhood revitalization through the removal of blighted properties; and improved access to fair housing counseling services. HOME funding in FY 2023 will support the development of new affordable homeownership and rental housing opportunities.

The City intends to target households living in Census Tracts 718.05, 718.06, 718.07, 718.08 and 720.00 for its Major Home Repair, Rebuilding Together South Sound Homeowner Rehabilitation, and CDBG Emergency Assistance Payment and Emergency Assistance for Displaced Residents programs, which assist with the preservation of housing stability and prevention of homelessness through owner-occupied housing repairs, and relocation and emergency assistance payments for basic services such as food, clothing or housing-related expenses to low-income households.

For all other funding, the City has not identified specific targeted areas; programs are open to eligible low- and moderate-income individuals citywide.

Geographic Distribution

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

N/A

Discussion

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

Introduction

As identified in the 5-YR Consolidated Plan (2020-2024), low- and fixed-incomes, high housing costs, overcrowding, homelessness, and aging all present challenges to Lakewood residents, which can have negative impacts on their quality of life. Most common among these housing problems for Lakewood residents is housing affordability, as measured through cost burdens. Renters in particular, continue to face more acute cost burdens than do homeowners, with 52.2% of Lakewood's rental households considered cost-burdened compared to 25.5% of owner households. Those households facing extreme cost burden, or where at least 50 percent of total household income is used for housing expenses, again show renters disproportionately impacted with 23.4% considered extremely cost-burdened compared to just 7.9% of owner households. Renter-occupied households in Lakewood are twice as likely to be cost-burdened and three times more likely to be extremely cost burdened than are owner-occupied households. In all, 40.2% of Lakewood households are considered cost-burdened and 16.6% are

considered extremely cost-burdened (2017-21 American Community Survey).

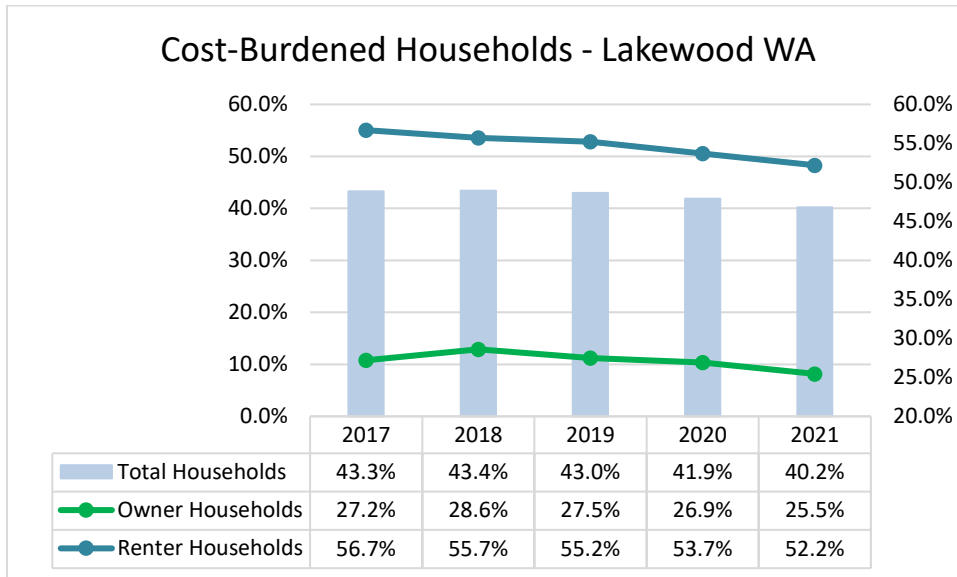


Table 5 – Cost-Burdened Households- Lakewood WA

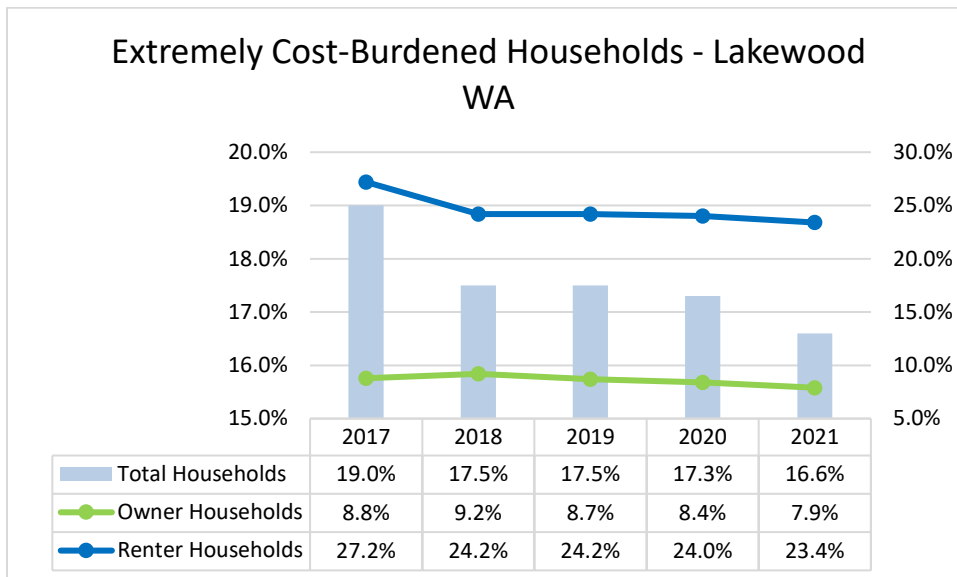


Table 6 – Extremely Cost-Burdened Households- Lakewood WA

Lakewood’s housing demographics have remained constant over the recent ten years with a slight trend favoring renter-occupied (56.1%) to owner-occupied (43.9%) (2017-21 American Community Survey). These numbers are reflected in the opposite when looking at Pierce County with a 65.4% owner-occupied rate, Washington at 64% owner-occupied, and that of the United States at 64.6% owner-

occupied and 35.4% renter-occupied.

Although household incomes have seen increases in recent years, Lakewood's median income of \$60,534 continues a trend of lagging behind that of the county (\$85,866), Washington (\$84,247), and the United States (\$69,021). Of additional concern is Lakewood's apparent concentration of households living at or below the poverty rate, currently 13.6% of households, much higher than that of the county at 8%, Washington at 9.95%, and the United States at 11% (2017-21 American Community Survey). The disparate impacts of households living in poverty come into focus when looking at Black, Indigenous and People of Color (BIPOC) households. For Lakewood, Black or African American households experience poverty at a rate of 17.4%, Hispanic or Latino households 15%, and American Indian and Alaskan Native households experience poverty at an alarming rate of 43.6% (an increase of 6.7 percentage points from 2020). These numbers remain in stark contrast when considering Lakewood's White only population, which makes up 54.9% of Lakewood's total population, who experience poverty at a rate of 13.3%.

While Lakewood's median income saw a rise in 2021 to \$60,534, a 27% increase over the most recent five-year period, at the same time median house values rose 42.5% to \$331,500 and median rents increased 27.8% over the same period to \$1,183. Even though median incomes continue to see improvement in Lakewood, they are being outstripped by even higher escalating housing related expenses, leaving little relief for low-income households who have been traditionally cost-burdened. This becomes of special concern when looking at households experiencing poverty who have children under the age of eighteen- 15.2% of all families with related children under 18 years old live in poverty, and 30.8% of single-female households with related children under 18 years old live in poverty. This number increases to 47% of single-female households with multiple related children under 5 years old and between 5 and 17 years old. Elderly households and those on fixed incomes also remain a concern as 12.1% of households 60 and older and 9.7% of households 65 and older are considered to be living in poverty. Additionally, 9.5% of veterans have been identified as living in poverty in the last 12 months (2017-21 American Community Survey).

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

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

construction of affordable housing.

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

Discussion

For the majority of households, economic opportunity and familial wealth are tied directly to homeownership. Through homeownership a household maintains an asset that most typically increases in valuation over generations causing the accumulation of wealth, provides various access points to economic leverage, serves as a hedge against rising housing costs, provides various tax benefits, and realizes a lower taxation rate than other forms of investments. It is through this historical wealth building opportunity that most households have grown and passed along wealth. Unfortunately, many black and minority populations have been shut out of this system through various institutional and de facto discriminatory practices: from slavery, segregation, and disenfranchisement of Black Americans, to expropriation of land, forced relocation, and anti-immigration policies against Native American and Hispanic populations. Historically, the benefits of homeownership have not been shared equally across the race spectrum. A recent U.S. Treasury report noted that in the second quarter of 2022, homeownership rates for white households held at 75 percent, compared to 45 percent for Black households, 48 percent for Hispanic households, and 57 percent for non-Hispanic households of any other race (U.S Treasury, *Racial Differences in Economic Security: Housing*, November 4, 2022). The study found these gaps in homeownership have remained relatively unchanged over the most recent three decades, and in fact, the Black-White gap in homeownership rate in 2020 remained the same as in 1970. Additionally, for those Black households that do maintain homeownership, the average Black household's home value is 2.5 times lower than the average white household's value; again, the same as it was in 1970. Median household net worth of white households was nearly 5 times that of Black households and 8 times that of Hispanic households.

With homeownership being the primary source for wealth for most Americans today, it is important that this benefit be extended equally to all. Homeownership, beyond simple wealth-building, provides long-lasting opportunities both socially and economically. For instance, studies have shown that as the wealth of a household grows, so too does the likelihood that the children of that household will enroll in and graduate from college, thus increasing lifetime earning potential. When looking at college graduation rates where in 2021, 41.9% of white adults had earned a bachelor's degree compared to 28.1% for Black and 20.6% for Hispanic adults (U.S. Census Bureau, *Educational Attainment in the United*

States: 2021, February 24, 2022), one can make a direct correlation between homeownership rates and college graduation. Additionally, health and psychological disparities for Black and Hispanic households include higher rates of child abuse, lead exposure, obesity in childhood, and chronic illness in adulthood than white Americans (U.S Treasury, *Racial Differences in Economic Security: Housing*, November 4, 2022).

As a majority of Lakewood's population live in rental households, the steady increase in the cost of rents year-over-year remains of concern, especially for those low- and moderate-income Lakewood households who are already cost-burdened. With the current median monthly rent now standing at \$1,495 (Zillow, February 23, 2023), housing cost is easily outstripping income growth, especially for low- and moderate-income households. These issues of rising housing costs relative to household incomes become strikingly apparent when looking at the percentages of Lakewood households where monthly housing cost exceeds 35 percent of household income- 23.7% for households with a mortgage and 41.3% for households who rent (2017-21 American Community Survey).

With strong increases in property valuation and land costs, housing development costs have continued to push private investment into market rate housing and away from affordable housing. Additionally, as house valuations have risen, single-family homes once dedicated to rental uses are seeing increased pressure to sell and realize profits, ultimately turning them from rental to owner-occupied. As investment shifts toward higher return market-rate housing and more and more housing units are converted from rental to homeowner use, many communities are looking for creative ways to meet the increasing demand for affordable housing. Unfortunately, with rapidly escalating property valuations and the ever-competitive nature of financing affordable housing vs. market rate housing, affordable housing development has become increasingly difficult to develop, especially within the time horizons necessary to keep up with growing demand.

Of additional concern for the future of affordable housing development are the outdated and lagging regulatory policies of the HOME and CDBG programs. In today's frenzied economy, with property valuations appreciating almost daily and construction costs spiraling out of sight, the very programs designed to assist communities in the support and development of affordable housing are beginning to hinder that development. Certain regulations like the restriction of investment in homes whose value exceeds that of 95% of median purchase price valuations, outdated per-unit investment subsidy limits, onerous environmental regulations, and a restriction of CDBG investments in the constructing of new housing units unless conducted by a Community Based Development Organization. As economies change around the globe, regulatory policies need to be evaluated and updated to keep pace with the changing economic environment.

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

Introduction

Actions planned to address obstacles to meeting underserved needs

In 2023, Lakewood will continue to focus its efforts on stabilizing existing residents through homeowner rehabilitation programs and the revitalization of neighborhoods through the removal and redevelopment of blighted properties. Additional programs will support low- and moderate-income households struggling with housing affordability to ensure those households do not end up experiencing homelessness resulting from discriminatory practices, fires, building enforcement, redevelopment activities, and other lingering effects of the coronavirus pandemic. Fair housing counseling services will focus on ameliorating housing inequities often borne by minority and low-income households.

Efforts to support affordable rental and homeownership opportunities will continue in to 2023-24 with support of new affordable rental opportunities for low-income households, and continued development by Habitat for Humanity of new affordable homeownership opportunities for low- and moderate-income homebuyers located along Boat St. SW. As housing and rental prices have continued to rise, the need for affordable housing grows stronger still, especially for low-income and minority populations.

Additional actions to address the needs of Lakewood's underserved population are addressed through the ongoing 1% allocation from the City's general fund; strategic priorities include emotional supports and youth programs, housing assistance and homelessness services, crisis stabilization and advocacy, access to health & behavioral health, and access to food. For 2023, the City has allocated \$457,500 in general fund dollars in support of these programs.

In March 2021, the City received \$13,766,236 in American Rescue Plan Act (ARPA) funding to aid in the recovery from the budgetary, public health, economic, and financial impacts of the COVID-19 pandemic. To date, the City allocated in excess of \$1.2 million for various youth programs, \$3 million in support of local food banks, in excess of \$4.1 million for housing and homelessness programs, \$1.9 million for public health and safety, nearly \$600,000 for workforce development, and \$1.3 million in administration and city hall upgrades.

Actions planned to foster and maintain affordable housing

Lakewood recognizes the importance affordable housing and homeownership play in building vibrant communities and the direct connection they afford low-income households in wealth-building opportunities. In 2023, the City looks to continue its partnership with LASA and Habitat for Humanity in developing new affordable housing. Habitat has acquired multiple vacant, abandoned and blighted

properties in Lakewood and is in process of redeveloping those properties to construct eleven new homes for low-income homebuyers; construction is anticipated to be completed in late 2024. LASA has also acquired multiple properties around their current facility with the intention to provide increased access to services and the development of new affordable rental opportunities for low-income households. LASA intends to develop its project in phases with the initial phase, improved access to services, to be completed in 2023, with rental housing development to be completed in 2025.

Support for existing affordable owner-occupied housing will continue through Major Home Repair and HOME Housing Rehabilitation, while single-family and multifamily housing development is supported and encouraged through Lakewood's HOME Affordable Housing Fund and zoning density bonuses offered to developers of affordable housing.

Additional efforts in support of housing stability come from an annual 0.0073% sales and use tax (SHB-1406) to be used to provide financing for the development and maintenance of affordable housing for households at or below 60% of area median income. The fund has a current balance of \$285,185 with additional revenue of approximately \$95,000 to be received annually. Over the next 20 years, the City anticipates an estimated \$1.95 million dollars to be raised in support of affordable and supportive housing development.

Rental habitability and affordability remain a priority for the City. With approximately 56.1 percent of Lakewood's housing stock being rental, and 43 percent of Lakewood's housing stock constructed prior to 1960, the importance of maintain these units remains of paramount importance. In 2017, the City began its Rental Housing Safety Program (RHSP) requiring all residential rental properties (apartments, single-family homes, duplexes, etc.) within the Lakewood city limit be registered on an annual basis and maintain specific life and safety standards for those properties. Since substandard housing disproportionately affects the poor, working class families, seniors, the disabled, and persons who suffer from chronic illness, it is the aim of the RHSP to eliminate all substandard rental housing in Lakewood and improve the quality of life for all Lakewood residents. Since the program's inception, the City has inspected approximately 99 percent of its rental properties and has seen substantial improvements in both the quality and condition of many of the City's substandard rental properties.

Actions planned to reduce lead-based paint hazards

Consistent with Title X of the Housing and Community Development Act of 1992, Lakewood provides information on lead-safe practices to owners of all properties receiving up to \$5,000 of federal assistance. If work on painted surfaces is involved in properties constructed prior to 1978, the presence of lead is assumed, and safe work practices are followed if testing is not conducted.

In addition to the above, homes with repairs in excess of \$5,000 in federally funded rehabilitation assistance are assessed for risk (completed by a certified Lead Based Paint firm) or are presumed to have lead. If surfaces to be disturbed are determined to contain lead, interim controls are exercised,

occupants notified, and clearance testing performed by an EPA-certified firm. Properties constructed prior to 1978 and acquired with federal funds are inspected for hazards and acquired rental properties are inspected periodically.

With approximately 75% of Lakewood's 27,370 housing units being built prior to 1980, there exists the potential for some 20,000 housing units to contain lead-based paint hazards. To inform the community of the hazards of lead-based paint, the City offers copies of the EPA's "Protect Your Family from Lead in Your Home" and HUD's "Renovate Right" pamphlets at City Hall and provides copies of these pamphlets to all housing repair program applicants. As part of the City's single and multifamily housing programs, XRF paint inspections and Risk Assessments are conducted, lead-safe work is conducted by Washington State certified RRP renovation contractors, abatement work is conducted by certified abatement contractors, and clearance testing of all disturbed surfaces is performed by certified Risk Assessors.

The City conducts lead paint inspections on all pre-1978 properties where persons are relocated to with the Emergency Assistance for Displaced Residents and where homeownership assistance is provided for existing housing. Risk assessments are to be conducted on all pre-1978 homes served by housing repair programs where painted surfaces are to be disturbed as part of the scope of repairs. When completed, all homes will be free of lead-based paint hazards.

Actions planned to reduce the number of poverty-level families

The goals in the Strategic Plan have the capacity to reduce the number of households living in poverty. The goals emphasize stable and affordable housing and services as a means to address poverty and high-quality infrastructure as a way to revitalize communities.

For instance, the goal to address housing instability among residents, including homelessness includes projects which address long-term housing stability through housing rehabilitation programs designed to address housing repairs and renovations vital to maintaining existing affordable housing stock. Housing improvements also provide for accessibility and energy efficiency improvements providing for safer and more economical housing. Funding used to acquire blighted properties and replace them with new homeownership opportunities revitalizes neighborhoods, increases the value of neighboring properties, and creates ownership avenues designed to build household wealth and move families from poverty.

The goal to address the limited supply of diverse rental and homeownership opportunities includes funding for the construction of new, safe and affordable housing units for low-income homebuyers. By subsidizing project development costs, the City is able to effectively decrease the share of total income a family commits for housing cost, allowing the household to use those extra funds to pay down short-term debt and pay for other necessities, such as transportation, healthcare, and food, or save for the future.

To address the need for accessible, culturally competent services, programs will focus on the lingering financial impacts the coronavirus pandemic has had on low- and moderate-income households. Fair

housing counseling services will focus on housing inequities often borne by minority and low-income households. In 2023, \$100,000 will be allocated in support of homelessness prevention through emergency assistance payments to low- and moderate-income households, with a focus on the elderly, disabled, and minority populations, and through relocation assistance for households displaced through no fault of their own.

Additional effort to reduce the number of poverty-level families include funding through the 1% human services allocation which provides a broad spectrum of services including, supportive and emergency services, human services programs targeting basic human needs, homelessness intervention and prevention, fair housing assistance, crisis stabilization and advocacy, youth programs, access to health and behavioral services, access to food, and activities to increase self-sufficiency (e.g., workforce training, employment readiness, and education). For 2023, the City has allocated \$457,500 in general fund dollars in support of these programs.

Actions planned to develop institutional structure

Lakewood, Tacoma, and Pierce County have a long history of working closely together to coordinate funding activities and ensure funding strategies don't overlap or conflict. This is especially true today, as all three jurisdictions have been working towards regional coordination on anti-poverty strategies, affordable housing strategies, and homelessness initiatives. These initiatives aim to increase the supply of affordable housing (both rental and homeownership), lower the overall cost of housing for residents, create access to financial assistance and services, increase the earning potential of low-income households, reduce or eliminate the time a family is homeless, and create pathways to build wealth and assets. Funding allocations and recommendations for many local projects are reviewed and approved jointly.

Both Tacoma and Lakewood are represented on the Tacoma/Pierce County Affordable Housing Consortium to work on issues of affordable housing, including state-level policies and programs to increase resources and opportunities to address local housing needs. Tacoma and Lakewood participate in a multicounty planning system (Puget Sound Regional Council) that looks at regional growth and economic development, as well as equal access to opportunities. The City of Lakewood is also a founding member of the South Sound Housing Affordability Partners (SSHAP), a voluntary collaboration among 14 governments, whose goal is to provide a regional approach to preserve affordable, attainable, and accessible housing throughout Pierce County.

On a local level, Lakewood continues to coordinate federal funding opportunities and general fund expenditures through the Community Services Advisory Board (CSAB). The CSAB is tasked with policymaking and general funding recommendation authority as they relate to community development and human services activities citywide. Board responsibilities include facilitating the cooperation and coordination of human services and Consolidated Plan activities, holding public hearings to receive input on community development and human service's needs, developing policy guidance and program

evaluation criteria, and making funding recommendations.

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

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

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

City of Lakewood staff routinely coordinate with City of Tacoma, as part of the HOME Consortium, and participate in regional efforts coordinating planning efforts and service delivery. The Cities participate in the Tacoma/Lakewood/Pierce County Continuum of Care and are active in the Tacoma Pierce County Affordable Housing Consortium, the Economic Development Board for Tacoma-Pierce County, the Pierce County Human Services Coalition and other public entities and associations that set priorities for use of resources in the region, set goals, and measure progress in meeting those goals. Lakewood staff participate in monthly meetings with service providers and coordinate on the development of plans and strategies. Coordination with public and assisted housing providers along with governmental agencies for health, mental health, and other services focus on economic development, transportation, public services, special needs, homelessness, and housing. As the need for affordable housing and services continues to increase, the Cities of Tacoma and Lakewood, Pierce County, and the Puget Sound Regional Council continue to collaborate on long-term priorities to leverage limited funding to meet the needs of the community.

Additional coordination efforts with housing and social service agencies involves funding through the City's 1% human services allocation. This fund targets programs that provide low-income housing and homelessness assistance, crisis stabilization and advocacy, emotional supports & youth programs, access to health and behavioral services, and access to food. Through the City's annual allocation process, relationships have been maintained with providers of services such as, Tacoma Rescue Mission, Emergency Food Network, Community Healthcare, Greater Lakes Mental Healthcare, YWCA & YMCA, LASA, Rebuilding Together South Sound, Asian Pacific Cultural Center, Oasis Youth Center, Multicultural Child and Family Hope Center, Nourish Pierce County, St. Leo's Food Connection, Pierce County AIDS Foundation, and other services providers offering programs to low and moderate income households throughout the County. Collaboration continues with both the Pierce County Housing Authority and the Tacoma Housing Authority on the expansion of safe, decent, affordable housing options for low-income

citizens.

Discussion

Program Specific Requirements

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

Introduction

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	375,000
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:	375,000

Other CDBG Requirements

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

Discussion

Attachments

(Insert SF 424 and Certifications)