

## I. Consolidated Plan: Program Background and Structure

**A. Introduction.** The Snohomish County Urban County Consortium (Consortium) receives federal housing and community development funds annually from the U.S. Department of Housing and Urban Development (HUD) on an entitlement basis. (These funds are sometimes referred to as “formula funds” because they are allocated by HUD based on a formula and are referenced as such at several points in this document.) The 2010-2014 Housing and Community Development Consolidated Plan (Consolidated Plan) is a five-year planning document required by HUD to be submitted by jurisdictions in order to receive these funds. These funds include:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)
- Emergency Shelter Grant (ESG)

The Consolidated Plan regulations also covers the Supportive Housing Program (SHP) and the Shelter Plus Care Program (S+C), also administered by HUD.

**B. Purpose.** The Consolidated Plan provides a framework which guides local jurisdictions in addressing priority housing and community development needs. It identifies the local community’s affordable housing and non-housing community development needs (public facilities, infrastructure, public services, and economic development) and determines priorities, strategies and objectives to guide investment of CDBG, HOME, and ESG funds over a five-year period to help meet the identified needs. Snohomish County currently receives approximately \$3.1 million in CDBG funds, \$2.3 million in HOME funds, and \$135,000 in ESG funds annually. In addition, both the CDBG and HOME programs are currently estimated to generate approximately \$180,000 minimum each in program income annually. In addition, for each year of the Consolidated Plan, an Annual Action Plan is developed. The Annual Action Plan is required to include the Consortium’s spending plan for the next program year and establish that the allocations are responsive to the strategies and objectives set forth in the Consolidated Plan. It includes a description of the specific activities to be funded and the amount and type of funding awarded to each activity.

The 2010-2014 Consolidated Plan has been prepared to meet these requirements and will be in effect from July 1, 2010 through June 30, 2015. (Snohomish County operates its federal entitlement grant programs on a July 1 – June 30 program year). The 2010 Annual Action Plan included with this Consolidated Plan has also been prepared to meet these requirements and covers the 2010 program year commencing July 1, 2010 and ending on June 30, 2011. Annual Action Plans for the 2011, 2012, 2013, and 2014 program years will be developed in accord with the citizen

participation plan and enacted as annual amendments to this Consolidated Plan.

- C. Document Organization.** This Consolidated Plan is subdivided into three sections. This, the first section, lays out the purposes of the plan and discusses the process employed in producing the Consolidated Plan and Annual Action Plan. The second section, the 2010-2014 Strategic Plan, presents data on and analysis of the County's housing and non-housing community development needs. It also sets forth the strategies and objectives developed for addressing the priority needs identified for the 2010-2014 time period. The third section, the program year 2010 Annual Action Plan, provides the Consortium's proposed spending plan for CDBG, HOME and ESG funds for the 2010 program year, including the specific activities proposed for funding and how they are consistent with the Consolidated Plan strategies and objectives.

Because all aspects of the 2010-2014 Consolidated Plan as well as the program year 2010 Action Plan were developed together, the processes and procedures recounted in this section (e.g., public participation, interagency consultation and technical assistance) apply in common to both elements of the document. Where necessary, initiatives that apply to specific aspects of the process are clearly identified.

#### **D. HUD Statutory Program Goals, Beneficiaries, and Outcomes**

*HUD Statutory Program Goals:* HUD has established statutory program goals to guide the use of federal housing and community development funds and consolidated planning for these funds. The three basic goals are all intended to improve the lives of low- and moderate income persons and include: providing decent housing, providing a suitable living environment, and providing expanded economic opportunities.

The priorities the Consortium develops for use of CDBG, HOME, and ESG funds must be consistent with these goals. The priorities, strategies and objectives in the 2010-2014 Consolidated Plan are consistent with these goals and will assist the Consortium in meeting local community needs by:

- Maintaining and increasing decent housing that is affordable and accessible to low- and moderate-income households across the housing continuum. This includes the housing needs of renters, owners, and first-time homebuyers. It also includes the needs of persons experiencing homelessness or at risk of homelessness, and persons with special needs and other low- and moderate-income households.

- Supporting a range of community facility and infrastructure projects that will enhance the safety and livability of neighborhoods and benefit low- and moderate-income households, including persons experiencing homelessness or at risk of homelessness, persons with special needs, and other low- and moderate-income households.
- Supporting a range of public service projects that address the basic living, health, safety, and well-being needs of low- and moderate-income persons. This includes needs of youth, seniors, persons experiencing homelessness or at risk of homelessness, persons with special needs and other low- and moderate-income persons. It also includes projects that provide housing with supportive services, services that assist persons to live independently, services that encourage self-sufficiency, and other services.
- Continuing to operate the CDBG float loan program and continuing exploration of possible use of the CDBG Section 108 loan program.

*HUD Program Performance Objectives/Outcomes.* Based on the statutory program goals, HUD has developed a performance objective/outcome reporting system for projects funded under the CDBG, HOME, and ESG programs. The three objectives are decent housing, suitable living environment, and economic opportunity. The three outcomes are availability/accessibility, affordability, and sustainability. Each project funded must meet report on one of the objectives and one of the outcomes. These objectives/outcomes are incorporated into the priorities, strategies and objectives contained in the 2010-2014 Consolidated Plan and the objective/outcome for each project funded for 2010 is identified in the 2010 Annual Action Plan, where applicable.

*Program Beneficiaries.* The CDBG, HOME, and ESG program must be used to benefit low- and moderate- income households (households with incomes at or below 80% of the area median income). Under CDBG, at least 51% of persons served by the program must be low- and moderate-income. Under HOME, all of the persons served by the program must be low- and moderate-income. Under ESG, persons served must be homeless or at risk of homelessness. Many of the programs funded serve households with lower incomes (households at or below 50% or 30% of the area median income). Table 1 shows the maximum income levels in each income category for households of different sizes for 2009. These income levels are determined annually by HUD.

**Table 1**

<b>2009 HUD Income Limits</b>			
<b>Household Size</b>	<b>Extremely Low-Income 30% AMI</b>	<b>Low-Income 50% AMI</b>	<b>Moderate-Income 80% AMI</b>
1	\$17,700	\$29,500	\$44,800
2	\$20,250	\$33,700	\$51,200
3	\$22,750	\$37,950	\$57,600
4	\$25,300	\$42,150	\$64,000
5	\$27,300	\$45,500	\$69,100
6	\$29,350	\$48,900	\$74,250
7	\$31,350	\$52,250	\$79,350
8	\$33,400	\$55,650	\$84,500

For CDBG, HUD presumes that certain categories of persons are predominately low- and moderate-income. These categories include: abused children, battered spouses, elderly persons, homeless persons, illiterate adults, persons living with HIV/AIDS, migrant farm workers, and severely disabled adults. Elderly beneficiaries are defined as those 62 years of age and older.

- E. **Snohomish County Consortium.** The Snohomish County Consortium is a partnership between Snohomish County and most of the cities and towns within the county. This partnership allows the Consortium, as an Urban County, to receive funding each year as a formula grant under the federal programs referenced above. The Consortium is established through an interlocal agreement between the County and each city and town in the Consortium.

For CDBG and ESG, the Consortium includes the County and the 18 cities and towns within the County and covers both the incorporated and unincorporated areas. It does not include the City of Bothell or the City of Everett. The City of Bothell is split by the County line and partners with King County. The City of Everett receives CDBG funds directly from HUD and its share of ESG funds is included in the balance of state funds administered by the Washington State Department of Commerce. For HOME funds, the Consortium includes the County and the same 18 cities and towns and also includes the City of Everett.

- F. **Lead Agency.** Snohomish County is the applicant and official grant recipient (lead agency) which contracts with HUD for CDBG, HOME and ESG funds on behalf of the Snohomish County Consortium. In this capacity, Snohomish County is responsible for the overall administration, planning, monitoring, and reporting requirements for these programs on behalf of the Snohomish County Consortium. Snohomish County develops the required plans through

a consultation and citizen participation process which provides for input from Consortium members, various agencies, and citizens.

**G. Institutional Structure.** The institutional structure through which the Consortium carries out its Consolidated Plan is broad-based and includes County government and staff, local governments, public agencies, and private non-profit organizations (including faith-based organizations.)

The County acts through a five-member elected County Council to establish policies governing use of HUD funds and to select and contract with project sponsors (subgrantees) to carry out housing and community development activities. The Consortium's nine-member Housing and Community Development Policy Advisory Board (PAB) assists the County Council in its responsibilities. The PAB's make-up and representation is as follows: the Snohomish County Executive (or his/her designee); three members of the Snohomish County Council; one Mayor or Council representative selected by all participating units of local government whose population base, independently, is 10,000 or greater; one Mayor or Council representative selected by participating units of local government whose population base, independently, is between 3,000 and 10,000; one Mayor or Council representative selected by all participating units of local government whose population base, independently, is less than 3,000; one Mayor or Council representative selected at large by all participating units of local government; and one Snohomish County citizen selected and appointed by the other eight members of the PAB. Each member of the PAB has one unweighted vote; the citizen member selected by the PAB serves as the chairperson and votes only in cases of ties. "Participating unit of local government" means a signatory to the "Snohomish County Housing and Community Development Block Grant Interlocal Cooperation Agreement." The agreement sets forth the membership of the consortium and governs the actions of the PAB. It is renewed every three years. Pursuant to the interlocal agreement and its own bylaws, the PAB holds public hearings, coordinates public information and review processes and makes recommendations to the County Council on matters related to HUD funds.

The interlocal agreement also establishes a Technical Advisory Committee (TAC) to assist the PAB with assessing applications submitted for funding. The TAC reviews project proposals on such issues as community need, conformance with adopted plans and priorities, the nature and extent of benefit, financial or technical feasibility, and/or other factors bearing upon the merit of proposals competing for funding. The TAC makes recommendations on project selection to the PAB. The TAC has seats for the following representatives: one representative from each participating unit of local government in the Consortium, two representatives of Snohomish County appointed by the Snohomish County Executive, one representative of the Housing Authority of Snohomish County, and eight Snohomish County

residents. The citizen representatives are selected by the PAB through an application process and include two seats representing each of the following groups: low-income persons, persons with disabilities, senior citizens, and minority persons. At least one of the citizen representatives is a homeless or formerly homeless person, or represents such groups. Each TAC member has one unweighted vote.

The Snohomish County Human Services Department (HSD) and the Office of Housing, Homelessness, and Community Development (OHHCD) within the HSD, staffs the PAB and TAC meetings and manages the competitive application process for the HUD formula funds. They are also responsible for contracting, monitoring, and compliance procedures. The County contracts with project sponsors (subgrantees) which are awarded funding to carry out housing and community development activities in the local community to help achieve the goals contained in the Consolidated Plan.

Projects sponsors include units of local government within the Consortium (may also include Snohomish County departments), public agencies, and private non-profit agencies (including faith-based organizations). OHHCD staff provides technical assistance to potential applicants for CDBG, HOME, and ESG funds during the application process and also provides ongoing technical assistance to project sponsors who are allocated funding for projects.

HSD/OHHCD staff attend various local and regional meetings in order to maintain and increase the coordination of activities between the County and other entities working to create suitable living environments, provide decent affordable housing, and create economic opportunities for low-income persons in the community.

A portion of HOME funds are allocated each year to provide operating support to Community Housing Development Organizations in order to build and maintain local capacity to efficiently produce and maintain affordable housing. The County has also provided local housing funds to Impact Capital for a revolving loan fund to provide pre-development loans to develop affordable housing in Snohomish County.

Local capacity to produce affordable housing for persons with disabilities has increased in the past couple of years. An agency based in north King County that serves this population has expanded their service-region to include Snohomish County and has recently sponsored affordable rental housing projects and a homeownership project. Another agency based in Snohomish County that serves this population has recently sponsored an affordable rental housing project. In addition, a local revolving loan fund to assist in development of housing for persons with mental illness or chemical



dependency is currently under development and is anticipated to further strengthen local capacity to develop housing for this population.

Local capacity to provide purchase assistance for first-time homebuyers has also increased in the past couple of years. Three agencies have recently sponsored local homeownership programs which augment the existing homeownership program to serve additional persons. One is the agency referenced above which provides purchase assistance to households where at least one member in the family has a disability. The other two programs will provide purchase assistance to persons participating in the agency's sweat-equity construction program or persons purchasing units in a community land trust project developed by the agency.

Key strengths in the Consortium's institutional structure are the existence of a broad range of project sponsors, local community planning processes particularly around affordable housing and homelessness, and the partnerships between the County, local governments, public agencies, and non-profit organizations to serve the affordable housing and community development needs of low- and moderate-income persons in the community, including persons experiencing homelessness and persons with special needs.

The most significant gap in institutional structure is that local affordable housing and community development needs far outstrip the amount of resources available to meet this need. In order to help meet this gap, the County continues to administer the Snohomish County Affordable Housing Trust Fund (AHTF) initiated in 2003 and the Snohomish County Ending Homelessness Program (EHP) initiated in 2007 which generate additional local revenues for affordable housing and homeless projects. In addition, the Snohomish County Council recently adopted a local sales tax which will provide additional funding to help meet the needs of persons with mental health and chemical dependency disorders. The County has also received suggestions for incorporating additional technical expertise into the application review and selection process for affordable housing, public facility, and infrastructure projects and will explore these suggestions.

**H. Citizen Participation.** Snohomish County has adopted and is in compliance with a Citizen Participation Plan (CPP) developed under the terms of 24 CFR 91.105 of the Consolidated Plan regulations. The full text of the County's CPP follows.

**Introduction.** Snohomish County, in consortium with 19 cities and towns within the county, receives funds annually from the U.S. Department of Housing and Urban Development (HUD) on an entitlement basis under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Shelter Grant (ESG) programs. The

funds may be use to support affordable housing projects and non-housing community development projects (such as public facility improvements, infrastructure improvements, public services, and economic development) in our community. The funds must be used primarily to benefit low- and moderate-income persons, including but not limited to, persons with special needs such as abused children, battered spouses, elderly persons, homeless persons, illiterate adults, persons living with HIV/AIDs, migrant farm works, and severely disabled adults.

Snohomish County is the official grant recipient (lead agency) which contracts with HUD for these funds on behalf of the Consortium. In this capacity, Snohomish County is responsible for the overall administration, planning, monitoring, and reporting requirements for these programs on behalf of the Consortium.

The County acts through a five-member elected County Council to establish policies governing use of HUD funds and to select and contract with subgrantees to carry out housing and community development activities. Subgrantees include local governments (may include county departments), public agencies, and private non-profit organizations (including faith-based organizations). A nine-member Housing and Community Development Policy Advisor Board (PAB) representing the County and units of local government participating in the consortium assists the Council in its responsibilities. The PAB provides a public forum for developing, evaluating and recommending policy issues and recommending activities for funding for Council action. The PAB receives advice on program technical issues and recommendations for activities to be funded from its subordinate Technical Advisory Committee (TAC). The TAC consists of representatives of the local governments within the Consortium and the Housing Authority of Snohomish County as well as citizen representatives. The Snohomish County Human Services Department (HSD) and the Office of Housing, Homelessness and Community Development (OHHCD) within the HSD staffs the TAC and PAB and manages the competitive application processes for the County's HUD funds. It is also responsible for contracting, monitoring and compliance procedures.

Jurisdictions that receive CDBG, HOME, and ESG funds are required to prepare a Housing and Community Development Consolidated Plan (Consolidated Plan). The plan identifies the community's affordable housing and non-housing community development (public facility, infrastructure, public service, and economic development) needs and determines priorities, strategies and objectives to guide investment of these funds over a five-year period to help meet the identified needs. In addition, for each year of the five-year Consolidated Plan, an Annual Action Plan is developed. The Annual Action Plan is required to include the Consortium's spending plan for the next program year and to establish that the allocations are responsive to the strategies and objectives set forth in the five-year Consolidated Plan. It



includes a description of the specific activities to be funded and the amount and type of funding awarded to each activity. For the purposes of this citizen participation plan the term “Consolidated Plan” will refer to both the five year strategic plan and the annual plans.

Snohomish County believes that the participation of the general public in the development of the Consolidated Plan, substantial amendments to the plan, and the plan’s evaluation, is an essential aspect of the program. Only through input from the public, especially those populations that the Consolidated Plan is designed to principally benefit, can the County ensure that the allocation of limited federal community assistance funds will be governed by prevailing community priorities. This Citizen Participation Plan (CPP) is designed to encourage the maximum degree of meaningful public partnership in Snohomish County’s administration of the programs subject to the Consolidated Plan.

For additional information on the CPP, or any aspect of the Consolidated Plan or the CDBG, HOME, and ESG programs, please contact the Snohomish County Human Services Department (HSD) Office of Housing, Homelessness and Community Development (OHHCD), 3000 Rockefeller Avenue, M/S 305, Everett, WA 98201. Telephone numbers are: (425) 388-3267 (voice), (425) 388-3700 (TDD).

**Purpose.** The purpose of this Citizen Participation Plan is to provide for and encourage citizens to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan and the performance and evaluation report. The CPP is designed especially to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where Community Development Block Grant funds are proposed to be used and by residents of predominantly low- and moderate-income neighborhoods, as defined by Snohomish County. The CPP encourages the participation of all of the County’s citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The CPP seeks, in conjunction with consultation with public housing authorities, the participation of residents of public and assisted housing developments, in the process of developing and implementing the Consolidated Plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The County shall make an effort to provide information to the housing agencies about Consolidated Plan activities related to their developments and surrounding communities so that the housing agencies can make this information available at an annual public hearing to the extent feasible.

The CPP provides citizens with a reasonable opportunity to comment on the citizen participation plan and on substantial amendments to it. The CPP will be made generally available to the public and will be made available in a format accessible to persons with disabilities, upon request.

**Elements.** Citizen comment on the citizen participation plan and amendments. Proposed amendments to the CPP will be subject to a public comment period prior to being acted upon by the Housing and Community Development Policy Advisory Board (PAB). Proposed amendments will be advertised in a newspaper of general circulation within Snohomish County for a period of thirty days and notice of the proposed amendment will be sent electronically to: the mailing list of interested agencies and persons maintained by OHHCD, Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County. Copies of the proposed amendments, together with a copy of the full text of the existing CPP, will be available to the public on the County's Human Services Department OHHCD website and in hard copy upon request. The material will be made available in a format accessible to persons with disabilities upon request. Staff will evaluate commentary received and a written record maintained regarding disposition of written commentary and testimony. The PAB will act upon the amendments. Such action may be adoption, rejection, or a remanding to staff for additional work. If remanded for additional work, the revised amendments will be subject to the public comment process outlined above.

**Development of the Consolidated Plan.** Snohomish County wishes to ensure the participation of all interested and affected parties in development of both the five-year Consolidated Plan and the annual action plans which implement it. Before Snohomish County adopts a consolidated or annual plan, the County will make available to citizens, public agencies, units of local government and other interested parties information that includes the amount of assistance the County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. This will be accomplished by advertising the information in one or more newspapers of general circulation; by sending electronic notice to: the mailing list of interested agencies and persons maintained by OHHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County; by posting a notice on the County's Human Services Department OHHCD website; by maintaining the information for public inspection at the Snohomish County Human Services Department; and by e-mailing or mailing the information to agencies and individuals upon request. The information will be made available in a format accessible to persons with disabilities, upon request.

In addition, citizens are encouraged to participate in the development of the Consolidated Plan Annual Action Plans each year through participation in the Technical Advisory Committee (TAC). The TAC has eight seats for citizen representatives which are selected by the PAB through an application process. There are two seats representing each of the following groups: low-income persons, persons with disabilities, senior citizens, and minority persons. At least one of the citizen representatives is a homeless or formerly homeless person, or represents such groups.

Some programs governed by the Consolidated Plan have the potential to displace residents of Snohomish County. The County maintains a policy to minimize the displacement of persons and to assist any persons displaced. The policy specifies the types and levels of assistance the County will make available (or require others to make available) to persons displaced. It is part of the County's public participation process to make copies of that policy available upon request. The policy is also available for public inspection at the Snohomish County Human Services Department. The displacement policy will be made available in a format accessible to persons with disabilities, upon request.

**Publication of the Proposed Consolidated Plan.** Snohomish County will publish the proposed Consolidated Plan in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and to submit comments. This will be accomplished by publishing a summary of the proposed Consolidated Plan in one or more newspapers of general circulation; by sending the summary electronically to: the mailing list of interested agencies and persons maintained by OHHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County; by making copies of the proposed Consolidated Plan available at libraries, government offices, public places and on the Snohomish County Human Services Department OHHCD website. The summary will describe the contents and purpose of the Consolidated Plan and will include a list of the locations where copies of the entire proposed Consolidated Plan may be examined. In addition, the County will provide a reasonable number of free copies of the plan to citizens and groups that request it. The plan will be made available in a format accessible to persons with disabilities, upon request.

**Public Comment on the Proposed Consolidated Plan.** Snohomish County will accept comments from citizens on the proposed Consolidated Plan for a period of not less than 30 days beginning with the date of official publication of the plan summary. The County will consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final Consolidated Plan. A summary of these comments or views and a

summary of any comments or views not accepted and the reasons therefore, will be attached to the final Consolidated Plan.

**Amendments to the Consolidated Plan.** From time to time it is necessary to amend the Consolidated Plan. Amendments are characterized as either substantial or non-substantial and the County's policies for public participation differ for the two amendment categories.

Substantial amendments are defined as follows:

A substantial amendment to a Consolidated Plan is a change involving any of the following actions:

- (1) Allocation of funds, from any one or combination of the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG) and Supportive Housing Program (SHP) programs, in the amount of \$25,000 or more to a new activity (that is, an activity not previously allocated any funds under any of these grant programs).
- (2) Allocation of additional funds to a previously funded activity, from any one or combination of CDBG, HOME, ESG and SHP, of more than \$75,000 or an amount which raises the total commitment of all such funds to the activity by more than 50 percent of the originally planned total County contribution, whichever is greater; whether or not accompanied by a substantial change in other characteristics identified in (3) below.
- (3) A substantial change, whether or not accompanied by a change in funding allocation, in the purpose, location, scope, scale, or the number or identity of intended beneficiaries of a previously funded activity.
- (4) Cancellation of a previously funded activity, including any remaining part of a partially completed activity whereby the original characteristics of the activity [those listed in (3) above] are substantially changed as a result of the cancellation.
- (5) A substantial change in program objectives, funding priorities, methods of choosing activities for funding, or methods for obtaining public consultation and comment.

It is not practical to uniformly define, for all potential cases, the term "substantial change" as used in (2), through (5) above. The Housing and Community Development Policy Advisory Board (PAB), in its judgment, will interpret the term on a case-by-case basis. However, any action that changes the number or identity of the probable beneficiaries of an activity by more than 25 percent of their originally represented number will usually be considered a substantial change.

Within the dollar limits set in (2) above and unless accompanied by a “substantial change” in other characteristics, “cost overruns” encountered in completing funded activities and approved by the Policy Advisory Board will normally not be deemed “substantial amendments.”

Changes in the County’s budgeted costs of program planning and administration, which are limited by Federal statute and regulation to certain defined percentages of the HUD grants, are not treated as substantial amendments.

Snohomish County will provide citizens with reasonable notice of and an opportunity to comment on substantial amendments. Notice of intent to enact a substantial amendment to the Consolidated Plan will be published in summary form in one or more newspapers of general circulation; by sending an electronic copy of the notice to: the mailing list of interested agencies and persons maintained by OHHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County; and by making copies of the proposed amendment available at libraries, government offices and public places and on the Snohomish County Human Services Department OHHCD website. The notice will describe the contents and purpose of the amendment. The notice will be made available in a format accessible to persons with disabilities, upon request.

The County will receive comments on the substantial amendment for at least 30 days, commencing with official publication of the notice of intent, before the amendment is implemented. The County will consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the Consolidated Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore, will be attached to the substantial amendment of the Consolidated Plan.

Non-substantial amendments are considered by their nature to be routine programmatic actions and do not require public notice. They will become part of the administrative record and will be available for public inspection on request at the Snohomish County Human Services Department.

**Performance and Evaluation Reports.** Snohomish County is required to prepare an annual performance report for HUD and encourages citizens to review and comment on the report before it is transmitted to HUD. This report is known as the Consolidated Annual Performance and Evaluation Report (CAPER). Annually the County will publish a notice of intent to submit its performance report in one or more newspapers of general circulation; will send notice electronically to: the mailing list of interested agencies and

persons maintained by OHHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County; and will make copies of the report available at libraries, government offices and public places and on the Snohomish County Human Services Department OHHCD website. The County will receive comments on the performance report for a period of not less than 15 days prior the date the performance report is submitted to HUD. The County will consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

**Public Hearings.** The County will provide for at least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings will address housing and community development needs, development of proposed activities and review of program performance. To obtain the views of citizens on housing and community development needs, including priority non-housing community development needs, at least one of these hearings will be held before the proposed consolidated plan is published for comment.

Public notice of intent to hold the hearings will be accomplished by publishing a notice in one or more newspapers of general circulation a minimum of two weeks prior to the hearings; by sending an electronic copy of the notice to: the mailing list of interested agencies and persons maintained by OHHCD, the Everett/Snohomish County Homeless Policy Task Force mailing list maintained by OHHCD, and the Housing Consortium of Everett and Snohomish County; and by posting the notice on the Snohomish County Human Services Department OHHCD website. The notice will contain sufficient information about the subject of the hearing to permit informed comment. The hearings will be held at times and locations convenient to potential and actual beneficiaries. Normally, the hearings will be held in the Snohomish County Administration Building located at 3000 Rockefeller Ave, Everett, Washington. The Administration building is handicapped accessible, located adjacent to public transportation, has adequate parking and is central to a substantial proportion of the County's HUD-eligible population. When appropriate, meetings may be held in other locations to ensure access by potential and actual beneficiaries. The County will make reasonable accommodations for persons with disabilities, upon advance request. The County will also provide interpreters for hearings where a substantial number on non-English speaking residents can reasonably be expected to participate.

**Meetings.** It is the County's policy to provide citizens with reasonable and timely access to local meetings.



**Availability to the Public.** The Consolidated Plan as adopted, substantial amendments as adopted, the performance report and all associated policy documents will be available to the public, including in a form accessible to persons with disabilities, upon request. The most recent Consolidated Plan and performance report will be available on the Snohomish County Human Services Department OHHCD website. These documents will also be available by contacting the Human Services Department OHHCD. Substantial amendments and prior year Consolidated Plans will be available by contacting the Snohomish County Human Services Department OHHCD. Snohomish County OHHCD may be contacted by writing the Snohomish County Human Services Department at 3000 Rockefeller Avenue, M/S 305, Everett, WA 98201 or by contacting the department point of contact at (425) 388-3267 (voice), (425) 388-3700 (TDD).

**Access to Records.** The County will provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the County's use of assistance under the programs covered by the Consolidated Plan during the preceding five years.

**Technical Assistance.** The County will provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan. The assistance to be provided will be commensurate with the resources available to the County for provision of such assistance. The County will also provide applicant information workshops as part of the funding rounds for CDBG, HOME, and ESG funds to assist potential applicants in developing their project proposals.

**Complaints.** Within 15 working days, where practicable, the County will provide a timely, substantive written response to every written citizen complaint generated by the Consolidated Plan, amendments, or performance reports or any of the programs it governs.

**Use of Citizen Participation Plan.** Snohomish County commits itself to follow this citizen participation plan.

**Jurisdiction Responsibility.** The requirements for citizen participation do not restrict the responsibility or authority of Snohomish County for the development and execution of its Consolidated Plan.

The 2010-2014 Consolidated Plan and accompanying program year 2010 Annual Action Plan were developed in compliance with this process. The County held four public hearings in various parts of the County on housing and non-housing community development needs in November 2009. The hearings were held at handicapped-accessible locations. The County consulted widely with agencies and individuals impacted by these HUD-

supported programs in the County. The draft plan was advertised, circulated, and made available for 30 days of public review and comment from April 9, 2010 to May 10, 2010. Copies were made available at the Snohomish County OHHCD office, at Snohomish County libraries, at local city halls, and on the Snohomish County Human Service Department OHHCD website. Two additional public hearings on the draft plans were held on May 5, 2010. The County Council adopted the plan by motion at a public meeting on May 12, 2010. The milestones in the process are recited below:

- March 29, 2009: NOFA for housing projects for 2010 released
- March 30 –
- April 29, 2009: Technical assistance available for applicants
- April 9, 2009: Application workshop held
- April 29, 2009: Application deadline
- June 17, 2009: Technical Advisory Committee (TAC) meeting
- July 10, 2009: Policy Advisory Board (PAB) meeting
- October 4, 2009: NOFA for public facility and infrastructure projects for 2010 and for public service projects for 2010/2011 released
- October 5 –
- November 9, 2009: Technical assistance available for applicants
- October 7-8, 2009: Application workshops held
- November 2, 2009: Public hearing on housing and community development needs, meeting location in Everett
- November 9, 2009: Application deadline
- November 3, 2009: Public hearing on housing and community development needs, meeting location in Arlington
- November 4, 2009: Public hearing on housing and community development needs, meeting location in Lynnwood
- November 9, 2009: Public hearing on housing and community development needs, meeting location in Monroe
- January 25-27, 2010: Technical Advisory Committee (TAC) meetings
- February 23, 2010: Policy Advisory Board (PAB) meeting
- April 9, 2010: Draft 2010-2014 Consolidated Plan Draft 2010 Annual Action Plan published
- April 9 –
- May 10, 2010: 30-day public review and comment period
- May 5, 2010: Two public hearings on Draft 2010-2014 Consolidated Plan and Draft 2010 Annual Action Plan

<u>May 12, 2010:</u>	Council approves 2010-2014 Consolidated Plan and 2010 Annual Action Plan
<u>By May 15, 2010</u>	2010-2014 Consolidated Plan and 2010 Annual Action Plan submitted to HUD
<u>May 15- June 30, 2010:</u>	HUD reviews 2010-2014 Consolidated Plan and 2010 Annual Action Plan
<u>July 1, 2010:</u>	Program year 2010 begins

Recognizing the value of coordinating the Consolidated Plans of Snohomish County and the City of Everett and the Agency Plans of the Housing Authority of Snohomish County and the Everett Housing Authority, all four agencies co-sponsored the four initial public hearings in November of 2009.

A summary of comments received at the public hearings and during the 30-day public review and comment period and the County's response may be referenced in Section II. U.

Snohomish County's citizen participation plan also provides for a public program evaluation process. Within 90 days of the conclusion of each program year, the County prepares a report on the program year's issues and accomplishments. This report is made available to the public and is advertised publicly in the County's newspaper of record for comment. In addition, a public hearing is held at which the report is presented and public comment invited. Copies of the Consortium's 2005-2009 Consolidated Plan, 2009 Annual Action Plan, and 2008 CAPER were also made available for reference at the public hearings.

- I. **Interagency Consultations.** In developing the 2010-2014 Consolidated Plan and the 2010 Annual Action Plan, Snohomish County staff consulted with other public and private agencies that provide assisted housing, health services, and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons).

Strategies for consultation included face-to-face meetings, telephone conversations and written communications. In addition, agencies and local governments were invited to attend four public hearings at which comments on development of the 2010-2014 Consolidated Plan and the program year 2010 Annual Action Plan were sought. Notice of the public hearings was sent to the mailing list of interested agencies and persons maintained by Snohomish County OHHCD. The list includes agencies that develop affordable housing; agencies that provide assisted housing, social services, health services, and fair housing counseling; local chambers of commerce;

TAC representatives; and other interested agencies and persons. The list included agencies that focus on services to children, elderly persons, persons with various types of disabilities, persons with HIV/AIDS and their families, and homeless persons). Notice of the public hearings was also sent to the Everett/Snohomish County Homeless Policy Task Force (HPTF) mailing list maintained by OHHCD and the Housing Consortium of Everett and Snohomish County (HCESC) and local governments. Consultation/input meetings were held for members of the HCESC related to affordable housing needs and development and for members of the HPTF related to the shelter/housing and service needs and strategies for serving homeless persons and persons at risk of homelessness, including chronically homeless persons. Additional face-to-face meetings, telephone conversations and written communications augmented these efforts.

In addition, Snohomish County has considered the results of several public processes portions of which relate to housing, social services or community development issues. One of these has been the County's 10-year update to its General Policy Plan as mandated by the State Growth Management Act (GMA) and adopted in December 2005 which involved an extensive public participation process. The product of that process, the General Policy Plan (GPP), addresses and proposes policies for such issues as the distribution of population growth, housing, transportation, capital facilities and economic development. While these issues were not addressed by the County's growth management planners within the limited context of HUD formula funds eligibility criteria, the public comments elicited by the process and the policies proposed in the GPP have direct bearing on the County's HUD-eligible populations. The public participation process pursued during update of the GPP included broad dissemination of all plan proposals and alternatives, opportunity for written comments, stakeholder interviews, provision for open discussion at public workshops, meetings and hearings after effective notice, communication programs, information services and consideration of and response to public comments. Because the comprehensive planning process is a continuing one under GMA, this source of public participation continues to benefit the Consolidated Plan.

Substantial public participation indirectly impacted the Consolidated Plan via various divisions in the Snohomish County Human Services Department (HSD), in addition to OHHCD, which are active in many areas related to housing and non-housing service delivery. The HSD administers and coordinates a wide-variety of programs for county residents that "provide services to individuals who, as a result of their health, or economic or social condition, require financial assistance, institutional care, rehabilitation, training, education or other human services." The programs serve various populations including elderly persons; persons with developmental disabilities, mental illness, and drug or alcohol abuse; youth, families, veterans, and low-income persons. In serving these clients, a large

proportion of whom are HUD-eligible, the department relies on professional staff organized into issue focused divisions (e.g. aging, mental health, drug abuse and developmental disabilities). Departmental policy development benefits from formal and informal public comment relayed through the staffs of the various divisions; through boards, task forces, committees and groups staffed and attended by department staff, and in the development of various plans, such as the 2008-2011 Area Plan on Aging, the 2009 Developmental Disabilities Community Plan, the 2006 Snohomish County Low-Income Needs Assessment, and the 2007-2017 Affordable Housing Production Plan. Because of intradepartmental consultations within the HSD and review of various plans, the Consolidated Plan benefited from the results of the HSD public participation activities.

Indirect public participation also comes to the County through participation of residents in the Housing Authority of Snohomish County's (HASCO) processes. HASCO has a resident commissioner on its six-member Board of Commissioners and residents are involved on the resident advisory board which assisted in development of the PHA plan. Resident input is provided through these processes are reflected in HASCO's PHA plan and the programs for which it seeks HUD-funded assistance from the County.

Snohomish County's continuum of care planning process for the homeless makes its own contribution to the interagency consultation and public participation aspects of developing the Consolidated Plan and each year's Action Plan. The Snohomish County Homeless Policy Task Force (HPTF) is a county-wide, community-based planning group consisting of representatives from State and local government agencies, public housing authorities, school/university systems, law enforcement/corrections, local WIA Boards, non-profit organizations, faith-based organizations, funders, advocacy groups, business associations, medical representatives, tribes, and persons experiencing homelessness. Working together and meeting regularly, the partners have been able to improve coordination of and advocacy for housing and services as well as reduce duplication of effort. The task force is the designated entity for developing and coordinating the County's continuum of care plan and, as part of that process, oversees the development of each year's application for McKinney-Vento homeless funds. Snohomish County held a consultation/input meeting for HPTF members to provide direct input into the development of the homeless needs and strategy of the Consolidated Plan and HPTF members were also invited to attend the public hearings. Additionally, the HPTF developed the County's 10-Year Plan to End Homelessness, Everyone at Home Now, and that plan was taken into consideration in developing the Consolidated Plan. Also, the work of the task force feeds directly into the consolidated planning process through staff of the County's Human Services Department OHHCD who participate regularly in HPTF meetings, are responsible for preparing the continuum of care plans, oversee homeless data collection efforts for the community, and were actively

involved in the development of the homeless needs and strategy section of the Consolidated Plan.

Another critical partner in the consolidated planning process has been the Housing Consortium of Everett and Snohomish County (HCEC). The HCEC has over 40 members including affordable housing providers, service providers, banks, realtors and builder associations, local government, organizations that provide funding for affordable housing development and other interested persons. Its mission is to provide strategic leadership in crafting affordable housing policy and programs in Snohomish County. The HCEC meets monthly. Several members of the County's HSD OHHCD participate in the HCEC, providing a conduit into the consolidated planning process. In addition, Snohomish County held a consultation/input session at one of their regularly scheduled meetings to provide direct input into the development of the affordable housing need and strategy of the Consolidated Plan. In addition, Snohomish County provided funds to the HCEC in their development of an affordable housing action plan which would build upon existing local planning efforts and collaboration efforts around affordable housing and homelessness. HCEC's Action Plan, entitled Housing Within Reach, was completed in June 2008 and was taken into consideration during the development of the Consolidated Plan.

Indirect consultation also came through the County's Human Services Department's development of a draft ten-year Affordable Housing Production Plan for 2007-2017. Input was provided from the community through a workgroup that consisted of stakeholders, non-profit developers, public and private funders, and service providers, dedicated to ensuring low- and moderate-income residents of Snohomish County have safe, affordable, permanent housing. The plan identifies priorities and goals for the production and preservation of affordable housing over the next ten years for the Office of Housing, Homelessness, and Community Development and was taken into consideration in development of the Consolidated Plan.

The Community Housing Resource Board of Everett and Snohomish County (CHRB) was also consulted during the consolidated planning process. The purpose of the CHRB is to expand public awareness of federal and state fair housing laws which prohibit discrimination. The CHRB holds 4-5 free educational seminars each year in various locations in the county on fair housing and landlord-tenant laws. The Volunteers of America Western Washington (VOA) was also consulted. VOA provides rental housing mediation/fair housing counseling project which provides information on landlord/tenant and fair housing laws, alternative dispute resolution services, and fair housing counseling for individuals who believe they are experiencing discrimination in housing.



In preparing the portion of the Consolidated Plan concerning lead-based paint hazards, the Snohomish Health District and the Washington State Department of Health were consulted.

Snohomish County also provided an opportunity for direct input into the planning process for local jurisdictions that are members of the Consortium as well as for TAC and PAB members via a consultation/input meeting that was held during the planning process. A copy of the draft 2010-2014 Consolidated Plan and the 2010 Annual Action Plan was also be provided to each Consortium member city/town for their review during the 30-day public review and comment period.

The Housing Authority of Snohomish County and the Everett Housing Authority were also consulted in development of this plan.

A full list of all agencies that provided both direct and indirect input into the consolidated planning process is available upon request.

- J. **Program Funds.** The three sources of federal housing and community development funds received annually by the County on behalf of the Consortium are Community Development Block Grant (CDBG), HOME Investment Partnership (HOME) and Emergency Shelter Grant (ESG). These funds become available July 1 of each year. An explanation of the project selection process for these funds and of these programs is found below. Information on funding that flows into the County from the Housing Opportunities for Persons with AIDS (HOPWA) program for the King, Snohomish, and Island County region may also be found below.

*Project Selection Process.* The County will follow a similar project selection process for affordable housing projects, public facility and infrastructure projects, and public service projects, although the application timeline for these projects varies. The County will notify the community of available CDBG, HOME, and ESG funds through a Notice of Funding Availability (NOFA). This notice will be published in a newspaper of general circulation in the county; will be sent electronically to Consortium members, to the mailing list of interested agencies and individuals maintained by OHHCD, to the mailing list for the Everett/Snohomish County Homeless Policy Task Force maintained by OHHCD, and to the Housing Consortium of Everett and Snohomish County; and will be posted on the County's Human Services Department OHHCD website. The County will also send a hard copy of the NOFA to the mailing list of interested agencies and individuals maintained by the county. County staff will provide technical assistance at workshops for interested applicants and will also provide additional technical assistance upon request to interested applicants to the extent feasible. Applications submitted will be reviewed and evaluated by County staff and eligible projects will be presented to the Technical Advisory Committee (TAC) for

consideration. The TAC reviews and ranks project proposals on such issues as community need, conformance with adopted plans and priorities, the nature and extent of benefit, financial or technical feasibility, and/or other factors bearing upon the merit of proposals competing for funding. The TAC makes funding recommendations on project selection to the Housing and Community Development Policy Advisory Board (PAB) for final consideration. The PAB makes final funding recommendations to the Snohomish County Council. These recommendations are published for a thirty-day public review and comment period prior to Snohomish County Council action. Snohomish County Council action on these funding recommendations typically occurs in the spring and the package of proposed allocations is submitted to HUD by mid-May as part of the Annual Action Plan for that fiscal year. HUD has 45 days to approve or request modifications of the package and the program year commences July 1. (Refer to Section I. G. for a fuller discussion of the roles and constitution of the TAC and PAB).

The affordable housing application process for CDBG housing and HOME funds typically begins two springs prior to the fiscal year July 1 commencement date with a Notice of Funding Availability. However, CDBG housing funding for rehabilitation programs is on a two-year application cycle and will be part of the housing NOFA process every other year. TAC and PAB review and recommendations will typically occur by the end of that summer. The Snohomish County Council may act on the recommendations thereafter, subsequent to a 30-day public review and comment period, with estimated awards contingent upon actual funds received under these grant programs. The package of proposed allocations for housing projects, including any adjustments to PAB recommendations or prior Council action if taken regarding estimated awards, is typically acted on by the Council along with the proposed allocations for the other federal funds in the following spring which precedes the fiscal year July 1 commencement date. The second year allocation of CDBG Housing funds will be acted on by the PAB and the Council in the second year of the application cycle.

The annual application process for CDBG public facility and infrastructure funds typically begins in the fall prior to the fiscal year July 1 commencement date with a Notice of Funding Availability (NOFA). For years in which CDBG public service and ESG application process occurs, these NOFAs are normally combined. Staff review and evaluation typically occurs in late fall/early winter with TAC and PAB review and recommendations usually occurring in the winter. Council action, as indicated above, normally occurs in the spring.

The application process for CDBG public service and ESG funds is a bi-annual process. It typically begins in the fall prior to the fiscal year July 1 commencement date of the first year of the application cycle with a Notice of Funding Availability (NOFA). For years in which the CDBG public service and

ESG application process occurs, the NOFA is normally combined with the NOFA for CDBG public facility and infrastructure projects. Staff review and evaluation typically occurs in late fall/winter. TAC review usually occurs in the winter and the TAC makes recommendations for two years of funding. First-year recommendations are reviewed and evaluated by the PAB in the winter and acted on by the Council in the spring in the first-year of the two-year cycle. Second-year recommendations are reviewed and evaluated by the PAB the following winter and acted on by the Council in the following spring of the second-year of the two-year application cycle.

*Community Development Block Grant (CDBG).* CDBG funds may be used for affordable housing, community development (public facilities, infrastructure, public services, economic development) and administration. At least 51% of households served with these funds must be low- and moderate-income (at or below 80% of the area median income). Under CDBG regulations, Snohomish County qualifies for an exception to this rule for “area-wide benefit projects” which benefit all residents of a particular area such as improvements to streets and sidewalks and parks (as compared to “limited clientele” projects which benefit specific clientele such as elderly persons, persons experiencing homelessness, victims of domestic violence, etc.). This exception currently reduces the threshold to 46.4% for “area-wide benefit” projects for Snohomish County and may be adjusted annually by HUD. Under CDBG regulations, no more than 20% of the annual CDBG allocation (plus 20% of that year’s program income) may be used for administrative costs and no more than 15% of the annual CDBG allocation (plus 15% of the prior year’s program income) may be used for public service costs. The bulk (at least 65%) of the CDBG allocation is available for other investments for affordable housing and community development activities. Snohomish County allocates the federally mandated minimum 65% to these categories. Of the amount representing 65% of the total CDBG allocation, it is current County practice that 55% will be dedicated to non-housing community development capital projects consisting of public facility and infrastructure projects and 45% will be dedicated to housing capital projects.

*Emergency Shelter Grant.* ESG funds may be used for homeless assistance and homeless prevention activities. The ESG program is designed to be the first step in a continuum of assistance to prevent homelessness and to enable homeless individuals to move toward independent living. The objectives of the program are to help improve the quality of existing emergency shelters for the homeless, to help make available additional shelters, to help meet the costs of operating these facilities, to help provide essential social services to the homeless, and to help prevent homelessness. Under the ESG regulations, no more than 5% of the annual ESG allocation may be used for administrative costs. The bulk (at least 95%) of the total ESG allocation is available for project activities. Snohomish County allocates the federally mandated minimum, 95%, for project activities and 5% for administrative

costs. In May 2009, Congress enacted the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act). This act renames the Emergency Shelter Grant the Emergency Solutions Grant and makes several changes to the regulations. It is expected that HUD will begin implementing the HEARTH Act in November 2010 and it is anticipated this will require changes to the current ESG program.

*HOME Investment Partnership.* Activities eligible for HOME assistance are focused on four principal program areas: (1) homeownership; (2) homeowner property rehabilitation; (3) rental housing development and (4) tenant-based rental assistance. These program areas share equal priority in the 2010-2014 Consolidated Plan. HOME-assisted new construction and rehabilitation projects must meet local building codes and federal "Section 8" housing quality standards as set forth in federal regulations cited in 24 CFR 982.401. HOME income targeting regulations require that 90% of tenant-based rental assistance and rental units be dedicated to families at or below 60% of the median income with the remainder going to families at or below 80% of median income. Also, 100% of home ownership funds must benefit families at or below 80% of the median income.

Under HOME regulations, no more than 10% of the annual HOME allocation may be used for administrative costs. Snohomish County allocates 10% of the annual HOME allocation for this purpose. Under HOME regulations, no more than 5% of the annual HOME allocation may be used for operating costs for Community Housing Development Organizations. Snohomish County allocates up to 5% of the HOME allocation each year for this purpose.

HOME Program regulations permit the County and the City of Everett to pool their populations and other formula factors for maximum benefit under the terms of the federal allocation formula. The County and the City are signatories to a two-party interlocal agreement that reserves to the City a portion of HOME funds proportionate to the increase in funds beyond what the County would receive without Everett's participation. Consistent with that agreement, the County allocates 21% of the annual HOME allocation to the City of Everett for affordable housing projects benefitting its residents. The City of Everett selects specific projects through a separate allocation and citizen participation process and coordinates with the County in county-wide citizen participation process consistent with Consolidated Plan requirements for these funds. Projects selected through this process are either included in the package of proposed allocations acted on by the Council in the spring and submitted to HUD by mid-May or are adopted as amendments to this package.

With respect to the allocation of HOME funds by Snohomish County, the following stipulations comprise a portion of the applicable policies.

**Resale/Recapture Provisions** Resale and recapture provisions apply to the use of HOME funds for homebuyer assistance programs. Snohomish County will allow for the use of either resale or recapture provisions, as appropriate. Resale or recapture provisions are triggered when, during the period of affordability, the housing ceases to be the principal residence of the buyer who was assisted with HOME funds. Applicants for HOME funding will need to propose resale or recapture provisions at the time of application for funding and demonstrate how the provisions are consistent with the resale or recapture guidelines.

**Resale Guidelines** Resale provisions must be used in situations where HOME funding will be provided as development subsidies (as opposed to direct assistance to the low-income buyer) and where assistance is provided to homebuyers in the form of grants. Resale provisions may be used in other instances as well. When resale provisions are proposed, they must ensure that:

- the property will be sold to a low-income buyer who will use the property as a principal residence;
- the price at resale will provide the original HOME-assisted buyer with a fair return on their original and any subsequent investments in the property; and
- the housing will continue to be affordable throughout the period of affordability to a range of low-income buyers.

**Recapture Guidelines** Recapture provisions are intended to ensure that all, or a portion, of the HOME funds provided to the homebuyer, are returned to Snohomish County when the home is no longer the buyer's principal residence. The following options for recapture of funds are acceptable:

- recapture of the entire amount;
- reduction in the amount recaptured based on the amount of time during the period of affordability in which the buyer has occupied the home;
- share of net proceeds (sales price minus loan repayments, other than the HOME loan and closing costs);
- return of the owner's investment first and then repayment of all or a portion of the HOME assistance.

The special provisions of the HOME Program related to single-family properties with more than one unit (i.e. duplex, triplex, four-plex) [24 CFR Part 92.254(a) (5) (ii) (6)] and lease-purchase programs [24 CFR Part 92.254(a) (5) (ii) (7)] will also apply as appropriate.

**HOME Tenant-Based Rental Assistance (TBRA)** Snohomish County is not presently funding any TBRA programs with HOME funds.



**Other Forms of Investment** Snohomish County does not intend to use HOME funds for forms of investment other than those described in 24 CFR 92.205(b).

**HOME Affirmative Marketing** Snohomish County requires all agencies receiving HOME funds for their projects with five or more HOME-assisted units to have plans to affirmatively market housing to eligible populations. This requirement is included in contracts between Snohomish County and the agencies receiving the HOME funds. The affirmative marketing plan must include information on: 1.) how the sponsor will inform the public and potential residents about fair housing laws, 2) how the sponsor will affirmatively market the units and inform persons who might not normally apply for housing through special outreach, and 3.) how the sponsor will document affirmative marketing efforts and evaluate their success. The marketing plans are reviewed by OHHCD staff when the projects are monitored. Housing projects must display the Equal Housing Opportunity information and logo in an area that is accessible to eligible households.

**Minority/Women's Business Outreach** Snohomish County will continue its policy of ensuring that business enterprises owned by minorities and by women (M/WBEs) are given an equal opportunity to compete for projects funded in part with County HUD funds. Because the list of qualified M/WBE's changes on a daily basis, and because the county does not have the resources to maintain its own current list, OHHCD staff refer sub-grantees to the internet web-site maintained by the State of Washington. The County's policy on M/WBE opportunity is also include in the standard language of each contract executed for projects. Finally, M/WBE requirements will be discussed at pre-bid and pre-construction meetings with sub-grantees and their contractors.

**Refinancing** Snohomish County is not presently using HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds. Should the County do so, it will first promulgate financing guidelines as required under 24 CFR 92.206(b).

**American Dream Downpayment Initiative:** Within the HOME Program, HUD created a specific allocation of funds to assist low- and moderate-income persons achieve homeownership. Referred to as the American Dream Downpayment Initiative (ADDI), HUD intended that the funds be used to increase the rates of homeownership among low- and moderate-income persons. The ADDI program no longer receives funding from the federal government. However, ADDI funds allocated to the Consortium previously are still being expended and some of these funds were re-allocated as part of the 2010 funding round. Pursuant to an interlocal agreement, Everett received 21% of the Consortium's ADDI funds each program year as a proportionate share of funding. Agencies with current awards as well as agencies



recommended for this funding for 2010 include: HomeSight, Housing Hope, Parkview Services, and Home for Good. HomeSight operates a first-time homebuyer program for Snohomish County residents using HOME, ADDI and HOME and CDBG program income. Parkview Services operates a first-time homebuyer program for households where at least one member of the family has a physical or developmental disability. Housing Hope operates a first-time homebuyer program to assist participants in its sweat-equity home construction program. Home For Good is implementing a first-time homebuyer program to assist households who purchase homeowner units in a community land trust it is developing.

HUD requires the County to develop “a plan for targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies for the purposes of ensuring that ADDI funds are used to provide Downpayment assistance for such residents, tenants and families.” To that end, the County requires agencies receiving ADDI programs to develop a plan to meet this requirement prior to receiving ADDI funds.

HUD regulations also require that the County provide in this Plan a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership. Each of the agencies receiving ADDI funds provide homebuyer education and counseling services as part of their program.

***Housing Opportunities for Persons With Aids.*** HOPWA funds may be used to provide emergency, transitional and permanent housing as well as support services for low income persons with AIDS and their families. HUD allocates these funds on a formula basis to jurisdictions with a population of 500,000 or more and more than 1,500 cumulative cases of AIDS. The City of Seattle is the regional grantee for the HOPWA Program for the Seattle Eligible Metropolitan Area (EMA), which includes all of King, Snohomish and Island counties. The HOPWA program is administered by the City of Seattle Human Services Department. An AIDS Housing Committee representing jurisdictions and providers from throughout the EMA sets policies for allocation of HOPWA funds. An annual set-aside of funds is provided annually to assist persons living with AIDS in Snohomish County and these funds are administered locally by Catholic Community Services.

- K. Program Monitoring** Monitoring of activities assisted in whole or in part with HUD housing and community development funds administered by Snohomish County and the City of Everett pursuant to this Plan will be carried out by staff of the County Human Services Department and the City of Everett Department of Community Development, respectively, in accordance with the specific compliance monitoring requirements prescribed by regulation for each of the HUD programs. All program compliance requirements and

reports required of subrecipients and project sponsors will be specified in the County's and City's funding award contracts. Monitoring procedures and practices will assure that reports are submitted, reviewed and assessed, and that any noncompliance reflected in reports is investigated and resolved. County and City staff will also conduct a risk assessment of all agencies being funded to assist in determining which projects must be monitored at more frequent intervals. On-site monitoring will be done to examine subrecipients' and project sponsors' operations and records, as required by HUD regulations, to validate reports and verify compliance. This includes County monitoring of the City of Everett, which is considered a subrecipient under the HOME regulations. These monitoring operations will be conducted in accord with written operating procedures and schedules. The substantive results of funded activities will be monitored in relation to the Consolidated Plan objectives.

Activities incorporated in the Action Plan which are assisted with funds administered by another County or City department, by one of the housing authorities, or by another independent public agency, will be monitored for regulatory compliance in accordance with their funding source regulatory terms by the administering department or agency. County and City planning and community development staff will obtain annual reports of the substantive results of these activities from the administering agencies to monitor for progress against the Plan objectives.

HOME eligible projects are reviewed and inspected (if applicable) for consistency with the Consolidated Plan, program targeting/income verification of clients, HOME investment per unit, property standards and administrative requirements. An exhaustive list of these items is reviewed and verified within each application. Ongoing monitoring includes these items in a detailed check list format and report created by the analyst and staff as part of a schedule of monitoring activities this office conducts annually.

Projects are monitored for timeliness of expenditures as part of the program compliance monitoring referenced above. In addition, on-site monitoring of housing projects includes reviewing activities for compliance with housing codes using a simplified version of the Uniform Physical Conditions Standards form.

To the extent feasible, the County will coordinate monitoring of jointly-funded projects with the Washington State Department of Commerce (formerly CTED) and the Washington State Housing Finance Commission (WSHFC).

- L. **Amendments.** As needed, this Consolidated Plan will be amended in compliance with Snohomish County's citizen participation plan and HUD program regulations.

**M. County Contact Information.** For additional information or questions regarding the Consolidated Plan, Annual Action Plans, amendments to these plans, and/or Consolidated Annual Performance and Evaluation Reports (CAPERs), County contact information is provided below.

Contact: Sue Tracy, Senior Grants Analyst

Address: Snohomish County HSD/OHHCD  
3000 Rockefeller Avenue, M/S 305, Everett, WA 98201

E-mail: sue.tracy@co.snohomish.wa.us

Phone: (425) 388-3269. TDD: (425) 388-3700.

Reasonable accommodations will be made to provide the information in this document in an alternate format upon request.