

I. CONSOLIDATED PLAN: Program Background and Structure

1. Introduction. Snohomish County, in consortium with 18 cities and towns, receives funds from the federal Department of Housing and Urban Development (HUD) on an entitlement basis. (Because these funds are allocated by HUD based on a formula, they are sometimes referred to as “formula funds” and are so designated at several points in this Consolidated Plan). The funds are for the purposes of assisting with emergency shelter; transitional and permanent housing; public services for the elderly, the handicapped, and other special needs populations; capital investment in infrastructure; and economic development. Federal regulations require that persons of low- and moderate-income, the elderly or persons with special needs comprise the majority of all persons receiving benefit from expenditure of these funds.

The three sources of the County’s HUD funds are the Community Development Block Grant program (CDBG), the HOME Investment Partnership program (HOME), the Emergency Shelter Grant program (ESG), Housing Opportunities for Persons With AIDS (HOPWA). A full explanation of each of these programs will be found below in Section 7, Program Funds.

Jurisdictions that receive HUD funds are required to prepare a Consolidated Housing and Community Development Plan. Using a five-year horizon, the plan describes the community's housing, public service and community development needs and demonstrates how anticipated funding from HUD will be used to address those needs. In addition, the plan must include the recipient's spending plan for the next program year and establish that the allocations are responsive to the strategies and objectives cited in the five-year plan. This document has been prepared to meet those requirements and will be in effect from July 1, 2005 through June 30, 2010 (Snohomish County operates its federal entitlement grant programs on a July 1- June 30 fiscal year). The year 2005 Action Plan included with this Consolidated Plan covers the program year commencing July 1, 2005 and ending on June 30, 2006. Annual Action plans for the years 2006-07, 2007-08, 2008-09 and 2009-10 will be produced in accord with the County’s public participation plan and enacted as annual amendments to this Consolidated Plan.

This plan is subdivided into three units. This, the first, lays out the purposes of the plan, and discusses the process employed in producing the Consolidated Plan and annual Action Plan. The second, the 2005-2009 Strategic Plan, presents data on and analysis of the County’s public service and housing and non-housing community development needs and strategies for addressing identified community needs. The third, the year 2005 Annual Action plan, lists the projects proposed for funding with federal funds during program year 2005 and which address issues identified in the Strategic Plan.

Because all aspects of the 2005-2009 Consolidated Plan as well as the program year 2005 Action Plan were developed together, the processes and procedures recounted in this section (e.g., public participation, interagency consultation, 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.

2. Purpose. The Consolidated Plan is a statement of principles and actions which will guide the County and the other members of the Snohomish County Housing and Community Development Urban County Consortium (the consortium) in addressing priority housing, public service and community development needs by providing decent housing and a suitable living environment for, and to expand economic opportunities available to, persons of low- and moderate-income.

"Providing decent housing" includes:

- Assisting homeless persons to obtain affordable housing;
- Retaining affordable housing stock;
- Increasing the availability of permanent housing that is affordable and available without discrimination; and
- Increasing supportive housing that includes structural features and services to enable persons with special needs to live in dignity.

"Providing a suitable living environment" includes:

- Improving the safety and livability of neighborhoods;
- Increasing access to quality facilities and services;
- Reducing the isolation of income groups within areas by deconcentrating housing opportunities and revitalizing deteriorating neighborhoods;
- Restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and
- Conserving energy resources.

"Expand economic opportunities" includes:

- Creating jobs for low income persons;
- Providing access to credit for community development that promotes long-term economic and social viability; and
- Assisting residents of federally assisted and public housing achieve self-sufficiency.

HUD requires that the benefits of programs supported with formula funds principally accrue to persons of low and moderate-income and/or defined special needs populations and/or the elderly and/or the homeless. This means that a minimum of 51% or more of those assisted by such programs must fall into one or more of these classes.

Using the most recent compilation available at the time this plan was drafted (January, 2005), Table 1 shows the income eligibility levels for families in Snohomish County. Families at or below the income levels listed in the table meet the income eligibility test for assistance from the federal programs administered by Snohomish County and subject to this Consolidated Plan.

Table 1

| <i>2004 Adjusted Family Income Limits</i> | |
|--|------------------|
| 1 person | \$40,600 or less |

| | |
|----------|------------------|
| 2 person | \$46,400 or less |
| 3 person | \$52,200 or less |
| 4 person | \$58,000 or less |
| 5 person | \$62,650 or less |
| 6 person | \$67,300 or less |
| 7 person | \$71,900 or less |
| 8 person | \$76,550 or less |

Elderly beneficiaries are defined as those 62 years of age or older; examples of special needs beneficiaries are developmentally delayed and handicapped persons, and persons suffering from HIV/AIDS and their families.

In addressing the service and infrastructure needs of targeted populations, the Consolidated Plan and the annual Action Plan guide the investment of substantial sums of public funds. Public participation is fundamental to the process that the County employs in developing the objectives and priorities that guide those investments. Driven by a written public participation plan, the process relies on multi-faceted community consultations that solicit input from the general public, local jurisdictions, non-profit agencies and populations targeted by HUD funds.

3. Lead Agency. Acting in consortium with 19 cities and towns, Snohomish County has been designated an entitlement jurisdiction by HUD, qualifying it to receive HUD funds on a formula basis. Snohomish County is the legal entity (lead agency) which contracts with HUD on behalf of the other members of the consortium and administers the program. The County acts through a five member elected County Council to establish policies governing use of HUD funds and to contract with subgrantees. Subgrantees comprise non-profit agencies and units of local government.

4. Institutional Structure. The consortium’s nine member Policy Advisory Board (PAB) assists the County Council in its responsibilities. The PAB’s makeup and representation are as follows: the Snohomish County Executive (or his designee); three members of the Snohomish County Council; one representative selected by all participating units of local government whose population base, independently, is 10,000 or greater; one representative selected by participating units of local government whose population base, independently, is between 3,000 and 10,000; one representative selected by all participating units of local government whose population base, independently, is less than 3,000; one representative selected at large by all participating units of local government; and another representative selected at-large by the eight members of the PAB. Each member of board has one unweighted vote; the member selected by the PAB serves as the chair of the board, voting 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.

Consistent with 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 relating to HUD entitlement funds.

The interlocal agreement also establishes a Technical Advisory Committee (TAC) to assist the PAB with project review. The TAC reviews project proposals on such issues as technical merit, financial feasibility and extent of benefit, and makes recommendations on project selection to the PAB. The TAC consists of one representative from each unit of local government in the consortium, one representative of the Housing Authority of Snohomish County; and citizens selected by the PAB through an application process representing the following HUD-defined benefited categories: two disabled persons; two low income persons, at least one of whom is homeless, formerly homeless or represents such groups; two senior citizens; and two minority persons. Each TAC member has one unweighted vote.

The Office of Housing and Community Development of the Snohomish County Department of Planning and Development Services staffs the PAB and TAC and manages the competitive application processes for the County's HUD funds. It is also responsible for contracting, monitoring and compliance procedures.

5. Citizen Participation. Snohomish County has adopted and is in compliance with a Citizen Participation Plan (CPP) developed under the terms of Section 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, receives funds from the federal Department of Housing and Urban Development (HUD) on an entitlement basis. The funds are for the purposes of assisting with emergency shelter; transitional and permanent housing; social services for the elderly, the handicapped, and other special needs populations; capital investment in infrastructure; and economic development. Federal regulations require that persons of low- and moderate-income, the elderly or persons with special needs comprise the majority of all persons who benefit from expenditure of these funds.

Snohomish County is the legal entity responsible to HUD for allocation of the County's entitlement HUD funds. The County acts through a five member elected County Council to establish policies governing use of HUD funds and to contract with subgrantees comprising non-profit agencies and units of local government. A nine member Policy Advisory 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 for Council action. The PAB receives advice on program technical issues from its subordinate Technical Advisory Committee (TAC). The Grants Administration section of the County's Department of Planning and Development Services staffs the 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 HUD funds are required to prepare a Consolidated Housing and Community Development Plan. Using a five-year horizon, the plan sets forth the community's housing, social service and community development needs and demonstrate how anticipated funding from HUD will be used to address those needs. In addition, a supporting action plan must be developed annually to establish that each year's allocations of HUD funds are responsive to the goals and objectives cited in the five year plan (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 it, 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 scarce 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 Snohomish County's HUD Housing and Community Development programs, please contact the Snohomish County Department of Planning and Development Services, 3000 Rockefeller MS#604, Everett, WA 98201. Telephone numbers are: (206) 388-3311 (voice), (206) 388-3700 (TDD) and 388-3670 (fax).

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 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 will 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.

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 Policy Advisory Board. Proposed amendments will be advertised in a newspaper of general circulation within Snohomish County for a period of thirty days. Copies of the proposed amendments, together with a copy of the full text of the existing CPP, will be available to the public on 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 Policy Advisory Board 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 maintaining the information for public inspection at the department of Planning and Development Services, and by 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.

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 that policy available upon request. The policy is also available for public inspection at the offices of the department of Planning and Development Services. 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, and by making copies of the proposed Consolidated Plan available at libraries, government offices, public places, and on the County's Internet web site. 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 Policy Advisory Board, 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, and by making copies of the proposed amendment available at libraries, government offices, and public places. 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 department of Planning and Development Services.

PERFORMANCE 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. Annually the County will publish a notice of intent to submit its performance report in one or more newspapers of general circulation, and by making copies of the report available at libraries, government offices, and public places. 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, and by mailing notices to agencies and individuals who request being placed on a notification list. The notice will contain sufficient information about the subject of the hearing to permit informed comment. Normally, the hearings will be held in the Snohomish County Administration Building located at 3000 Rockefeller, 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. In addition, by advanced request to its ADA compliance program, the County is prepared to offer assistance to physically-, visually- and hearing-impaired citizens to ensure

that the hearings are accessible to all. This includes providing translators for hearings where a substantial number of non-English speaking residents can be reasonably 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, 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 by writing the Snohomish County Department of Planning and Development Services, 3000 Rockefeller MS#604, Everett, WA 98201 or contacting the department at (206) 388-3311 (voice), (206) 388-3700 (TDD) or 388-3670 (fax).

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.

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 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.

This Consolidated Plan and accompanying program year 2005 annual Action Plan were developed in compliance with that process. The County held four public hearings in various parts of the County on housing and non-housing community development needs (access to all hearings was in compliance with the Americans With Disabilities Act); the County consulted widely with agencies, groups and individuals impacted by HUD-supported programs in the County; and the plan was advertised and circulated for 30 days of public comment. The milestones in that process are recited below.

September 29, 2004: NOFA for program year 2005 released

November 1, 2004: Public hearing on public service, housing and non-housing community development needs

November 4, 2004: Public hearing on public service, housing and non-housing community development needs

November 8, 2004: Public hearing on public service, housing and non-housing community development needs

November 9, 2004: Public hearing on public service, housing and non-housing community development needs

October 6-7, 2004: Technical assistance for applicants

October 29, 2004: Applications due

November 2, 2004 – January 1, 2005: Technical review of applications

January 5, 2005: Supplemental application period opened

January 19, 2005: Supplemental application period closed

February 8, 2005: Technical Advisory Committee (TAC) meetings

February 28, 2005: Policy Advisory Board acts on TAC recommendations

March 2, 2005: Present Consolidated Plan as part of Housing Authority of Snohomish County's public hearing on authority's Agency Plan

March 20, 2005: Publish Consolidated Plan and program year 2005 Action Plan

March 20-April 19 2005: 30-day public comment period

May 11 2005: Council approves Consolidated Plan and program year 2005 Action Plan

May 13, 2005: Consolidated Plan and program year 2005 Action Plan sent to HUD

May 13-June 30, 2005: HUD reviews Consolidated Plan and program year 2005 Action Plan

July 1, 2005: Program year 2005 begins

In the schedule above, the items referring to a "supplementary application period" reflect the fact that the consortium did not receive applications for facilities and housing projects adequate in the aggregate to commit all of the anticipated funding for program year 2005. Consequently, the consortium sponsored a supplemental application period, notification of which to eligible applicants was made via a newspaper ad and direct mailings to the agencies.

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 cosponsored the four initial public hearings in November of 2004. Staff from all four agencies attended the meetings and participated in discussions with the public.

The program year 2005 Action Plan was considered and adopted by the Policy Advisory Board at a public meeting on February 28, 2005 and was advertised for public comment for 30 days subsequent to the meeting.

The Consolidated Plan, along with the program year 2005 Action Plan, was circulated for 30 days' public comment between March 20 and April 19, 2005 and a final public hearing on the plan was held in April 2005. The County Council adopted the plan by motion at a public meeting on May 4, 2005.

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.

6. Interagency Consultations. In developing the Consolidated Plan and program year 2005 Action Plan, Snohomish County staff consulted consortium member jurisdictions and with a variety of public and private agencies which provide assisted housing, health services and social 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 were invited to attend three public hearings at which comments on development of the Consolidated Plan and the program year 2005 Action Plan were sought.

In addition to the required public hearings, Snohomish County has considered the results of several public processes portions of which relate to housing, social service or community development issues. Principal among these has been the public input generated by the County's 10-year update to its General Policy Plan as mandated the State Growth Management Act (GMA). 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 extensive public participation process pursued during update of the GPP included a variety of procedures. The public participation in the plan's development 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 the County's Human Services Department, which is active in many areas which touch on housing and non-housing public service delivery. The department describes its purview as including "programs which assist those with economic disadvantages, those with functional disabilities such as the frail elderly, and physically disabled, those with developmental disabilities, those with acute or chronic mental illness, and those at risk or suffering from substance abuse." 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. In addition, the department notes that it "benefits directly from the advice and support of the numerous boards, task forces, committees and groups that lend their experience, expertise and judgment to the programs which they serve." Because of interdepartmental consultations between Human Services Department staff and Planning and Development Services staff during preparation of the Consolidated Plan, the plan benefited from the results of the Human Services public participation initiatives.

Indirect public participation also comes to the County through resident councils operated by the Housing Authority of Snohomish County and the Everett Housing Authority. The councils are actively involved with management and policy issues affecting the authorities' multi-family and scattered-site properties and so exert influence on the authorities' overall policies and priorities in this area. This influence is reflected in programs for which the authorities seek 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, a group of 60 representatives from City and County government, non-profit agencies, advocacy groups, Indian tribes, service providers, (homeless, mental health, HIV/AIDS, and other disabled populations), housing authorities and developers, and philanthropic organizations, manages Continuum of Care planning. Working together and meeting monthly, the partners have been able to improve coordination of advocacy, 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 homeless funds. The task force has been directly involved in development of the 2005-2009 Housing and Community Development Consolidated Plan and the program year 2005 Action Plan. Additionally, the work of the task force feeds directly into the consolidated planning process because Snohomish County's departments of Human Services and Planning and Development Services, who are also responsible for preparing the plans, share staffing of the task force.

Another critical partner in the consolidated planning process has been the Housing Consortium of Everett and Snohomish County (the Consortium), an outgrowth of a

Healthy Communities initiative sponsored by Snohomish County Tomorrow (SCT) in the 1990s. SCT is a committee comprising representatives of City, County and private sector interests that serves in an advisory capacity to Snohomish County government on issues surrounding implementation of the State's Growth Management Act. Membership of the Consortium includes representatives of City and County government, the lending industry, affordable housing providers, and social service providers. The committee, meeting monthly, focuses on issues of particular interest to affordable housing providers including funding, leveraging of local resources, and evaluation of affordable housing needs countywide. Several members of the County's Office of Housing and Community Development sit on the Consortium, providing a direct conduit into the consolidated planning process.

The Community Housing Resource Board (CHRB) of Everett and Snohomish County was also consulted during the consolidated planning process. Members of the CHRB include the Association of Realtors, the Rental Housing Mediation Service, the City of Everett, Snohomish County, the Everett Housing Authority, Snohomish County Housing Authority, the Homeless Policy Task Force, the Navy Housing Office, HUD, and several local banks. The CHRB meets every other month and focuses on disseminating information on Fair Housing Laws and Landlord/Tenant laws. It accomplishes this primarily through distributing printed materials in a variety of languages and conducting an average of six seminars per year for education of landlords about fair housing issues.

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

7. Program Funds. The Community Development Block Grant, HOME Investment Partnership (including American Dream Downpayment Initiative funds) and Emergency Shelter Grant funds to be allocated to the County by HUD become available July 1 of each fiscal year. The application process begins about September of the fiscal year preceding the July 1 commencement date with an omnibus Notice of Funding Availability (NOFA), with an exception for Emergency Shelter Grant as noted below. Between October and January, applications are reviewed and evaluated by staff and eligible ones are presented to the Technical Advisory Committee (TAC) for consideration, normally in January or February. The TAC ranks the projects based on specific criteria such as how well the proposed projects address one or more strategies in the County's Consolidated Plan, its Continuum of Care plan, readiness to proceed, its viability, and its integration with other related activities. The TAC makes funding recommendations that are then forwarded to the Housing and Community Development Policy Advisory Board (PAB) for final consideration, usually in early March. (Refer to section I. 4, "Institutional Structure", for a fuller discussion of the roles and constitutions of the TAC and PAB.) After a thirty-day public comment period on the PAB's actions, the Snohomish County Council acts on the funding recommendations. Council action normally occurs early in May and the package of proposed allocations is presented to HUD by mid-May. HUD has 45 days to approve or request modifications of the package and the program year commences July 1.

Community Development Block Grant. CDBG funds may be expended in three areas: public services, administration and planning, and capital projects. Public services (primarily supportive services for low income persons or persons with families and special needs groups including but not limited to the disabled, frail elderly, victims of domestic abuse, abused children and the homeless) may account for no more than 15% of the consortium's allocation; planning (related to housing and community development needs of low income neighborhoods and populations) and CDBG program administrative costs are similarly capped at 20%. The bulk (at least 65%) of the CDBG allocation is available for investments such as street improvements, building acquisition, site improvements, capital housing rehabilitation, and facility rental and lease payments. Snohomish County allocates the federally mandated minimum 65% to these categories. Of that amount representing 65% of the total CDBG allocation, it is current County practice that 55% will be dedicated to non-housing capital projects and 45% will be dedicated to housing capital projects.

Emergency Shelter Grant. The purpose of the ESG program is to aid homeless persons by providing emergency shelter and related support services. In addition to emergency housing, examples of activities eligible for ESG assistance include childcare, housing referral, rental and utility assistance, employment training and health care. These services are offered to shelter residents to help them regain their independence. Normally, ESG funding commitments are made for a period of two years so are a part of the NOFA in alternate years. However, second-year funding recommendations are reviewed and evaluated by the TAC, PAB and Council the second year of each two-year cycle.

HOME Investment Partnership. Activities eligible for HOME assistance are focused on four principal program areas: (1) home ownership; (2) home owner property rehabilitation; (3) rental housing development; and (4) tenant-based rental assistance. These program areas share equal priority in Snohomish County's Housing and Community Development 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.

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 passes 21% of its annual HOME allocation on to the City.

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 intends no forms of investment other than those described in 24 CFR 92.205 (b).

Affirmative Marketing. Snohomish County requires that applicants for HOME funding submit an affirmative marketing plan for proposed projects; evaluation of those plans comprises one of the scoring criteria by which proposals are ranked. Contracts governing approved projects all contain clauses requiring affirmative marketing and County staff test for compliance during on-site monitoring visits.

Minority/Women's Business Outreach. Language is included in every bid specification for construction of grant projects to ensure Minority and Women Business Enterprise participation.

On any construction project of \$50,000 or more, the bidding contractor must submit documentation to demonstrate a good faith effort to meet the 7.7% MBE goal in enlisting minority subcontractors or suppliers. Failure to do so results in the bid being rejected as non-responsive.

Snohomish County provides a list of businesses that have been identified as minority and women businesses. This list is maintained and updated constantly.

In addition, Snohomish County is a sponsoring member of the National Association of Women in Construction, an international association that promotes and supports the advancement and employment of women in the construction field.

Finally, all agencies receiving grant funds are held to the following contract provisions:

"No person shall on the grounds of race, color, religion, national origin, or sex, be excluded from participation in or denied the benefits of, or be otherwise subjected to discrimination under any program or activity funded in whole or in part under this Agreement. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 or with respect to an otherwise qualified handicapped individual as provided in Section 504 of the Rehabilitation Act of 1973 shall also apply to any such program or activity.

"The Agency shall take affirmative action to overcome the effects of any prior discriminatory practice which tends on the grounds of race, color, national origin, or sex to exclude individuals from participating in, to deny them the benefits of, or to subject them to discrimination under the project

“The Agency shall take affirmative action to overcome the effects of conditions that would otherwise result in limiting participation by persons of a particular race, color, national origin or sex.”

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).

Within the HOME program, HUD has 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 intends that the funds be used to increase the rates of homeownership among low- and moderate-income persons. To accomplish this goal, Snohomish County works with the private non-profit organization HomeSight. The anticipated accomplishments for HomeSight are set forth in HUD’s Table 3 format at the end of the Action Plan incorporated in Section 3 of this document.

HUD requires that the County 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, HomeSight works with the Everett Housing Authority and the Housing Authority of Snohomish County (HASCO) to provide home ownership opportunities to residents of publicly owned housing and of Section 8 housing. HomeSight has been working with both Housing Authorities on the Section 8 to Homeownership program since 2001. Since the inception of the program 17 recipients of Section 8 assistance have closed on homes and 117 have received home ownership counseling and education.

HomeSight is presently working with the Everett Housing Authority (EHA) on the Parkridge condominium conversion project. EHA purchased Parkridge in February of this year and is reaching out to the present low-income tenants to inform them of the home ownership assistance opportunities available in Snohomish County through HomeSight. HomeSight has presented one outreach meeting to tenants to date, which six households attended, and has scheduled further outreach meetings. Parkridge has 60 units.

Because of the strong partnership between HomeSight and the two Public Housing Authorities located in Snohomish County, public housing tenants have access to information about home ownership counseling and education and purchase assistance that HomeSight offers.

In late 2004 HomeSight launched its minority outreach marketing strategy. HomeSight began advertising on Snohomish County buses in Russian, Spanish, Vietnamese, and Mandarin Chinese. HomeSight staff members speak all of those languages except Russian, and HomeSight has access to translation services for clients who need them.

HUD ADDI 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. In compliance, Snohomish County will route its ADDI funds through its existing homeownership assistance program administered by HomeSight. HomeSight provides one-on-one financial counseling and homebuyer education to first-time homebuyers. Recipients of Snohomish County's first-time homebuyer assistance must graduate from HomeSight's education and counseling program and must be approved by HomeSight's underwriters. HomeSight's underwriting guidelines are thoroughly professional, and its two underwriters each have more than 25 years of banking experience.

As part of its overall commitment to developing program evaluation tools, the County will also assess the efficacy of its allocation of ADDI funds to HomeSight based on performance measures including the following.

- HomeSight historically has provided at least 12 outreach meetings in Snohomish County every year to educate prospective first-time homebuyers about available education, counseling, and purchase assistance programs.
- HomeSight has also historically provided six in-depth first-time homebuyer courses that are six-and-a-half hours long in Snohomish County every year. This daylong course covers topics vital to successful home ownership: avoiding predatory lending, home maintenance, and other topics.
- HomeSight since 1998 has provided one-on-one financial counseling to prospective first-time homebuyers who seek it in Snohomish County. HomeSight historically has tracked and will continue to track the number of loans and the dollar amounts that go to first-time homebuyers.

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 administers the HOPWA program for the Seattle Eligible Metropolitan Area (EMA), which includes all of King, Snohomish and Island counties. An AIDS Housing Committee representing jurisdictions and providers from throughout the EMA sets policies for allocation of HOPWA funds.

8. Monitoring Plan. Monitoring of all activities assisted in whole or in part with HUD funds administered by Snohomish County and the City of Everett pursuant to this Plan will be carried out by staff on the County Department of Planning and Development Services and the City of Everett Department of Community Development, respectively, in accord 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 of Everett'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. 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 Strategic 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. It is the County's goal to monitor projects every 2 years after completion, or more often if required by regulation.

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