

October 03, 2024

BCC Agenda Date/Item: _____

Board of Commissioners
 Clackamas County

Approval of a Grant Application to the US Department of Housing and Urban Development Pathways to Removing Obstacles to Housing program for removal of affordable housing barriers within the City of Milwaukie. Anticipated Grant Value is \$6,500,000 for 5 years. Funding is through the US Department of Housing and Urban Development. No County General Funds are involved.

| | | | |
|-------------------------------------|--|---------------------------|--------------|
| Previous Board Action/Review | Briefed at Issues: 10/01/2024 | | |
| Performance Clackamas | This funding aligns with the County’s strategic priority to ensure safe, healthy, and secure communities by addressing barriers to producing affordable housing. | | |
| Counsel Review | No | Procurement Review | No |
| Contact Person | Shannon Callahan, Director of Housing & Community Dev. | Contact Phone | 971-480-0189 |

EXECUTIVE SUMMARY: The Housing & Community Development Division (HCDD) of the Health, Housing and Human Services Department requests approval to apply to the US Department of Housing and Urban Development (HUD) for up to \$6,500,000 in Pathways to Removing Obstacles to Housing (PRO Housing) grant funding to remove barriers to affordable housing in Milwaukie through partnership with the City of Milwaukie and Housing Authority of Clackamas County (HACC).

HUD PRO Housing is a competitive grant program providing financial support to communities that are actively taking steps to remove barriers to affordable housing and seeking to increase housing production and lower housing costs over the long term.

As HUD values partnerships in scoring applicants, Clackamas County has partnered with the City of Milwaukie. If awarded, staff proposes to allocate grant funding to three projects within the City of Milwaukie: \$3.5 million for Phase 2 of the Hillside Park Redevelopment which will provide approximately 225 units of affordable housing to replace aging public housing units, \$2.0 million for the acquisition of up to 15 homes located in the City for affordable homeownership through a community land trust model, and \$1.0 million for predevelopment activities for the Sparrow Street project, a 1.98-acre property purchased by the City for affordable housing development.

The application deadline is October 15, 2024. Although the grant has no matching fund requirement, the application will note the \$5.5M in Regional Affordable Housing Bond funds to be allocated to the Hillside Park Phase 2 project to increase the scoring potential for the application. No County General Funds are involved.

For Filing Use Only

RECOMMENDATION: The staff respectfully requests that the Board of County Commissioners approve this request to apply for the HUD PRO Housing grant and authorize Chair Smith to sign on behalf of Clackamas County.

Respectfully submitted,
Rodney A. Cook

Rodney A. Cook
Director of Health Housing and Human Services

ATTACHMENTS: Lifecycle form and HUD certification documents for application

Financial Assistance Application Lifecycle Form

Use this form to track your potential award from conception to submission.

Sections of this form are designed to be completed in collaboration between department program and fiscal staff.

If renewal or direct appropriation, complete sections I, II, IV & V only. Section III is not required.

If Disaster or Emergency Relief Funding, EOC will need to approve prior to being sent to the BCC

****CONCEPTION****

Section I: Funding Opportunity Information - To Be Completed by Requester

Award type: Direct Appropriation (no application)
 Subrecipient Award Direct Award

Award Renewal? Yes No

| | |
|-------------------------------------|---|
| Lead Fund # and Department: | 240 – Health Housing and Human Services (H3S) |
| Name of Funding Opportunity: | HUD PRO Housing Funding Opportunity |

Funding Source: Federal – Direct Federal – Pass through State Local

| | |
|--|-------------------------------------|
| Requestor Information: (Name of staff initiating form) | Mark Sirois |
| Requestor Contact Information: | marksir@clackamas.us |
| Department Fiscal Representative: | Darren Chilton |
| Program Name & Prior Project #: (please specify) | HUD PRO Housing Funding Opportunity |

Brief Description of Project:

The Clackamas County Housing and Community Division of the Health, Housing and Human Services Department, in partnership with the City of Milwaukie, is requesting approval to apply and accept funding for up to \$6,500,000 in HUD PRO Housing Funding. The HUD Pathways to Removing Obstacles to Housing (PRO Housing) is a competitive grant program providing financial support to communities that are actively taking steps to remove barriers to affordable housing and seeking to increase housing production and lower housing costs over the long term.

Name of Funding Agency:

Notification of Funding Opportunity Web Address:

OR

Application Packet Attached: Yes No

Completed By: _____ Date: _____

**** NOW READY FOR SUBMISSION TO DEPARTMENT FISCAL REPRESENTATIVE ****

Section II: Funding Opportunity Information - To Be Completed by Department Fiscal Rep

Competitive Application Non-Competing Application Other

| | | | |
|---|-------------------|---|--|
| Assistance Listing Number (ALN), if applicable: | N/A | Funding Agency Award Notification Date: | February 10, 2025 |
| Announcement Date: | June 26, 2024 | Announcement/Opportunity #: | FR-6800-N-98 |
| Grant Category/Title | PRO Housing | Funding Amount Requested: | \$6,500,000 |
| Allows Indirect/Rate: | N/A | Match Requirement: | N/A |
| Application Deadline: | October 15, 2024 | Total Project Cost: | \$6,500,000 |
| Award Start Date: | February 10, 2025 | Other Deadlines and Description: | 15-Period Public Comment Period Required Before Submission |
| Award End Date | September, 2030 | | |
| Completed By: | September, 2030 | Program Income Requirements: | Households up to 80% AMI |
| Pre-Application Meeting Schedule: | N/A | | |

Additional funding sources available to fund this program? Please describe:
 Low Income Housing Tax Credits (LIHTCs), Private Activity Bonds, State and Local funding sources, Grants

How much General Fund will be used to cover costs in this program, including indirect expenses?
 No County General Funds are involved

How much Fund Balance will be used to cover costs in this program, including indirect expenses?
 N/A

In the next section, limit answers to space available.

Section III: Funding Opportunity Information - To Be Completed at Pre-Application Meeting by Dept Program and Fiscal Staff

Mission/Purpose:

1. How does the grant/funding opportunity support the Department and/or Division's Mission/Purpose/Goals?

Clackamas County is working to reduce identified barriers to affordable housing production in the City of Milwaukie by directly funding three projects: \$3.5 million to fund Phase 2 of the Hillside Park Redevelopment, an approximately 225-unit affordable housing project in predevelopment, \$2.0 million to fund the acquisition of up to 15 homes located in the City of Milwaukie for affordable homeownership through a community land trust, and \$1.0 million to fund predevelopment work for the Sparrow Street project, a 1.98-acre property purchased by the City of Milwaukie for affordable housing.

2. Who, if any, are the community partners who might be better suited to perform this work?

N/A

3. What are the objectives of this funding opportunity? How will we meet these objectives?

Communities nationwide are suffering from a lack of affordable housing, and housing production is not meeting the increasing demand for accessible and available units in many urban and rural areas, particularly areas of high opportunity.

Pathways to Removing Obstacles to Housing (PRO Housing) supports communities who are actively taking steps to remove barriers to affordable housing.

4. Does the grant/financial assistance fund an existing program? If yes, which program? If no, what is the purpose of the program?

This grant funding is intended to support projects, programs and activities that reduce barriers to affordable housing production. Identified barriers in Milwaukie include a lack of available land for multifamily housing, limited public subsidy for affordable housing production, and limited affordable homeownership opportunities due to increasing housing prices. This grant will allow for the County and City to support three housing projects- Hillside Park Phase 2, creating an affordable homeownership community land trust, and funding predevelopment activities for the Sparrow Street Project, which is owned by the City with the intent to partner on a affordable housing development.

Organizational Capacity:

1. Does the organization have adequate and qualified staff? If no, can staff be hired within the grant/financial assistance funding opportunity timeframe?

Yes

2. Are there partnership efforts required? If yes, who are we partnering with and what are their roles and responsibilities?

Partnership efforts related to this grant will mainly be between HCDD and HACC and coordination with the City of Milwaukie related to allocating the grant funds especially for pre-development work on the Sparrow Site. HACC is the current landowner of Hillside Park and up to 15 public housing properties within the City that will be disposed through HUD's Section 18 Disposition Program. The City of Milwaukie owns the Sparrow Site property. If awarded, HCDD proposes to allocate grant funding to three projects and work with HACC and the City of Milwaukie on tracking expenditure reporting for HUD.

3. If this is a pilot project, what is the plan for sun setting the project and/or staff if it does not continue (e.g. making staff positions temporary or limited duration, etc.)?

N/A

4. If funded, would this grant/financial assistance create a new program, does the department intend for the program to continue after initial funding is exhausted? If yes, how will the department ensure funding (e.g. request new funding during the budget process, supplanted by a different program, etc.)?

No, this will add to other funding sources to further the redevelopment of Hillside Park Phase 2, affordable homeownership community land trust, and will provide pre-development funding for the City-owned Sparrow Site project.

Collaboration

1. List County departments that will collaborate on this award, if any.

N/A

Reporting Requirements

1. What are the program reporting requirements for this grant/funding opportunity?

The award will be subject to post award reporting requirements reflected in Appendix XII to 2 CFR part 200, Award Terms and Conditions for Recipient Integrity and Performance Matters.

2. How will performance be evaluated? Are we using existing data sources? If yes, what are they and where are they housed? If not, is it feasible to develop a data source within the grant timeframe?

Priorities for this funding are that the project can be delivered on schedule, on budget, and in adherence with the approved scope.

3. What are the fiscal reporting requirements for this funding?

Quarterly fiscal reporting for each project upon commencement of expenditure of funds

Fiscal

1. Are there other revenue sources required, available, or will be used to fund the program? Have they already been secured? Please list all funding sources and amounts.

Metro Housing Bonds, OHCS LIFT funds, project rent revenues Low Income Housing Tax Credits, state private activity bonds and other funding sources.

2. For applications with a match requirement, how much is required (in dollars) and what type of funding will be used to meet it (CGF, In-kind, local grant, etc.)?

Financial leverage will be scored for up to 50% of the grant award. Clackamas County plans to commit \$5.5 million through it's allocation of Metro Housing Bond funds to Hillside Park Phase 2, which will serve as financial leverage for the grant application.

3. Does this grant/financial assistance cover indirect costs? If yes, is there a rate cap? If no, can additional funds be obtained to support indirect expenses and what are those sources?

No

Other information necessary to understand this award, if any.

Program Approval:

Mark Sirois

9-19-2024

Mark Sirois

Name (Typed/Printed)

Date

Signature

**** NOW READY FOR PROGRAM MANAGER SUBMISSION TO DIVISION DIRECTOR ****

****ATTACH ANY CERTIFICATIONS REQUIRED BY THE FUNDING AGENCY. COUNTY FINANCE OR ADMIN WILL SIGN****

Section IV: Approvals

DIVISION DIRECTOR (or designee, if applicable)

| | | |
|----------------------|---------|-------------------------|
| Shannon Callahan | 9/19/24 | <i>Shannon Callahan</i> |
| Name (Typed/Printed) | Date | Signature |

DEPARTMENT DIRECTOR (or designee, if applicable)

| | | |
|----------------------|--------------|--|
| Denise Swanson | Sep 23, 2024 | <i>Denise Swanson</i> Denise Swanson (Sep 23, 2024 17:56 PDT) |
| Name (Typed/Printed) | Date | Signature |

FINANCE ADMINISTRATION

| | | |
|----------------------|--------------|--------------------------|
| Elizabeth Comfort | Sep 24, 2024 | <i>Elizabeth Comfort</i> |
| Name (Typed/Printed) | Date | Signature |

EOC COMMAND APPROVAL **WHEN NEEDED FOR DISASTER OR EMERGENCY RELIEF APPLICATIONS ONLY**

| | | |
|----------------------|------|-----------|
| | | |
| Name (Typed/Printed) | Date | Signature |

Section V: Board of County Commissioners/County Administration

(Required for all grant applications. If your grant is awarded, all grant awards must be approved by the Board on their weekly consent agenda regardless of amount per local budget law 294.338.)

For applications \$150,000 and below:

| | | |
|----------------------|-----------|-----------|
| COUNTY ADMINISTRATOR | Approved: | Denied: |
| Name (Typed/Printed) | Date | Signature |

For applications up to and including \$150,000 email form to BCC staff at CA-Financialteam@clackamas.us for Gary Schmidt's approval.

For applications \$150,000.01 and above, email form with Staff Report to the Clerk to the Board at ClerktotheBoard@clackamas.us to be brought to the consent agenda.

BCC Agenda item #:

Date:

OR

Policy Session Date:

County Administration Attestation

County Administration: re-route to department at
and
Grants Manager at financegrants@clackamas.us
when fully approved.

Department: keep original with your grant file.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

*** 2. Type of Application:**

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

Completed by Grants.gov upon submission.

4. Applicant Identifier:

5a. Federal Entity Identifier:

NVWKAVB8JND6

5b. Federal Award Identifier:

FR-6800-N-98

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Clackamas County

* b. Employer/Taxpayer Identification Number (EIN/TIN):

93-6002286

* c. UEI:

d. Address:

* Street1:

2051 Kaen Road #245

Street2:

* City:

Oregon City

County/Parish:

* State:

OR

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

97045

e. Organizational Unit:

Department Name:

Health, Housing and Human Services

Division Name:

Housing and Community Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

Mark

Middle Name:

* Last Name:

Siros

Suffix:

Title:

Program Manager

Organizational Affiliation:

* Telephone Number:

503 351-7240

Fax Number:

503-655-8563

* Email:

Marksir@clackamas.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

US Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14-023

CFDA Title:

Community Development Block Grant- PRO Housing Competition

*** 12. Funding Opportunity Number:**

FR-6800-N-98

* Title:

FY-24 Pathways to Removing Obstacles to Housing (PRO Housing)

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Milwaukie

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Reducing barriers to affordable housing production in the City of Milwaukie, Oregon

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant **5,3**

* b. Program/Project **5**

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: **2-10-2025**

* b. End Date: **9-1-2030**

18. Estimated Funding (\$):

| | |
|---------------------|---|
| * a. Federal | \$6,500,000 |
| * b. Applicant | |
| * c. State | |
| * d. Local | |
| * e. Other | \$5,500,000 (Metro Housing Bond) |
| * f. Program Income | |
| * g. TOTAL | \$11,000,000 |

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

**** I AGREE**

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed:










H3S-HCD_Lifecycle_Fund 240_HUD PRO Housing Lifecycle Form_DE.EF.MS

Final Audit Report

2024-09-24

| | |
|-----------------|--|
| Created: | 2024-09-23 |
| By: | Qudsia Sediq (QSediq@clackamas.us) |
| Status: | Signed |
| Transaction ID: | CBJCHBCAABAAvqQnzh3JKxpgr7ZKX1jvS1uIBSzcBJTU |

"H3S-HCD_Lifecycle_Fund 240_HUD PRO Housing Lifecycle Form_DE.EF.MS" History

-  Document created by Qudsia Sediq (QSediq@clackamas.us)
2024-09-23 - 11:13:45 PM GMT- IP address: 198.245.132.3
-  Document emailed to dswanson@clackamas.us for signature
2024-09-23 - 11:16:20 PM GMT
-  Email viewed by dswanson@clackamas.us
2024-09-24 - 0:55:11 AM GMT- IP address: 172.223.197.184
-  Signer dswanson@clackamas.us entered name at signing as Denise Swanson
2024-09-24 - 0:56:21 AM GMT- IP address: 172.223.197.184
-  Document e-signed by Denise Swanson (dswanson@clackamas.us)
Signature Date: 2024-09-24 - 0:56:23 AM GMT - Time Source: server- IP address: 172.223.197.184
-  Document emailed to Elizabeth Comfort (ecomfort@clackamas.us) for signature
2024-09-24 - 0:56:25 AM GMT
-  Email viewed by Elizabeth Comfort (ecomfort@clackamas.us)
2024-09-24 - 1:13:30 AM GMT- IP address: 198.245.132.3
-  Document e-signed by Elizabeth Comfort (ecomfort@clackamas.us)
Signature Date: 2024-09-24 - 5:48:45 PM GMT - Time Source: server- IP address: 73.164.132.109
-  Agreement completed.
2024-09-24 - 5:48:45 PM GMT

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* First Name:

Mark

Middle Name:

* Last Name:

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Suffix:

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Program Manager

Organizational Affiliation:

* Telephone Number:

503 351-7240

Fax Number:

503-655-8563

* Email:

Marksir@clackamas.us

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Type of Applicant 2: Select Applicant Type:

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View Attachments

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| * b. Applicant | |
| * c. State | |
| * d. Local | |
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| * f. Program Income | |
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Yes No

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**** I AGREE**

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:
Middle Name:
* Last Name:
Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

PRO HOUSING CERTIFICATIONS FOR ENTITLEMENT LOCAL GOVERNMENT APPLICANTS

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

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

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

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

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

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

Consistency with plan --The housing activities to be undertaken with PRO Housing funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

Build America, Buy America (BABA) – It will comply with Title IX, Subpart A of the Infrastructure Investment and Jobs Act of 2021 (41 U.S.C. 8301 et seq.).

Public Participation – It is in full compliance with the PRO Housing streamlined public participation requirements found in Section VI.E of the PRO Housing NOFO.

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

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

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

1. Maximum Feasible Priority. With respect to activities expected to be assisted with PRO Housing funds, it has developed its proposal so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The proposal may also include activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional PRO Housing Certification).
2. Overall Benefit. The aggregate use of PRO Housing funds shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons.
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with PRO Housing funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

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

Excessive Force -- It has adopted and is enforcing:

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

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

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K and R; and EPA's lead-based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

Compliance with RFRA -- The grant will be conducted and administered in conformity with the requirements of the Religious Freedom Restoration Act (42 U.S.C. 2000bb) and 24 CFR 5.109, allowing the full and fair participation of faith-based entities.

Environmental Review -- It will comply with environmental review procedures and requirements at 24 CFR parts 50 and 58.

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

Signature of Authorized Official

Date

Printed Name and Title of Authorized Official