

# Agenda Report

May 14, 2012

**TO: CITY COUNCIL**

**FROM: HOUSING DEPARTMENT**

**SUBJECT: PUBLIC HEARING: APPROVAL OF A SUBSTANTIAL AMENDMENT TO THE 2011 – 2012 ANNUAL ACTION PLAN TO ALLOCATE THE INCREASE IN THE EMERGENCY SHELTER GRANT FUNDING.**

## **RECOMMENDATION:**

It is recommended that the City Council, following the public hearing, adopt a resolution approving the submission to the U.S. Department of Housing and Urban Development (HUD), of a Substantial Amendment to the 2011-2012 Annual Action Plan as described in this agenda report.

## **BACKGROUND:**

The Emergency Shelter Grant (ESG) Program is a federally funded program through the U.S. Department of Housing and Urban Development (HUD), which addresses homelessness. The ESG Program was designed to help improve and maintain the quality of existing emergency shelters for the homeless, assist emergency shelters meet their operating expenses and to provide certain essential social services to homeless individuals.

On December 5, 2011, HUD revised the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaces the Emergency Shelter Grants program. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

On January 27, 2012 HUD released additional funding allocations for Fiscal Year (FY) 2011 ESG programs for the ESG grants. As a result of the Program Change the City received an additional \$55,940. To receive the additional funding allocation, the City of Pasadena must prepare, and obtain HUD approval through a Substantial Amendment to its FY2011 Annual Action Plan.

City Staff is recommending that the allocation of the additional funds be used as follows:

<b>Activity Type</b>	<b>Obligated Amount</b>
ECPAC-Emergency Solutions Homeless Prevention Project	\$25,000
Door of Hope- Rapid Re-Housing program for Homeless Families with Children	\$25,000
Administrative Activities	\$1,940
HMIS Management	\$4,000
<b>Total FY 2011 Award</b>	<b>\$55,940</b>

The Emergency Solutions Homeless Prevention Project is designed to keep individuals/families in affordable, safe housing by utilizing collaborations with social service agencies, case management and rental assistance to keep individuals and families housed and out of homelessness. The Rapid Re-Housing Program for Homeless Families with Children is designed to move homeless families into permanent supportive housing and provide them assistance in remaining housed and avoiding a return to homelessness.

**COUNCIL POLICY CONSIDERATION:**

This proposed action supports the City Council Strategic Planning Three-Year Goals specifically in the area of supporting the quality of life and the local economy.

**FISCAL IMPACT:**

Approval of the subject recommendation will increase the amount of ESG funds allocated to the City, by \$55,940. There is no impact to the General Fund.

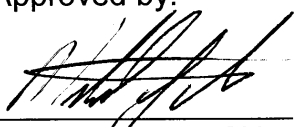
Respectfully submitted,

  
William K. Huang  
Housing Director

Prepared by:

  
Valerie Babinski-Manlic  
CDBG Program Coordinator

Approved by:

  
MICHAEL J. BECK  
City Manager

Attachments:

Exhibit A- Substantial Amendment  
Draft of the 2011-2012 Substantial Amendment in the City Clerk's Office

# City of Pasadena, California

## Emergency Solutions Grant (ESG) FY2011 Second Allocation

### Substantial Amendment

**Overview**

On November 15, 2011, the U.S. Department of Housing and Urban Development (HUD) posted the revisions for the Emergency Solutions Grant (ESG) program and the Consolidated Plan conforming amendments (24 CFR Part 91) on HUD's Homelessness Resource Exchange Web site @ [www.hudhre.info](http://www.hudhre.info). Per the Federal Register, HUD set out requirements for ESG recipients to consult with the Continuum of Care (CoC) regarding:

- (1) How to allocate ESG funds for eligible activities;
- (2) Development of performance standards for ESG funded activities;
- (3) Development for funding, policies, and procedures for the operation; and,
- (4) Administration of the Homeless Management Information System.

On December 5, 2011, HUD posted the Interim Rule in the Federal Register for regulations regarding the Emergency Solutions Grants program. This Interim Rule: *"revises the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaces the Emergency Shelter Grants program. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness."*

On January 27, 2012 HUD announced the amounts of the second allocation of Fiscal Year (FY) 2011 ESG programs for the ESG grants. To receive funds for the second allocation, the City of Pasadena must prepare, and obtain HUD approval through a Substantial Amendment to its FY2011 Annual Action Plan.

In FY2011 HUD used its discretion to allocate the FY2011 ESG funds in two allocations as program regulations for the ESG were not fully revised. The FY2011 1st allocation of ESG funds are subject to Emergency Shelter Grants regulations in effect at the time of release. The 1st allocation is equal to FY2010.

**1. City of Pasadena's Declaration to HUD of FY11 Grant Fund Commitments**

Activity Type	Obligated Amount
ECPAC-Emergency Solutions Homeless Prevention Project	\$25,000
Door of Hope- Rapid Re-Housing program for Homeless Families with Children	\$25,000
Administrative Activities	\$1,940
HMIS Management	\$4,000
<b>Total FY 2011 Award</b>	<b>\$55,940</b>

## 2. ESG Grantee Information

ESG Program Administrator Contact Information	
Name (Last, First)	Babinski, Valerie A.
Email Address	vbabinski@cityofpasadena.net
Phone Number	(626) 744-8321
Mailing Address	100 N. Garfield Ave., P.O. Box 7115, Pasadena, CA 91109

## 3. Summary of Consultation Process

The City has a long history spent in partnership with Continuum of Care (CoC) members and is the grantee agency and lead applicant for the CoC application. City staff is the co-chair of the Housing & Homeless Network (Network), Pasadena's principal planning entity for homeless services. In regards to HUD's new ESG definitions and categories of services, the City began consultation with the Network in February 2011 to determine the most fitting appropriation of ESG funds in preparation for the expenditure of this second ESG allocation.

The City in conjunction with the CoC developed and in July 2005 City Council approved a 10-Year Plan to End Homelessness which was predicated on the model of "closing the front door and opening the back door" in order to end homelessness. This model strongly supports homeless prevention programs to "close the front door" and rapid re-housing programs to "open the back door" in order to prevent new households from becoming homeless while as quickly as possible re-housing those who are already homeless.

In 2009, the Homeless Prevention and Rapid Re-Housing Program (HPRP) model of services was established through a public process involving the CoC as represented by the Network, and other community interests. The City launched a Homeless Prevention Program in 2007, which was strengthened with the introduction of HPRP funding. The HPRP project is HUD-funded and works toward HUD's primary strategies which are to: (1) Finish the job of ending chronic homelessness in five years; (2) Prevent and end homelessness among Veterans in five years; (3) Prevent and end homelessness for families, youth and children in ten years; and, (4) Set a path to ending all types of homelessness. Through an RFP process and following consultation with the Network, the City contracted with two non-profit agencies to provide Homeless Prevention services and Rapid Re-housing Services.

Based on HUD's new eligible ESG categories for services (Street Outreach, Emergency Shelter, Homeless Prevention and Rapid Re-Housing, and Homeless Management Information System); the existing services in the CoC; the effectiveness of the existing Homeless Prevention and Rapid Re-Housing programs; and the upcoming end of the HPRP funding for the latter activities, the City and the CoC determined that continuation of Homeless Prevention and Rapid Re-housing would be the most effective use of the second allocation of ESG funding.

In order to select the agencies to administer the Homeless Prevention and Rapid Re-housing programs, the City issued a Request for Proposals (RFP). Through this RFP process, the City selected the Ecumenical Council of Pasadena Area Churches to administer the Homeless Prevention Program and Door of Hope to administer Rapid Re-Housing. The City will enter into a written agreement with the two agencies recommended for funding in order to efficiently and quickly administer the program.

The CoC is just beginning to create performance standards, and is unable to provide detailed performance standards and also be able to make the second allocation of FY11 ESG funds available quickly. For this round of ESG funds, the CoC will set a baseline and measure performance for number of households that move to permanent housing within 30 days of entering shelter; households increasing their income during program participation; and households exiting the program in permanent housing.

The City of Pasadena CoC has an existing HMIS and well-established funding, policies and procedures for the operation and administration of the HMIS. The HPRP provider used this HMIS for data collection and reporting for that program, and will continue to use the HMIS for reporting regarding use of ESG funds.

#### **4. Public Comment: Citizen Participation Process**

The City placed an advertisement in the local newspaper in English with a notation that information regarding the public hearing could be obtained in Spanish upon request. The advertisement indicated that the ESG Substantial Amendment would be available for comment for the period April 6 through May 7, 2012, and indicating where the Substantial Amendment could be accessed. On April 6, 2012, the City posted the Substantial Amendment to its website and made it available in paper form in the City's Housing Department and other various community locations.

All citizen comments will be documented and included in the submission of the Substantial Amendment to HUD.

(Summary of Public Comments Received)

#### **5. Match**

The City of Pasadena will insure that 100 percent of the Emergency Solutions Grant received is matched with equal resources. This match will be passed on to the grant recipients. The match may be cash or an in-kind amount and cannot be counted as satisfying the matching requirement of another federal grant. Types of match that will be accepted include:

- Cash contributions expended for allowable costs including staff salaries and fringe benefits
- Noncash contributions
  - Services provided by volunteers are matched at the current minimum wage salary unless the recipient can verify a higher rate of pay for current employees performing similar work
  - Real property, equipment, goods or services that if the recipient had to pay for them with grant funds, the payments would have been indirect costs
  - The value of donated goods and services such as clothing, food, diapers, haircuts, etc. The value placed should be consistent with OMB Circulars 87 and A-122.
  - Costs paid by program income provided the costs are eligible ESG costs that supplement the recipient's ESG program.

Match documentation will be required before reimbursement will be made.

## 6. Proposed Activity

The first funding phase of FY2011 was allocated to six projects and funded Shelter Operations (Staff and non-staff), Essential Services, and Administrations costs. The City proposes to use the second allocation of FY2011 ESG funds on funding Homeless Prevention, Rapid Re-Housing and administration costs.

## 7. Discussion of Funding Priorities

The City will spend the second allocation of FY2011 ESG funds (less Administration and funding for HMIS Data Collection) to support the homeless crisis response system that was established using HPRP funds. By appropriating Homelessness Prevention and Rapid Re-housing funds totaling \$50,000 to ECPAC and Door of Hope the monies will provide case management services as well as outreach and housing search and placement services.

The City's funding priorities for these funds is in alignment with Objective 10 of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, which is "Transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing." The City's funding priorities are also in alignment with a Citywide Needs Assessment conducted in 2011.

## 8. Detailed Budget

The City's budget for the second allocation of FY2011 ESG funds is as follows:

Activity Type	Obligated Amount
ECPAC-Emergency Solutions Homeless Prevention Project	\$25,000
Door of Hope- Rapid Re-Housing program for Homeless Families with Children	\$25,000
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<b>Total FY 2011 Award</b>	<b>\$55,940</b>

## 9. Written Standards for Providing ESG Assistance

The City, in consultation with the CoC, will be preparing comprehensive standards for providing ESG assistance over the next several months, as part of its Annual Action Plan process. In order to make critically needed prevention, diversion and rapid re-housing assistance available more quickly, it has established abbreviated standards to be applied to this second allocation of FY2011 ESG funds, which are based upon standards established for HPRP. The City's written standards for providing ESG Assistance are as follows:

**a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance.**

- Must be currently homeless or at risk of homelessness as defined in 24 CFR § 576.2.
- Case files must include a completed eligibility form and certification (which meets HUD specifications) that the household meets the eligibility criteria.
- For households meeting the definition of "at risk of homelessness", case files must include all documentation required by 24 CFR § 576.500.
- For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.
- Records must be kept for each program participant that document: the services and assistance provided to that program participant; compliance with requirements under 24 CFR §§ 576.101-106, 576.401 (a) and (b), and 576.401 (d) and (e); and, where applicable, compliance with the termination of assistance requirement in § 576.402.
- **Eligible Uses of Funds:** Funds may be used for rental application fees, security deposit, last months' rent, utility payments/deposits, moving cost assistance, and short-term rental assistance. Funds may be paid only to a third-party provider; they may not be provided directly to the person applying for assistance.

**b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and other homeless assistance providers, and mainstream service and housing providers.**

- Providers of ESG prevention/diversion and rapid re-housing assistance must
  - a. make assistance available to all eligible Pasadena households without regard to what agency provides shelter to the household;
  - b. provide clear guidance to other Pasadena providers about eligibility requirements and how to access assistance; and
  - c. undertake targeted outreach to providers who serve victims of domestic violence, and create clear pathways for their clients to access assistance.

**c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families will receive rapid re-housing assistance.**

- Assistance may be provided only to households with income at or below 30% of area median income.

**d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.**



- Program participants must pay a minimum of 30% of adjusted income for monthly rent, with the exception of the first months' rent, for which ESG can pay up to the full amount. Income will be calculated using standards in place for HPRP.
- e. **Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of assistance will be adjusted over time.**
  - The ESG program will be used only to provide short-term, time-limited assistance; there will not be any continuing eligibility review or review to determine if further ESG assistance is required.
- f. **Standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.**
  - The ESG program will not pay more than a total of 3 months rental assistance for any program participant.
  - The maximum amount of assistance for any household is \$5000.
  - Program participants may not receive assistance more than two times in any 12-month period.

## 10. Certifications

### General Certifications

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, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - (a) The dangers of drug abuse in the workplace;
  - (b) The grantee's policy of maintaining a drug-free workplace;
  - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will –
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted –
  - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

**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 consolidated plan 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 CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

#### ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

City of Pasadena, CA

ESG 2011 Second Allocation Substantial Amendment

April 6, 2012

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

**Matching Funds** – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program

**Consolidated Plan** - All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdictions' consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable, and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care, or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) 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 CDBG funds, it certifies that it has developed its Action Plan 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 Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a 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);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) , (a period specified by the grantee consisting of one, two, or three specific consecutive program years), 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 during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed 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 CDBG 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 CDBG 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 CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, 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 CDBG funds if the jurisdiction certifies that it lacks CDBG 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 USC 2000d), the Fair Housing Act (42 USC 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;

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

\_\_\_\_\_  
Signature/Authorized Official Date

\_\_\_\_\_  
City Manager  
Title

**Los Angeles County Income Limits for 2012 / Extremely Low (30% Median) Income Limits**

# of Persons Per Household	1	2	3	4	5	6	7	8
Total Income Limit	\$17,950	\$20,500	\$23,050	<b>\$25,600</b>	\$27,650	\$29,700	\$31,750	\$33,800