

Hurricane Irma: Voluntary Home Buyout Program

Florida Department of Economic Opportunity
107 E. Madison Street Caldwell Building
Tallahassee, FL 32399



This application is to be used by Units of General Local Government to apply to the Florida Department of Economic Opportunity to receive funding as a subrecipient.

APPLICANT NAME

Lee County

COUNTY

City of Bonita Springs

COG/Regional Planning Commission

DR-4332 - 2017

Disaster Declaration Number and Year

LOCAL GOVERNMENT INFORMATION

Local Government Applicant:	Bonita Springs			Eligible County:	Lee County
Local Contact:	Elly McKuen			DUNS #:	196164110
Title:	Sr Project Manager		E-mail:	Elly.mckuen@cityofbonitasprings.org	
Mailing Street Address:	9101 Bonita Beach Road			Phone Number:	239-949-6246
City:	Bonita Springs	State:	FL	Zip Code:	34135-6262
Executive Official with Authority to Sign Application:	Peter Simmons			Phone Number:	239-949-6262
Title:	Mayor		E-mail:	Peter.Simmons@cityofbonitasprings.org	
Executive Official Address (if different):					
City:		State:		Zip Code:	
Please list any other UGLG members of this Application Team, if any:		Contact Person:		Email Address:	
Please confirm you submitted a signed resolution authorizing Executive Official to sign application and certifications.				Yes:	<input type="checkbox"/>
				No:	<input type="checkbox"/>

APPLICATION PREPARER INFORMATION

Application Preparation Agency or Firm:	Aptim Environmental and Engineering			
Contact:	Shanti Copeland			
Address:	9143 Philips Hwy Jacksonville, FL 32256			
Phone Number:	850-443-3896	Email:	Shanti.copeland@aptim.com	
Check Type of Agency Preparing Application:	Private Firm:	<input checked="" type="checkbox"/>	Government Agency:	<input type="checkbox"/>
	Regional Planning Council:	<input type="checkbox"/>	Other, specify:	

APPLICATION INFORMATION

Total CDBG-DR Funding Requested:				
List jurisdictions for proposed recovery activities (municipalities, Tribal governments, unincorporated areas):	City of Bonita Springs			
Please confirm the local government covered by the National Flood Insurance Program?	Yes:	<input checked="" type="checkbox"/>	No:	<input type="checkbox"/>
Please confirm the proposed activities are consistent with the local comprehensive plan?	Yes:	<input checked="" type="checkbox"/>	No:	<input type="checkbox"/>

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Each applicant for Community Development Block Grant Disaster Recovery (CDBG-DR) funding must certify by signing Form SF-424 that local certifications included in the application guide governing this funding have been followed in the preparation of any CDBG-DR program application, and, if funded, will continue to be followed. (*Note: False certification can result in legal action against the jurisdiction*).

“Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729.”

Further, by signing the SF-424 and submitting with the application, the signee authorizes the state or any of its duly authorized representatives to verify the information contained therein. Title 18, Section 1001 of the U.S. code states that a person is guilty of a FELONY for knowingly and willingly making false statements to any department of the United States Government.

All applications must be accompanied by a completed and signed Application for Federal Assistance SF-424, OMB Number: 4040-0004, Expiration Date: 10/31/2019. SF424_2_1-V2.1

INTRODUCTION AND INSTRUCTIONS

INTRODUCTION: This application is for the Rebuild Florida Voluntary Home Buyout Program. It is to be used by Units of General Local Government (UGLGs) to apply as a subrecipient for funding of Hurricane Irma damaged residential home buyouts in the UGLG’s local community. This program is administered by the Florida Department of Economic Opportunity (DEO) and funded by the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant-Disaster Recovery (CDBG-DR) allocation as described in Public Laws 115-56 and 115-123.

CDBG-DR funds must be used for disaster-related expenses in the most impacted and distressed areas, for low-moderate-income households, with a focus on those households that did not have flood insurance at the time of Hurricane Irma.

UGLG applicants are required to provide sufficient detail about the buyout of residential property, national objective, geographic/target area that will receive benefit, estimated costs and materials needed, projected schedule to completion, any potential environmental impact, and other details specific to the buyout or activity involved. The application must be completed in its entirety in order to be considered for funding.

Applicants are encouraged to develop residential home buyout activities in a manner that considers an integrated approach to housing, fair housing obligations, economic revitalization, and overall community recovery. Applicants must document how the residential home buyout activities will address long-term recovery and promote community resilience.

Applicants are required to comply with the Federal Fair Housing Law (The Fair Housing Amendment 1988) 24 C.F.R. § 570.487(b), and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA), 42 USC 4601 – 4655, 49 CFR part 24, 24 CFR part 42, and 24 CFR 570.606.

All applicants funded as subrecipients must carry out all activities in a manner that does not result in a prohibited duplication of benefits as defined by Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5155 *et seq.*) and described in Appropriations Acts. As a funded subrecipient, all successful applicants must comply with HUD’s requirements for duplication of benefits, imposed by the Stafford Act, applicable Federal Register Notice(s), HUD’s duplication of benefit guidance, and DEO’s duplication of benefits policies and procedures. The Subrecipient shall also develop and implement duplication of benefit policies and procedures consistent with these regulatory and guidance sources. DEO will monitor each subrecipient for compliance with duplication of benefits rules, regulations, guidance, policies and procedures, as well as compliance with all other federally required cross-cutting regulations.

INSTRUCTIONS:

1. Complete and sign the SF-424 as indicated above.
2. Complete this Voluntary Home Buyout application.
3. **AUDIT:** If applicable, provide the most recent Single Audit in accordance with 2 CFR Part 200, Uniform Administration Requirements, Cost Principles, and Audit Requirements for Federal Awards. Rebuild Florida staff will review single audit requirements for applicable subrecipients, who have open contracts with DEO.
4. **ANNUAL FINANCIAL STATEMENTS:** Provide the most recent financial statement prepared in accordance with 2 CFR 200.510. Include a schedule of expenditures and schedule of findings and questioned costs.
5. **KEY STAFF:** Provide the names and contact information for staff that will provide local oversight of the application, the potential contract,

and all applicable requirements.

6. Provide LOCAL PROCUREMENT POLICIES AND PROCEDURES along with other required documentation.

For detailed instructions on completing the application, see page 14 of this application.

CITIZEN PARTICIPATION DETERMINED THE NEEDS IN THIS PLAN BY:

Did the applicant carry out citizen participation procedures in accordance with the Citizen Participation Plan as required by the governing documentation? Refer to your governing Federal Register and the Voluntary Home Buyout Program Designs for specific information regarding Citizen Participation Plans. Yes No

Detail where citizens of the target area, with low to moderate income were given opportunities to participate in the determination process.

Once the applicant clicks on the 'Opportunity' box, events may be added by clicking the "+" button located to the right

Opportunity: Canvas targeted neighborhoods by City staff handing out information on the program and inviting them to the two neighborhood meetings and the public hearing Date: 7/29/2019

Date of resolution authorizing application submission: Click or tap to enter a date.

Opportunity: Canvas targeted neighborhoods by City staff handing out information on the program and inviting them to the two neighborhood meetings and the public hearing Date: 7/30/2019

Date of resolution authorizing application submission: Click or tap to enter a date.

Opportunity: Canvas targeted neighborhoods by City staff handing out information on the program and inviting them to the two neighborhood meetings and the public hearing Date: 7/31/2019

Date of resolution authorizing application submission: Click or tap to enter a date.

Opportunity: Neighborhood Meeting addressing program and grant application including Questions/Answers from the community Date: 8/1/2019

Date of resolution authorizing application submission: Click or tap to enter a date.

Opportunity: Neighborhood Meeting addressing program and grant application including Questions/Answers from the community Date: 8/6/2019

Date of resolution authorizing application submission: Click or tap to enter a date.

Opportunity: Public Hearing – Resolution adoption by City Council to support the grant application Date: 8/7/2019

Date of resolution authorizing application submission: 8/7/2019

COMMUNITY NEEDS ASSESSMENT

DESCRIPTION OF THE NEED(S) ADDRESSED IN THIS APPLICATION

In this section, provide full and complete answers to each of the questions below. Descriptions should include the cause of the damage, current condition of the activity, and a detailed description of the project that coincides with the information contained in both Tables 1 and 2.

The Buyout or activity must demonstrate impacts from Hurricane Irma. CDBG-DR funds must be used to buyout residential areas in support of permanent open space supporting green infrastructure or other floodplain management systems.

The situation addressed in this application first occurred: 9/11/2017

1. Please describe the impact from Hurricane Irma and any subsequent flooding or storm related conditions that continue to exacerbate the flood prone areas (include date and duration), the areas (example: subdivisions, cities, etc.) receiving disaster-related damage, and the threat that was posed to public health and safety:

During, and following, Hurricane Irma, this area had as much as four feet of standing water in most of the residential and business structures for more than three weeks. The stagnation of water kept residents out of their homes, infiltrated the sanitary sewer and delayed power restoration making it extremely difficult to begin repairs and clean up following the storm. The neighborhood's elevation is lower than the surrounding area and creates a "bowl" effect for water to gravitate and settle in this area when the City experiences intense rain events.

2. Describe the impacts to the community (especially over time):

Acquisition and demolition of damaged properties will provide a means for low income residents to relocate to safe and sanitary homes. The property will forever be held as green space which may assist surrounding homes by providing additional drainage area for water to stand and percolate into the ground or become a passive park

3. Describe the proposed project.

The project is in a well-established older neighborhood and has a mix of single family, multi-family, duplexes and mobile home structures. The area is located in the center of the City of Bonita Springs. The project is identified as the Quinn Street/Downs Avenue Area. The boundary of the neighborhood is the Imperial River on the north, Lime Street on the west, Bonita Beach Road on the south and Interstate 75 on the west. The neighborhood's elevation is lower than the surrounding areas and creates a "bowl" effect for water to gravitate and settle in this area when the City experiences intense rain events. During and following, Hurricane Irma, this area had as much as four feet of standing water in most of the residential structures for more than three weeks. The stagnation of water kept residents out of their homes, making it extremely difficult to begin repairs and clean up following the storm. In addition, emergency services was not able to get into the neighborhood.

The city has not previously received disaster assistance for repair or restoration of the properties proposed for acquisition. However, the City did receive assistance from FEMA for emergency response and debris removal following the Presidential disaster declaration for Hurricane Irma on September 10, 2017.

The acquisition of the identified residential properties will provide flexibility for the residents in this area to eliminate/mitigate the possibility of encountering future flood damage caused by hurricanes in the future. In addition to future damages, this program will eliminate health and safety risks for those homeowners and any potential rescuers. This includes eliminating the need to provide emergency response services, subsidized flood insurance, and Federal disaster assistance to the residents. The acquisitions will also bring cost savings to the National Flood Insurance Program (NFIP) through reduced flood insurance claims.

The acquisition project will allow property owners an option to relocate outside of the flood prone area to avoid future flooding. Once the residential units are acquired, the City will be able to provide a safer, more secure neighborhood environment by permanently eliminating structures and providing for perpetually stormwater management that could include open space or a passive park.

4. Describe how the proposed activities will address damage affected by Hurricane Irma and a benefit to LMI if applicable.

The voluntary buyout program is made available to owners of low and moderate income households that were owners of the property at the time of Hurricane Irma, The properties experienced flooding of 4 feet or more for at least three weeks after Hurricane Irma, delaying repairs. Many of the properties continue to be unsafe and unsanitary places for families to live, This program may provide an alternative action to eligible LMI households to relocate outside of the threat of flooding and provide safe and sanitary replacement homes.

5. Describe the impact of not taking action.

Without the voluntary buyout program some LMI property owners will continue to live in homes that are considered a health/safety risk. Flood prone properties will stay in the City's floodway causing the possibility of blocking the natural flow of floodwaters.

6. List and attach materials submitted as documentation of the Hurricane Irma related condition:

AFFIRMATIVELY FURTHERING FAIR HOUSING

Any locality receiving CDBG-DR funds must certify that it will affirmatively further fair housing as stated on page 3 under "Introductions and Instructions" of this application. Using the drop-down box below, identify the activities already achieved to affirmatively further fair housing, and those new activities to be undertaken if an award is made from CDBG-DR and when that activity will be complete. Localities should be aware that, in the event of funding, these fair housing efforts will be monitored. Other activities may be eligible, and the applicant should contact Rebuild Florida to determine eligibility.

What methods and criteria were used to prioritize the projects in the application, including affirmatively furthering fair housing?

Activity(ies)

Click within the area and add events by clicking the "+" button located to the right

Establishing a local complaint and monitoring process

Date Achieved Click or tap to enter a date.

To be complete by Click or tap to enter a date.

Click within the area and add events by clicking the "+" button located to the right

Enforcing Fair Housing guidelines that are equivalent to a Fair Housing Ordinance

Date Achieved Click or tap to enter a date.

To be complete by Click or tap to enter a date.

Click within the area and add events by clicking the “+” button located to the right

Adopting and distributing Fair Housing Practices

Date Achieved Click or tap to enter a date.

To be complete by Click or tap to enter a date.

Click within the area and add events by clicking the “+” button located to the right

Choose an item.

Date Achieved Click or tap to enter a date.

To be complete by Click or tap to enter a date.

LIST OF UNMET NEEDS

Taking into consideration the disaster-related damage described, citizen participation responses, and the assessment of housing and affirmatively furthering fair housing, provide a list (in priority order) of all the disaster-related needs still unmet from Hurricane Irma.

Click within the area and add events by clicking the “+” button located to the right

Enter any content that you want to repeat, including other content controls. You can also insert this control around table rows in order to repeat parts of a table.

Enter any content that you want to repeat, including other content controls. You can also insert this control around table rows in order to repeat parts of a table.

LONG-TERM PLANNING

Applicants must develop their community recovery projects in a manner that considers an integrated approach to housing, fair housing obligations, infrastructure, economic revitalization, and overall community recovery. Long-term planning processes should also be considered. Disaster recovery presents communities with unique opportunities to examine a wide range of issues including (1) housing quality and availability, (2) road and rail networks, (3) environmental issues, (4) the adequacy of existing infrastructure, (5) opportunities for the modernization of public facilities and the built environment, (6) the development of regional and integrated systems, and (7) the stimulation of the local economy impacted by the disaster.

Applicants must provide a brief description of how the project addressed in this application forms part of an integrated approach to recovery or long-term planning efforts in the community.

Describe the applicant's overall recovery plan and how the project addressed in this application furthers that plan. Include information about how the project will specifically address the long-term recovery and restoration of housing in the most impacted and distressed areas. Include how the community will be more resilient against future disasters as a result of these projects.

PROCUREMENT INFORMATION

All applicants are required to follow the procurement guidelines set forth in 2 CFR §200.318-§200.326 for grant administration, environmental, and engineering services if using CDBG-DR funds to pay third-party vendors for those services.

Along with this application, applicants must provide a copy of local procurement policies and procedures. Further, the applicant must provide copies of any procurement solicitations, bids, awards and contracts during DEO monitoring visits.

1. Has the applicant chosen to use a third-party administrator to administer the proposed project? Yes No
- If Yes, will the vendor also provide environmental services? Yes No

If Yes to either question, and the vendor has been procured, provide the vendor's name, phone, and email.

If Yes, but the vendor has not been procured, adhere to 2 CFR §200.318-§200.326 regulations in the procurement process.

Company Name	Aptim		
Contact Name	Shanti Copeland	Phone	850-443-3896
Email	Shanti.copeland@aptim.com		

2. Has the applicant procured any other services?

Yes No

If Yes, and the vendor has been procured, provide the vendor's name, phone, and email.

If Yes, but the vendor has not been procured, adhere to 2 CFR §200.318-§200.326 regulations in the procurement process.

Type of Service			
Company Name			
Contact Name		Phone	
Email			

UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION ACT (URA)

a. Does the project require relocation assistance or any other activity requiring compliance with the URA? Yes, No or N/A

b. Will the assistance requested cause the displacement of families, individuals, farms, or businesses? Yes or No

If yes, explain	The City has targeted homeowners, property owners and landlords for the buyout project. Should an income qualified landlord sell their property to the City, the City will follow the URA requirements.
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Should any proposed projects cause the displacement of people, Rebuild Florida will work with the Subrecipient to follow the requirements set forth under the Uniform Relocation Assistance and Real Property Acquisition Policies Act, and applicable waivers.

PROJECT SUMMARY

The Project Summary consists of three parts for each target area, Disaster Risk Reduction Area designation, and/or activity: (1) summarize problem(s), (2) location and buyout description, and (3) detailed actions to address problems.

1. Summarize the problem(s) to be addressed within the application by target area.

During, and following, Hurricane Irma, this area had as much as four feet of standing water in most of the residential and business structures for more than three weeks. The stagnation of water kept residents out of their homes, infiltrated the sanitary sewer and delayed power restoration making it extremely difficult to begin repairs and clean up following the storm. The neighborhood's elevation is lower than the surrounding area and creates a "bowl" effect for water to gravitate and settle in this area when the City experiences intense rain events.

2. Identify the project title and location of each activity and all buyouts. Provide a map identifying the project location.

NOTE: For the title, the spelling and capitalization of the project titles/locations identified in this application must be consistently used throughout to ensure clear identification of each project. For example, a project title of "Big Grounds, Site 3" here should appear as "Big Grounds, Site 3" at every other reference in this application. An inconsistent reference such as "big grounds subdivision" or "#3 Big Street" elsewhere in the application could cause delays in the eligibility review process

Project Title: City of Bonita Springs Quinn/Downs Neighborhood Acquisition Program

Location:

What is the end use of the property: Passive green space and recreational areas for neighborhood youth

Incentives or Additional activities

3. Identify the action(s) to resolve the problem(s) and their anticipated outcomes. Include specific materials and quantities.

4. If you are leveraging funds, provide the source of the funds, the funding amount, and a description of its use.

NA

NATIONAL OBJECTIVES

National Objective being met:

1. Activities benefiting low- and moderate- income persons.

LMHI (Housing Incentive) LMB (Household Buyout) LMH (Area Benefit)

2. Prevention/Elimination of Slums or Blight. Area Basis Spot Basis

Yes No

Has the proposed project area been officially designated as a slum or blighted area?

If yes, what conditions are present in the area to designate and qualify the area as a slum or blighted area?

Describe the boundaries of the slum or blighted area. (Do not use this field to document the Census Tract / Block Group data.)

Enter the percentage of deteriorated buildings / properties in the area at the time it was designated a slum or blighted area (enter value as decimal).

If the activity qualifies for CDBG-DR assistance on the basis that public improvements throughout the area are in a general state of deterioration, enter a description of each type of improvement in the area and its condition at the time the area was designated as slum / blight.

Enter the year the area was designated as a slum / blighted area.

3. Urgent Need

Do the existing conditions pose a serious and immediate threat to the health or welfare of the community?

Yes No

Is the applicant able to finance the project on their own? Or are other sources of funding available?

Yes No

Provide justification of the beneficiary identification method used to meet the National Objective:

TABLE 1 - CONTRACT BUDGET AND BENEFICIARY IDENTIFICATION

Complete a separate table for each activity or target area. Only one Table 1 is needed if the same target area, beneficiaries, and national objective apply. If any of these are different, add a new Table 1. Refer to the Application Guide for instructions.

Provide comprehensive budget information to include all Other Funds (FEMA, insurance, local, etc.) committed to the proposed projects. Use the + button to add additional projects. Use the X button to remove a project.

Refer to the Application Guide for instructions.

BUDGET AND BENEFICIARY TABLE:

Activity Description:	Total Units	LMI Units	LMI %	National Objective	Total CDBG-DR Request	Other Sources	Activity Total
Buyout				LMH			
Choose an item.				Choose an item.			
Summary Total:	0	0	0.0		0		0

TABLE 2 - GRANT PROJECT BUDGET BREAKDOWN

Provide comprehensive budget information.

Project Title: City of Bonita Springs Quinn/Downs Neighborhood Acquisition Program

Activity Description	Description of Task	Funding Type	Explanation	Budget
Buyout	Choose an item.	Choose an item.		
Buyout	Choose an item.	Choose an item.		

PROJECT SCHEDULE

Highlight the projected length in months for each phase by clicking on the desired months. If a phase is not applicable, leave it blank. Projects are expected to be completed within 24 months following execution of the contract between the applicant and the DEO. Provide any comments regarding the schedule that may be helpful.

Project Title: City of Bonita Springs Quinn/Downs Neighborhood Acquisition Program

Months	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
Professional Services Procurement	---	---	---	---																					
Application & Policy Development/ Outreach Plan applicable	---	---	---	---	---	---	---																		
Broad Environmental Review					---	---	---																		
Bid Advertisement/Contract Award								---	---	---	---														
Buyout												---	---	---	---	---	---	---	---	---	---				
Mitigation Activities																		---	---	---	---	---	---		
General Administration	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Audit and Closeout																								---	---

Note: If the proposed project requires a schedule longer than 24 months, justification must be provided.

Comments:

LOCAL CERTIFICATIONS

Every application must be signed by the authorized signatory. By signing this application, the signee authorizes the state or any of its duly authorized representatives to verify the information contained herein. It should be noted that 18 USC § 1001 states that any person who (1) knowingly or willfully falsifies, conceals, or covers up by any trick, scheme, or device of material fact, (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false fact, fictitious, or fraudulent statement is a federal offense and punishable under the law. Title 18, Section 1001 of the U.S. code states that a person is guilty of a FELONY for knowingly and willingly making false statements to any department of the United States Government.

Each application for CDBG Disaster Recovery funding must also be accompanied by a completed and signed Application for Federal Assistance Standard Form 424 (SF-424).

Each applicant must comply with the provisions of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations, the requirements set forth in title 24 of the Code of Federal Regulations (CFR) part 58, and applicable DEO-Rebuild Florida policy directives. All applicable federal and state laws, including environmental, labor (Davis-Bacon), procurement procedures and contract requirements of 2 CFR 200.318 -200.326, and civil rights requirements apply to the use of these funds. Each applicant certifies, in compliance with the requirements presented in Volume 81, Number 224 of the Federal Register effective February 9, 2018, that:

- a. It has in effect and is following a residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the CDBG-DR program;
- b. It follows and is compliant with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87;
- c. It will comply with the acquisition and relocation requirements of the Uniform Act (URA), as amended, and implementing regulations at 49 CFR part 24, except where waivers or alternative requirements are provided in the Federal Register notice.
- d. 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 135.
 - It is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105 Public Participation Plan as it pertains to local government administration of CDBG-DR funds. or 91.115 Public Participation Plan as it pertains to State administration of CDBG-DR funds., as applicable (except as provided for in notices providing waivers and alternative requirements for this grant). Also, each Unit of General Local Government (UGLG) receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in notices providing waivers and alternative requirements for this grant). It is the responsibility of the UGLG receiving assistance to develop and implement a compliant citizen participation plan.
 - Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, and economic revitalization in the most impacted and distressed areas for which the President declared a major disaster in 2017 pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 ((42 U.S.C. 5121 *et seq.*) related to the consequences of Hurricane Irma.
 - 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, and that it will affirmatively further fair housing.

a. It has adopted the following policies:

- i. 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

- ii. A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.

Date _____

Printed Name _____

Title _____

Email _____

Phone Number _____

Authorized Signature _____