

City of Spokane, CHHS Department

CDBG Policies & Procedures

2024 Program Year



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Department Contact Information

City of Spokane Community, Housing and Human Services Department (CHHS)

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 Spokane, WA 99201
 (509) 625-6325
spokanechhs@spokanecity.org
 Hours: M-F, 8:00 AM to 5:00 PM
<https://my.spokanecity.org/chhs/>

CDBG Program Administration

Richard Culton	509.625.6009	rculton@spokanecity.org
Christy Jeffers	509.625.6029	cjeffers@spokanecity.org
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CHHS Board

Gordon Graves	1/1/2021 – 12/31/2023
Adriane Leithauser	04/18/2019 – Indefinite
Eric Robison	8/15/2022 – 8/14/2025
Blake Waltman	1/1/2023 – 12/31/2024
Bob Hutchinson	3/17/2020 – 3/16/2023
Jeri Rathbun	3/17/2020 – 3/16/2023
Barbara Lee	4/18/2022 – 4/17/2025
Karen Ssebanakitta	4/18/2022 – 4/17/2025
Leslie Hope	5/1/2023 – 5/1/2026
Casey Bowers	5/1/2023 – 5/1/2026
David Edwards	5/1/2023 – 5/1/2026
Georg Dahl	Indefinite
Karen Straton	2023
Betsy Wilkerson	2023

Overview of the CDBG Application Process

- Technical assistance can be obtained by contacting the CDBG Program Administrators listed on page 2. Contact staff directly via email or phone if you have questions regarding what is eligible, how to complete any part of the application, or how to comply with applicant requirements.
- SAM Registration is a pre-funding requirement. All applicants must have an active System for Award Management (SAM) status at the time of application. The online registration process to register in SAM is free and may be completed at <https://sam.gov/content/entity-registration>. *This is a required response in the application.*
- Application responses are character limited; please be concise with each answer.
- Applications will not be accepted by the application software if incomplete or beyond deadline.
- The application link for CDBG and all applicable documents is available <https://my.spokanecity.org/chhs/funding-opportunities/chhs/>

An application will not be recommended for funding under the following circumstances:

- It is determined to be ineligible for CDBG funding during the threshold review.
- It displaces lower-income households from their homes or place of business.
- It does not address an identified need and meet a goal in the 2020-2024 Consolidated Plan.
- It does not meet the HUD national objective of benefitting low- and moderate-income people.

Audit Requirements:

- Applicants must upload either their most recent audit report, including any “Management Letter” and/or all other correspondence referred to in the audit report, along with the applicant’s response to the audit and corrective action plan, if any.
- OR
- Applicants who have not been audited within the last two (2) years, must upload a certified “Current Financial Statement”.
 - ***This is a required upload prior to submission.***

Application Submittal:

- Applicants must be from eligible organizations listed in section ?
- Applications must be for eligible CDBG activities and projects as described in the RFP.
- Applications must be electronically signed by an Authorized Agency Official empowered to negotiate for and contractually bind the agency.
- Applicant Assurances must be downloaded from the application software, initialed, signed by the Authorized Agency Official, and uploaded.
- ***This is a required upload prior to submission.***

Additional Required Documents:

The following are required uploads prior to submission.

- Map of project location with census tract(s) and block group(s) clearly identified.

- List of current board/council members, with names and addresses.
- Applicant assurances, initialed and signed (download and upload from Submit page)
- Most recent audit report or financial statement
- Authorization to request funds; copy of minutes of the meeting in which the governing body's resolution, motion, or other official action is recorded to submit this application on its behalf.
- *Articles of incorporation/bylaws (not applicable for municipalities or special purpose districts).
- *Not-for-profit determination (not applicable for municipalities or special purpose districts)
- *Organizational chart (not applicable for municipalities or special purpose districts)

Important notes for application budgets:

- If CDBG funds are to be used for engineering costs, the total CDBG amount provided for design engineering and construction management may not exceed 15% of the proposed construction amount without prior approval from the City of Spokane. Engineering costs above this amount must be paid for with other funds.
- Applicants must consult with the City of Spokane prior to application if conditions exist which warrant engineering costs above this level.
- Additionally, the City of Spokane will not wholly support engineering costs for construction projects if other funds are used in the project. Engineering costs must be divided among available funding sources in a percentage equal to each fund source's participation in construction costs.

Community Development Program Overview

The City of Spokane receives an annual allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). For the 2024 Program Year, the City of Spokane estimates \$3,539,780 to be available for CDBG allocations. These funds will be allocated through a competitive Request for Proposal (RFP) process by the City of Spokane for eligible activities that meet both federal and city objectives.

****Estimated until Spring 2024 when HUD announces the CDBG entitlement amount.***

Services for homeless, although a high priority in the City of Spokane, are funded with other state, federal and local funds within the CHHS Department. Therefore, CDBG funds will not be utilized for homeless services. A public facility to house homeless individuals or families may be eligible for CDBG if other criteria are met in the threshold review.

The City of Spokane conducted a needs assessment to develop the Spokane 2020-2024 Consolidated Plan. The 2020-2024 Consolidated Plan is available at <https://my.spokanecity.org/chhs/documents/> Planning Documents.

Selected projects/activities will be conducted during each Program Year (PY), which begins July 1st, and ends June 30th, annually. However, activities may not begin or incur any costs until notified

by the City of Spokane to proceed. Environmental Reviews must be accomplished prior to start of work. The start date for your project/activity may be delayed and the time allowed to conduct your activity may be reduced.

National Community Development Block Grant Program Objectives

The primary objective of the federal CDBG Program, section 101 (c) of the authorizing statute, is **“the development of viable urban communities, by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low and moderate-income persons.”** This objective is achieved through one of three methods: **benefiting low- and moderate-income persons; preventing or eliminating slums and blight; and meeting urgent needs.** The statute also states that each grantee must ensure at least seventy percent (70%) of its expenditures over the particular period must be used to benefit low- and moderate-income persons. To be eligible for funding, every CDBG activity must qualify as meeting one of these three national objectives.

To meet the seventy percent (70%) program rule, the criteria for how an activity may be considered to benefit low- and moderate-income persons are divided into four subcategories:

- 1) Those based on area-wide benefit
 - 2) Those serving a limited clientele
 - 3) Those involving housing
 - 4) Those involving employment (jobs)
- 1) When the total amount of federal assistance for a project exceeds the threshold of \$200,000, Section 3 applies. Section 3 is applicable to projects involving housing rehabilitation, housing construction, and other public construction projects, assisted with HUD funds, or providing housing and community development financial assistance. Recordkeeping requirements for recipients are found at 24 CFR§ 75.31. Recipients are required to maintain documentation to demonstrate compliance with Section 3 regulations and are responsible for requiring their contractors/subcontractors to maintain or provide any documentation that will assist recipients in demonstrating compliance. More information can be found on the HUD frequently asked questions document at: [19580_SECTION3.PDF \(hud.gov\)](#)
 - 2) To qualify on an area-wide basis, an activity must meet the needs of low- and moderate-income persons residing in a service area where at least 51% of the residents are low- and moderate-income persons. *Verification of this limit is required at the time of application and again prior to funding.*
 - 3) An activity, which provides benefits to individuals and families, other than an area-wide benefit, may be eligible under limited clientele. To qualify under limited clientele, the activity must meet one of the following tests:
 - Be a presumed benefit clientele who are generally presumed by HUD to be principally low- and moderate- income persons. These categories of people include:
 - a) Abused Children

- b) Elderly Persons
 - c) Battered Spouses
 - d) Homeless Persons
 - e) Adults meeting Bureau of Census definition of Severely Disabled Persons
 - f) Illiterate Adults
 - g) Persons living with AIDS, and
 - h) Migrant Farm Workers
- Be targeted to an area but requires information on each client as to family size and income so that it is evident that at least fifty-one percent (51%) of the clientele are persons whose family income does not exceed the low- and moderate-income limit.
 - Be of such a nature and in such a location that it may reasonably be concluded that the activity's clientele will primarily be low- and moderate-income persons (e.g. a daycare center that is designed to serve low-income families).
 - Be an activity that serves to remove architectural barriers to the mobility or accessibility of elderly persons or of adults meeting the Bureau of the Census Current Population Report definition of "severely disabled", provided it is restricted to the extent practicable, to the removal of such barriers.
 - Reconstruction of a public facility or improvement, or portion thereof, that does not qualify under the low- and moderate-income area-wide benefit
 - Rehabilitation of a privately-owned nonresidential building or improvement that does not qualify under the low- and moderate-income area benefit or the low- and moderate-income jobs criteria
 - Rehabilitation of the common area of a residential structure that contains more than one dwelling unit and that does not qualify under low- and moderate-income housing criteria
- 4) A project/activity which assists in the acquisition, construction, or improvement of permanent, residential structures may qualify as benefiting low- and moderate-income persons only to the extent that the housing is occupied by low- and moderate-income persons. Project/activities must result in housing that will be occupied by low- and moderate-income households upon completion. The housing must be either owner or renter-occupied and can be either single family or multi-family units. Applicants planning to apply for these types of project/activities are encouraged to contact a CDBG Program Administrator for technical assistance.
- 5) A project/activity that provides funding for micro enterprises may provide economic development and meet the low- and moderate-income employment benefit national objective in one of the following three ways:
- Located in a predominantly low- and moderate-income neighborhood and serve the low- and moderate-income residents living there
 - Facilities are designed for use predominantly by low- and moderate-income persons

- Employment activities create or retain permanent jobs, the majority (at least 51%) of which are held on a full-time basis, by low- and moderate-income persons.

Please contact a CDBG Program Administrator prior to applying for employment programs or micro enterprise assistance for technical assistance. Threshold review will be conducted to ensure that these projects/activities are eligible.

HUD determines income limits annually.

HUD MEDIAN FAMILY INCOME (MFI) LIMITS 2023 (use for City HHAA, 1406/1590, HOME, and CDBG)															
(Effective 6/15/2023) Median Income for Spokane is \$89,000															
HH Size	100% MFI			80% MFI (Moderate Income)			60% MFI (Low Income)			50% MFI (Very Low Income)			30% MFI (Extremely Low Income)		
	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly
1	\$62,300	\$5,192	\$29.95	\$49,850	\$4,154	\$23.97	\$37,380	\$3,115	\$17.97	\$31,150	\$2,596	\$14.98	\$18,700	\$1,558	\$8.99
2	\$71,200	\$5,933	\$34.23	\$57,000	\$4,750	\$27.40	\$42,720	\$3,560	\$20.54	\$35,600	\$2,967	\$17.12	\$21,400	\$1,783	\$10.29
3	\$80,100	\$6,675	\$38.51	\$64,100	\$5,342	\$30.82	\$48,060	\$4,005	\$23.11	\$40,050	\$3,338	\$19.25	\$24,050	\$2,004	\$11.56
4	\$89,000	\$7,417	\$42.79	\$71,200	\$5,933	\$34.23	\$53,400	\$4,450	\$25.67	\$44,500	\$3,708	\$21.39	\$26,700	\$2,225	\$12.84
5	\$96,200	\$8,017	\$46.25	\$76,900	\$6,408	\$36.97	\$57,720	\$4,810	\$27.75	\$48,100	\$4,008	\$23.13	\$28,850	\$2,404	\$13.87
6	\$103,300	\$8,608	\$49.66	\$82,600	\$6,883	\$39.71	\$61,980	\$5,165	\$29.80	\$51,650	\$4,304	\$24.83	\$31,000	\$2,583	\$14.90
7	\$110,400	\$9,200	\$53.08	\$88,300	\$7,358	\$42.45	\$66,240	\$5,520	\$31.85	\$55,200	\$4,600	\$26.54	\$33,150	\$2,763	\$15.94
8	\$117,500	\$9,792	\$56.49	\$94,000	\$7,833	\$45.19	\$70,500	\$5,875	\$33.89	\$58,750	\$4,896	\$28.25	\$35,250	\$2,938	\$16.95

CDBG Priority Needs and Goals

Priority Community Development Needs - The needs listed in this section are housing and non-housing community development needs identified in the 2020-2024 Consolidated Plan. They reflect the results of the citizen participation process and the required consultation with local government and other required consultations with agencies and organizations.

The City of Spokane’s 2020-2024 Consolidated Plan is a five-year strategic plan, carried out during project years (PY) through Annual Action Plans. The Consolidated Plan’s Goals are:

- Housing Stability,
- Community Based Social Services,
- Public Health and Safety.

Amendments to the Consolidated Plan’s goals may be requested. *A copy of the amendment process is included as Exhibit A of this document.*

The focus of the CDBG Program is to fund activities and projects that serve low- and moderate-income residents of the City of Spokane. CDBG activities and projects must meet threshold requirements, conform with HUD national objectives and the Consolidated Plan’s purpose and intent by addressing community development needs.

CDBG ELIGIBLE ACTIVITY TYPES
Affordable Housing Activity Types:
<ul style="list-style-type: none"> ○ Housing counseling ○ Minor Home Repair ○ Single Family Rehabilitation
Non-Housing Community Development Activity Types:
<ul style="list-style-type: none"> ● Public Facilities: <ul style="list-style-type: none"> ○ Community Center Capital Improvements ○ Childcare facilities or improvements ○ Broadband and Internet facilities ○ Other Public Facility improvements ● Public Services: <ul style="list-style-type: none"> ○ Emergency Services; may include clothing, utility, prescription, transportation, direct client services, food banks and food security programs ○ Community Center Operations support ○ Senior Services ○ Services for disabled ○ Youth Services ○ Health Services ○ Services for victims of domestic violence ○ Services for battered and abused
Economic Development Activity Types
<ul style="list-style-type: none"> ● Micro Enterprise assistance ● Workforce Development

Anticipated Community Development Block Grant Funds Available

For the 2024 Program Year (PY), The City of Spokane anticipates receiving and allocating the following amounts:

Estimated CDBG Program Revenues:

CDBG Entitlement Amount	\$3,126,340 **
Other Program Income	<u>413,440</u>
Total New Funds Available	\$3,539,780
 Total Funds Available	 \$3,539,780 *

Statutory Limits on Certain Activities:

Maximum Administration and Planning Allocation **Total Available: \$0 to \$707,956**
(20% of Total New Funds Available)

Maximum Public Service Allocation **Total Available: \$0 to \$530,967**
(15% of two year's program income Entitlement Funds)

***NOTE:** The US Congress may alter the appropriation amount for the CDBG. If CDBG funding is reduced nationally, entitlement communities (including the City of Spokane) will receive fewer dollars than anticipated. Congress may act at any time in regard to the national CDBG budget. The level of funding available is never certain until an entitlement community receives official notice from HUD. If funding is reduced after the selection and allocation process, the amount originally recommended for funding will be automatically reduced in a manner determined by the CHHS Board.*

Tentative Timeline for the 2024 CDBG Program Year *dates are estimated.

Month	Date	Activity
July	7.5.2023	CHHS Board opens public comment period for 2024 PY CDBG Citizen Participation Plan, Policies and Procedures, and Request for Proposals
July	7.16.2023	Public notice in Spokesman Review
July	7.17.2023	Public comment period opens
July	7.31.2023	Public comment period ends
August	8.2.2023	Public Hearing before the CHHS Board
August	8.16.2023	Applicant Workshop / Applications made available
September	9.15.2023	Application due date for the 2024 CDBG Program Year
November	11.1.2023	CHHS Board reviews applications and provides scoring
March	3.6.2024	CHHS Board opens public comment on 2024 Annual Action Plan with recommended projects/activities
April	4.1.2024	Public notice in Spokesman Review (when CDBG allocation is published by HUD) Begin date of public comment 4.1.2024
April	4.30.2024	Close of public comment period on 2024 Annual Action Plan
May	5.1.2024	Public Hearing before the CHHS Board

Please refer to the Citizen Participation Plan for required comment periods on the CDBG Program and information on the participation process.

***Dates are subject to change. Please check <https://my.spokanecity.org/chhs/funding-opportunities/chhs/> for changes or contact the City of Spokane**

**** Open public meetings:** *Anyone may attend. Comments are welcome from visitors regarding any issue in which the CHHS Department is involved which may or may not appear on the agenda for the public meeting.*

*****Public hearings:** *CHHS Board Public meetings may also include Public Hearings with proper notice. Anyone may attend and public comments are welcome.*

Activity Selection Process

CDBG 2024 PY will continue to support agencies who assist low- and moderate- income City residents and provide information to these agencies on methods to connect with CDBG funds to assist their clients.

Housing and Community Development (HCD) staff conducts a review to determine if the proposal may be submitted to the CHHS Board for consideration. This review determines if the proposed activity and/or applicant meets all application and HUD requirements.

Eligible applications are reviewed by CHHS to determine funding recommendations at an open public meeting. The CHHS Board provides preliminary recommendations on which activities to fund and funding amounts. The Annual Action Plan (AAP) and the recommended activities within the Plan will be open to public comment according to the schedule listed in the Citizen Participation Plan. The Citizen Participation Plan can be found at: <https://my.spokanecity.org/chhs/documents/>

The Spokane City Council considers the CHHS Board's recommendations for funding and public comments obtained during the comment period to make the final decision regarding selection of activities and allocation of funds.

Upon approval by the City Council, the CHHS Department submits the 2024 Annual Action Plan (AAP), including projects to be funded, to the US Department of Housing and Urban Development (HUD). HUD reviews the AAP and accepts additional public comment for 45 days prior to the beginning of the Program Year. Upon HUD's acceptance of the AAP and the City's receipt of a contract from HUD, and completed environmental reviews, subrecipients will be notified that they may begin to implement a project.

Eligible Applicants

- Not-for-profit organizations.

Organizations serving black, indigenous, people of color (BIPOC) and/or limited English speakers are highly encouraged to apply.

Ineligible Activities

The following is a list of some examples of ineligible projects. Other activities may be determined to be ineligible or disallowed based upon other regulatory or statutory factors. HCD will review all proposals for ineligible and/or disallowed costs.

- Improvement or construction of city halls, county courthouses, and other buildings used predominantly for the general conduct of government, except for the removal of architectural barriers to make the structure accessible to persons with disabilities.
- Payment of general government expenses, including operation and maintenance of public facilities.
- Financing of political activities.
- Financing of religious activities.
- Purchase of equipment or furnishings unless required to implement an eligible activity. *Approval of the U.S. Department of Housing and Urban Development is required.*
- Income payments to individuals.
- New construction of housing. **NOTE:** Certain types of "housing" (even newly constructed) which meet federal eligibility criteria for public facilities may not be prohibited.
- Land Banks are ineligible for CDBG funds.

Low, Very Low, or Extremely Low-Income Benefit

Proposals will only be accepted for projects or activities that will principally benefit lower income persons, as defined by the U.S. Department of Housing and Urban Development (HUD). The principal benefit criteria must be met by proposing a project which:

- **Area-wide benefit category:** Benefits all residents of a defined geographic area such as a neighborhood, block group, or district, in which **51%** or more of the residents have a household income at or below eighty percent (80%) of the most current Spokane Area Median Family Income. *Area-wide benefit may be used for infrastructure and public facility activities only.*
- **Presumed benefit category:** Benefits a group of individuals of which fifty-one percent (51%) are low-income, based on client records or other information available about incomes of specific clients served. *Examples are confidential services to victims.*
- **Direct Client Services category:** Directly benefits individuals from whom income information is collected on an individual household basis to document that they are low-income. *This includes payments made on behalf of qualified beneficiaries.*
- **Slum and blight and urgent need categories:** Federal program guidelines also permit funding of activities, which prevent or eliminate slums or blight, or alleviate an urgent community development need. Proposals may be submitted which meet the criteria for these types of activities; however, the activity must also principally benefit lower-income persons. Activities must meet all Program rules and be approved by the City of Spokane.

Instructions for Completing the Electronic Application

- Go to <https://my.spokanecity.org/chhs/funding-opportunities/chhs/>
- Click link to Application Software (available August 16, 2023)
- Complete Application through software
- Upload all required documents (software will not accept incomplete applications)
- Click Submit

For assistance with navigation of the Application Software and to understand specific program requirements, attendance of the annual Applicant Workshop it is highly recommended. Please contact cjeffers@spokanecity.org to be added to the RFP email list.

Virtual CDBG Applicant Workshop

August 16, 2023

1:00 p.m. – 2:30 p.m.

Please contact Christy Jeffers if you would like an invitation sent to your email, are unable to attend and/or need Technical Assistance, at cjeffers@spokanecity.org 509.625.6056.

EXHIBIT A

Consolidated Plan Amendment Process

All proposed amendments to the Consolidated Plan will be handled in accordance to procedures outlined below:

Time-Period and Notice

Requests for amendments may be submitted to the CHHS Department at any time during the year. To be considered in the annual amendment process, submittals must be received no later than the end of February of each year. Submittals that are received after the end of February will be considered in the amendment process for the following Program Year.

The CHHS Department will publish notice in the official newspaper to inform the public of the opportunity to submit requests for amendments to the Consolidated Plan as part of the annual update to the Citizen Participation Plan. All suggestions and requests will be considered at advertised Public Hearings or meetings before the CHHS Board, in accordance with federal law and city requirements. Notice of public hearings or meetings will be provided to the public as defined in the CHHS CDBG Citizen Participation Plan.

Review and Decision Procedures

City of Spokane Review and Recommendations

Each year, around March, CHHS will evaluate all the requests for amendments and will prepare recommendations for the CHHS Board at its March meeting. The City's review and recommendation will consider the problem to be resolved, applicable federal laws and regulations, and, where applicable, alternative solutions.

CHHS Board Consideration and Recommendations

The CHHS Board will consider the requests for amendments to the consolidated plan, along with staff recommendations, in a Public Hearing. The CHHS Board's recommendations are presented to the City Council following the Public Hearing.

City Council Consideration and Decision

The Spokane City Council will consider the requests for amendments, and the recommendations of the CHHS Board and CHHS, and will determine 1) which proposals to approve for amendment, 2) which proposals to refer to CHHS for further staff work, and 3) which proposals will not be approved. The City Council may, at its option, consider the CHHS Board's recommendation in a public meeting or hearing held in accordance with the requirements of the Consolidated Plan.

Other Reviews and Notice

All Consolidated Plan amendments are subject to public notice, a 30-day comment period, and may require an Environmental Review. The City of Spokane will also formally notify the U.S. Department of Housing and Urban Development (HUD) of adopted substantial amendments to the Consolidated Plan or previous years' Annual Action Plans as required and in the next published CAPER.

Final action is reserved for the Spokane City Council. The Council's decision shall become effective by City Council action.

Required Information for Amendment Proposals:

1. Name, address, and phone number of the person(s) or other interested party(ies) who is(are) submitting the request(s) for amendment(s) to the Consolidated Plan.
2. Description of the proposed amendment:
 - Describe your proposal for amending the Plan;
 - Provide suggested new language or new wording that would meet your concerns; and
 - Provide a reference to the particular section or sections of the Consolidated Plan.
3. Describe how the amendment will further the Principles of Consolidated Plan as defined below.
 - Priority to Lowest-Income: Ensure the needs of people with the lowest income are given priority consideration.
 - Basic Support: Encourage the focus of public service resources on essential basic needs.
 - Citizen Participation: Provide opportunities for all public to participate in plan development, implementation and evaluation.
 - Collaboration - Encourage public, private, and non-profit sectors collaboration and reduce program duplication.
 - Emphasize the Potential: Build upon available community assets, resources, plans and market forces.
 - Leverage: Leverage limited resources by promoting partnership between organizations.
 - Measurable Results: Produce and evaluate measurable outcomes and results.
 - Comprehensive: Engage comprehensive strategies to address the holistic needs of a neighborhood, household or individual.
4. Fully explain the reasons why the change should be made, what quantifiable information was used to reach the conclusion, what type of citizen participation was used to determine a change was necessary. In addition, describe how the proposed change will:
 - Correct an incorrect or an obvious omission;

- Correct an inconsistency or improve consistency within the documents; or
 - Address an issue or priority that is not satisfactorily addressed by the Consolidated Plan, or that the Consolidated Plan is silent on.
5. Signature(s) of the person(s) who is(are) submitting the proposal for amendment. If an agent is submitting the proposal, the agent must demonstrate that they are authorized to submit this application on behalf of the person or organization.

For additional information

If you have questions or need assistance, please contact Christy Jeffers at the CHHS. Phone: (509) 625-6056 or cjeffers@spokanecity.org