# **Executive Summary**

### AP-05 Executive Summary - 91.200(c), 91.220(b)

#### 1. Introduction

The City of Portland is the lead agent for the Consolidated Plan Consortium, which also includes the City of Gresham and Multnomah County. In accordance with HUD regulations, the Consolidated Plan Consortium is required to submit a Consolidated Plan every five years as a condition of receiving four Federal formula grants: Community Development Block Grant, HOME Investment Partnership Grant, Emergency Solution Grant and Housing Opportunities for Persons with AIDS. The Consolidated Plan contains a snapshot of the community's housing and community development needs, identifies local priorities, and establishes the strategies each jurisdiction will use to address those priority needs. The Consolidated Plan also includes five-year numeric goals; each jurisdiction will be expected to measure its progress against those goals in the Consolidated Annual Performance Report filed in the fall. The 2016-2020 Consolidated Plan will be the fifth, five-year plan. Consortium members also submit an annual Action Plan; Action Plan FY 2017-2018 will be submitted this year along with any updates to the Five-Year 2016-2020 Consolidated Plan.

HUD regulations also require each Consortium receiving federal housing and community development funds to certify that it is affirmatively furthering fair housing. To ensure that the members of the Consortium are aware of the current level of bias and discrimination in the local housing market, the Consortium is required to submit an Assessment of Fair Housing (AFH) in 2020. Because of major changes in the housing market since 2011, the Portland Consortium will update the 2011 Analysis of Impediments to Fair Housing Choice (AI), within the first year of the 2016-2020 Consolidated Plan. The current 2011 AI describes the barriers to fair housing choice, which remain today, and includes recommendations for actions to address and eliminate them. Most of these recommendations are funded in the FY 2017-2018 Action Plan.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

- CDBG Program Objectives: Provide decent housing; Create suitable living environments; Expand economic opportunity
- HOME Program Objectives; Expand the supply of decent, safe, sanitary and affordable housing.
- ESG Program Objective: Reduce and prevent homelessness.
- HOPWA Program Objective: Provide housing for persons with HIV/AIDS.

### Summary of the objectives and outcomes identified in the Consolidated Plan

As determined in the Needs Assessment and Market Analysis included in this plan, the three broad needs and goals identified are described below:

### Affordable housing choice (Need); Increase and preserve affordable housing choice (Goal)

Affordable housing choice, includes safe housing, in good condition for all residents. Projects accomplishing this goal include home repair, down payment assistance, new housing development support, affordable housing development, rental housing rehabilitation and permanent supportive housing.

2017-2018 Goals: Direct financial assistance to homebuyers - 8; Housing units rehabilitated - 44

# Basic services & homeless prevention/intervention (Need); Reduce homelessness and increase stability (Goal)

This goal includes preventing and reducing homelessness and increasing stability for all residents. Projects accomplishing this goal include interventions across a broad spectrum, such as: supportive and emergency services, transitional housing, shelters, homelessness prevention through service interventions, Housing First models, Fair Housing enforcement and education, cultural and population appropriate program delivery and activities to increase self-sufficiency, e.g., job training, employment readiness and education.

2017-2018 Goals: Public Services other than low-mod housing- 5,233; Other homeless prevention - 182

### Community and economic development (Need); Infrastructure, facilities, economic opportunity (Goal)

This goal includes improving infrastructure, facilities, economic opportunities and economic development. Programs to improve employment outcomes and household economic stability include employment training. Projects accomplishing this goal include extensive work with infrastructure, which is seen in Portland, Gresham and Multnomah County as essential in encouraging stability in neighborhoods, increasing access to persons with disabilities and attracting and retaining businesses. Projects will also support micro-enterprises and business development, as well as, public facilities, parks

and transportation improvements.

2017-2018 Goals: Improve infrustructure 1,260 persons, Microenterprise assistance - 112 business

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Gresham has been successful in achieving, and for some projects, exceeding its goals that were set in the 2016-2017 Annual Action Plan.

In achieving its CDBG and HOME goals, the City of Gresham is making an impact on identified needs in the City. The programs and projects continue to be on-track and on-schedule, resulting in timely disbursements of CDBG and HOME funds.

Gresham also re-evaluates the needs of low-income households and the services provided to them through participation in activities with other jurisdictions and agencies to coordinate these efforts. Gresham, Multnomah County, and Portland continue to work closely in soliciting applications for CDBG and HOME funds and implementation of projects. Gresham participates with METRO to address the on-going need for affordable housing in the region.

### 4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. A preliminary draft was made available October 10, 2016 via an announcement in the Daily Journal of Commerce, Gresham Outlook and via the Consortium websites. A second draft was made available March 27th, 2017 and the public hearings regarding goals, objectives and strategies were held April 8th for Multnomah County, April 5th for the City of Gresham and June 6th for the City of Portland. The Portland City Council reviewed the Action Plan projects June 21st. Gresham City Council reviewed their second year Action Plan July 18th and Multnomah County Commissioners reviewed their second-year Multnomah County Action Plan July 20th. The Action Plans are also informed by the initial

Five-Year Consolidated Plan planning meetings that included three Fair Housing information meetings, and over ten focus groups with specific cultural, language and geographic communities.

Approximately 150 people participated in the Consolidated Plan Need Hearings, 165 in the focus groups and 100 people in the spring Consolidated Plan Action Plan meetings. The hearings and meetings were designed to reach a diverse range of people in terms of race, ethnicity, language, geography, income and culture. We met with low-income renters at their buildings, six linguistically specific groups were organized and several culturally specific groups met. Citizen participation was also encouraged through door knocking, four public meetings about barriers to Fair Housing, and a regional survey to a panel of over twenty thousand people. The focus groups included African Americans, Asian/Pacific Islanders, Hispanics and recent immigrant and refugee groups from Russia, Nepal, Burma, and Somalia. For the Need Hearings special attention was given to making the hearing accessible and known by non-English speaking citizens.

The City provided meeting and hearing notices, notice of the draft plans as required by the adopted Community Participation Plan, through a broad range of channels including newspapers and emails to interested parties. Draft plans were made available online and paper version was available at City Hall. Notices were also posted on PHB's website, and printed in the DJC, and the Gresham Outlook, Asian Pages, Latino De Hoy and The Skanner.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for this Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

### 5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City of Gresham and Multnomah County conducted joint Community Need Hearings in November 2016. The first hearing conducted on November 2nd was designed to reach community members whose primary language was Spanish. The second hearing conducted on November 10th was directed to all residents of Gresham and East County as a whole. Comments about Community Need for the Spanish language group were varied. The majority of comments were focused in two areas – affordable housing and employment. The group described the need for habitability, affordability and tenant rights. Comments on employment were about the need to provide ESL classes and job skills training opportunities, so that members of the Latino community can access higher wage employment. The comments received from the attendees on November 10th also focused on rental housing challenges and skill development for living wage employment. Transportation challenges in Gresham and East

County were highlighted because many felt public transportation was inadequate for the growing population in the area.

Comment cards completed by participants at the November 2016 hearings reflected the verbal comments described above and highlighted concerns for infrastructure improvements that support community safety – sidewalks, street lighting, etc. The groups also emphasized the need for economic development that supported small business.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for this Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

Staff also consulted local reports describing community and economic needs.

### 6. Summary of comments or views not accepted and the reasons for not accepting them

No comments were not accepted.

### 7. Summary

## PR-05 Lead & Responsible Agencies - 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency	
CDBG Administrator	GRESHAM	Community Revitalization	

Table 1 – Responsible Agencies

### **Narrative**

The City of Portland is the lead agency in the HOME Consortium. The Portland Housing Bureau (PHB) administers the HOME funds and as such is designated as the lead agency for the Plan. Staff for the HOME Consortium meets periodically for coordination of planning. Staff seeks guidance from their respective housing investment committees.

#### **Consolidated Plan Public Contact Information**

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## AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

#### 1. Introduction

This section outlines consultations with public and private agencies that provide housing, social and economic development services through State and local health and child welfare agencies, adjacent governments, HOPWA grantees, the public housing agency, Continuum of Care grantees, Emergency Solution Grant grantees, and public and private agencies concerning housing, and related social programs for homeless, victims of violence, unemployed and publicly funded institutions and systems of care that may discharge persons into homelessness, such as health-care facilities, mental health facilities, foster care, and corrections programs. The Portland Consortium includes representatives from the City of Portland, the City of Gresham and Multnomah County. They participate in regional planning efforts concerning all aspect of needs and opportunities covered by this Consolidated Plan, including economic development, transportation, public services, special needs, homelessness, and housing. Needs far exceed resources so the Consortium members have worked together to make decisions and set long-term priorities. Coordination within the Cities also consisted of input and review from the Portland Housing Advisory Commission, the Fair Housing Advocacy Committee, the Federal Funding Oversight Committee, the City of Gresham Community Development and Housing Subcommittee and the Multnomah County Policy Advisory Board. Coordination with Home Forward and Housing, serviceproviding agencies, and other stakeholders are described below. Their comments and input are reflected in discussions throughout this Consolidated Plan.

Gresham's 30-day comment period for the 17-18 Annual Action plan was from April 12-May 12. Notice was published in The Outlook on ???? and the DJC 4/14/17. The City also posted on the City's web-page 4/7/17. The City also posted updated date nformation about the Council meeting to approve the Action Plan July 5, 2017. This notice indicated that the City would take additional public comments until July 19th.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

Representatives of the Consortium of the City of Portland, City of Gresham and Multnomah County participate in regional planning efforts concerning all aspects of needs and opportunities covered by this Consolidated Plan, including housing, public services, homelessness, special needs, economic development and transportation. Significant resources are jointly planned and administered for homelessness prevention, emergency housing and supportive services. Coordination efforts and planning processes are reflected in discussions throughout this Consolidated Plan. In preparing the Consolidated Plan, the Consortium has consulted with other public and private agencies that provide

assisted housing, health services and social services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families and homeless persons).

These consultations have occurred in the course of regularly-occurring meetings of the Portland Housing Advisory Commission, A Home for Everyone coordinating board, the Fair Housing Advocacy Committee, Healthy Homes Coalition, Oregon Opportunity Network in special meetings and hearings sponsored by the City of Portland, the City of Gresham and Multnomah County and in specially noticed Consolidated Plan hearings. Consultation occurred with both housing and service providers; Home Forward (formerly Housing Authority of Portland); homeless persons; people with disabilities; and organizations that provide services to homeless families, people with alcohol or drug addictions, people with developmental disabilities, HIV affected families, the elderly, homeless adults, children and families and people with mental illness. Many provided additional testimony at the public hearings. (Please see Appendix A.)

The Consortium consulted with state and local health agencies regarding lead paint issues. Child welfare agencies do not have a role in lead hazard identification or abatement in Multnomah County. For this plan the Consortium met specifically, or within the course of everyday business, with each of the required public and private agencies.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

All three of our Consolidated Plan jurisdictions (Portland, Multnomah County, and Gresham) are represented on the Continuum of Care (CoC) Board (meets monthly) and its Executive Committee (meets quarterly.) The CoC coordinates with Consolidated Plan jurisdictions through meetings, calls and emails, to organize needs and Action Plan hearings and subcommittee to work on strategic planning, outreach, evaluation and system coordination. All of the jurisdictions support the Continuum's priorities focusing on the needs of the most vulnerable populations including chronically homeless persons, unaccompanied youth, families with children, and veterans, among others. The CoC is part of a coordinated effort called "A Home for Everyone." The A Home for Everyone Plan calls for assessment and rapid placement in appropriate housing, reducing vulnerability and increasing stability.

CoC goals from Consortium local homelessness plan align with our Consolidated Plan. Under the 2016-2020 Consolidated Plan, this primarily comes through coordination between the CoC needs assessments Annual Action Plan 8 and strategic plan and the Consolidated Plan priority need #2 (Need for basic services and homelessness prevention and intervention) and goal #2 (Reduce homelessness and increase stability), though each of the Consolidated Plan priority needs and goals also aligns with CoC effort (especially those related to affordable housing production and preservation and economic opportunity). The CoC works with all three jurisdictions to engage consumers, neighborhoods and public agencies providing housing, health and social services (including health care agencies and the public housing authority.) The CoC specifically looks at the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness. The CoC is working on a single point of entry system, it has been successful at addressing veteran homelessness, and the CoC is using its experience to address other special need homeless populations.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The Portland Consortium work closely with the Collaborative Applicant of the Continuum of Care (planning for allocation and use of Emergency Solutions Grant (ESG) funds). ESG policies and procedures were created and are updated periodically in cooperation with the Consortium. Guidelines ensure that ESG subrecipients are operating programs consistently across eligible activities. Performance is reviewed by all three entities. The Collaborative Applicant (City of Portland) is also the HMIS lead and works closely with Multnomah County to maximize use of HMIS resources and to draw data for reports on project performance and program outcomes.

The CoC actively solicits and integrates ESG recipient participation in planning, evaluation & reporting. The Portland Housing Bureau (PHB) staffs the CoC Board and is also an ESG grantee and lead agency for the CoC and Portland Consolidated Plan. The CoC gathers input from ESG recipients through subcommittees, including the data & evaluation subcommittee, to assess needs and guide ESG funding decisions to more effectively end homelessness. Our CoC currently directs ESG to expand capacity of the regional Short Term Rent Assistance program and operate emergency shelter closely aligned with locally- and CoC-funded housing resources. PHB monitors ESG recipients and evaluates project performance using CoC-developed housing placement outcomes collected in the regional homeless management information system (HMIS). Data is analyzed from project-level outcomes, system-wide point-in-time counts of homelessness and HMIS reports and ESG recipient feedback, and ESG-specific policies and procedures are included in the CoC's adopted HMIS policies and procedures. The CoC's data & evaluation subcommittee evaluates outcomes to provide direction for project- and system-level performance improvements.

The responsibility for implementing the Plan will rest with the Portland Housing Bureau, Gresham's Community Development Department, Multnomah County Department of Human Services and Home Forward. However, implementation cannot proceed without the involvement and support of several public and private agencies. The following list describes the various institutions, businesses and agencies responsible for the delivery of housing and economic opportunity services in the region. Each description of a product and market segment is not intended to be a complete account of activities for each entity.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	MULTNOMAH COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	2016 was the first year of the jointly funded Joint Office of Homeless Services.
2	Agency/Group/Organization	HUMAN SOLUTIONS, INC./WILLOW TREE
	Agency/Group/Organization Type	Services-homeless Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Human Solutions - Willow Tree was consulted as a subrecipient through meetings and notices.
3	Agency/Group/Organization	HUMAN SOLUTIONS, INC
	Agency/Group/Organization Type	Housing Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Human Solutions was consulted as a subrecipient through meetings and notices.

4	Agency/Group/Organization	East County Solutions
	Agency/Group/Organization Type	Services-Education Services-Employment Grantee Department
	What section of the Plan was addressed by Consultation?	Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	East County Solutions was consulted as a subrecipient through meetings and notices.
5	Agency/Group/Organization	Metropolitan Family Services
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	MFS was consulted as a subrecipient through meetings and notices.
6	Agency/Group/Organization	Catholic Charities-El Programa Hispano
	Agency/Group/Organization Type	Services-Education Services-Employment Services - Victims Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	El Programa Hispano was consulted as a subrecipient through meetings and notices.

7	Agency/Group/Organization	JOIN
	Agency/Group/Organization Type	Housing
		Grantee Department
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless
		Homeless Needs - Families with children
		Homelessness Needs - Veterans
		Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the	JOIN was consulted as a subrecipient through
	anticipated outcomes of the consultation or areas for improved coordination?	meetings and notices.
8	Agency/Group/Organization	Community Energy Project, Inc
	Agency/Group/Organization Type	Housing
		Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the	Community Energy Project, Inc. was consulted as
	anticipated outcomes of the consultation or areas for improved coordination?	a subrecipient through meetings and notices.
9	Agency/Group/Organization	Unlimited Choices
	Agency/Group/Organization Type	Housing
		Grantee Department
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the	Unlimited Choices was consulted as a
	anticipated outcomes of the consultation or areas for improved coordination?	subrecipient through meetings and notices.
10	Agency/Group/Organization	PORTLAND HOUSING CENTER
	Agency/Group/Organization Type	Housing
		Grantee Department

What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	PHC was consulted as a contractor for Gresham's down payment assistance program.

Identify any Agency Types not consulted and provide rationale for not consulting

## Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Multnomah County	This collaboration aligns with the Strategic Plan goal of aligning homeless services.

Table 3 - Other local / regional / federal planning efforts

### **Narrative**

## AP-12 Participation - 91.401, 91.105, 91.200(c)

# 1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Consortia follows the federally required Community Participation Plan. This robust public participation strategy included several public hearings in advance of formal consideration and adoption by the jurisdictions. A preliminary draft was made available October 10, 2016 via an announcement in the Daily Journal of Commerce, Gresham Outlook and via the Consortium websites. A second draft was made available March 27th, 2017 and the public hearings regarding goals, objectives and strategies were held April 8th for Multnomah County, April 5th for the City of Gresham and June 6th for the City of Portland. The Portland City Council reviewed the Action Plan projects June 21st. Gresham City Council reviewed their second year Action Plan July 18th and Multnomah County Commissioners reviewed their second-year Multnomah County Action Plan August 3, 2017. Community members were in attendance at each meeting. The Action Plans are also informed by the initial Five-Year Consolidated Plan planning meetings that included three Fair Housing information meetings, and over ten focus groups with specific cultural, language and geographic communities.

The City of Gresham and Multnomah County conducted joint Community Need Hearings in November 2016. The first hearing conducted on November 2nd was designed to reach community members whose primary language was Spanish. The second hearing conducted on November 10th was directed to all residents of Gresham and East County as a whole. Comments about Community Need for the Spanish language group were varied. The majority of comments were focused in two areas – affordable housing and employment. The group described the need for habitability, affordability and tenant rights. Comments on employment were about the need to provide ESL classes and job skills training opportunities, so that members of the Latino community can access higher wage employment. The comments received from the attendees on November 10th also focused on rental housing challenges and skill development for living wage employment. Transportation challenges in Gresham and East County were highlighted because many felt public transportation was inadequate for the growing population in the area.

Comment cards completed by participants at the November 2016 hearings reflected the verbal comments described above and highlighted concerns for infrastructure improvements that support community safety – sidewalks, street lighting, etc. The groups also emphasized the need for economic development that supported small business. See attached 16-17 Combined Needs Assessment Comments document.

The public involvement process is contained in the Citizen Participation Plan (CPP). The CPP is was adopted in the 2016-2020 Consolidated Plan. The public participation process for this Consolidated Plan follows the CPP guidelines. The current CPP is an exhibit of the current five-year Consolidated Plan and will guide the future public participation processes.

Staff also consulted local reports describing community and economic needs.

### **Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of	Summary of	Summary of comments	URL (If
			response/attendance	comments received	not accepted	applicable)
					and reasons	
				Although		
				comments were		
			There were	varied, most		
		Non-English	approximately 20	attendees cited the		
				lack of affordable		
1	Public Meeting	Speaking - Specify	attendees for the joint	housing as the	No comments were not	
1	Fublic Meeting	other language:	Gresham/Multnomah	primary issue.	accepted.	
		Spanish	County needs	Additionally, there		
			,	was much		
			assessment meeting.	discussion about		
				the need for jobs		
				and job training.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	Non- targeted/broad community	The Gresham Action Plan hearing was held April 27the with the CDHS. There were no other community members that attended.	N/A	N/A	
3	Public Hearing	Non- targeted/broad community	City of Gresham City Council Meeting to approve the 17-18 Annual Action Plan. July 18th.	Only one comment, written, was received. It was related to down payment assistance programs.	There were no comments not accepted.	

Table 4 – Citizen Participation Outreach

# **Expected Resources**

# AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

### Introduction

## **Anticipated Resources**

Program Source of		Uses of Funds	Ехре	cted Amour	nt Available Ye	ar 1	Expected	Narrative Description
	Funds		Annual Program Prior Year Total: Amount		Amount			
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan \$	
CDBG	public -	Acquisition					<b>,</b>	The City does not anticipate
	federal	Admin and						program income from CDBG.
		Planning						
		Economic						
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	940,979	59,859	42,838	1,043,676	2,214,057	
Section	public -	Acquisition						
108	federal	Economic						
		Development						
		Housing						
		Public						
		Improvements	650,000	0	0	650,000	0	

Program	Source of	Uses of Funds	Ехре	ected Amour	nt Available Ye	ar 1	Expected	Narrative Description	
	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$		
Other	public - local	Public Improvements						Returning funds to the line of credit due to non-compliance with	
			200,000	0	0	200,000	200,000	70% low-mod income	

**Table 5 - Expected Resources - Priority Table** 

# Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Gresham alone, and as part of the HOME Consortium with the City of Portland and Multnomah County, makes every effort to leverage HUD grant funds with other public and private investments. Housing development and rehabilitation activities are highly leveraged because public funds are used as "last in" gap financing amounts, which requires that more substantial investments are in place. In the 2016-2017 fiscal year, Gresham leveraged almost four times the amount of CDBG-expended funding from other sources – other federal, state/local, private and in-kind. The Portland Housing Bureau as the Consortium lead makes required matches for use of HOME funds.

In the months and years ahead, communitywide efforts will continue to move forward to find increased opportunities to leverage and better align economic opportunities and resources to support housing stability and reduction in homelessness.

# If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Gresham does not anticipate the use of publicly-owned land or property in projects currently planned or underway. If those

opportunities arise, however, such land and property will be included to the extent practicable.

Discussion

# **Annual Goals and Objectives**

# AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

# **Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase &	2016	2020	Affordable	Alea	Affordable housing choice	CDBG: \$291,277	Public service activities
	preserve			Housing				other than Low/Moderate
	affordable			Public Housing				Income Housing Benefit:
	housing choice			Homeless				25 Persons Assisted
								Rental units rehabilitated:
								25 Household Housing
								Unit
								Homeowner Housing
								Rehabilitated: 18
								Household Housing Unit
2	Reduce	2016	2021	Homeless		Basic services & homeless	CDBG: \$457,810	Public service activities
	homelessness &			Non-Homeless		prevention/intervention		other than Low/Moderate
	increase stability			Special Needs				Income Housing Benefit:
								5216 Persons Assisted
								Tenant-based rental
								assistance / Rapid
								Rehousing: 75 Households
								Assisted
								Homelessness Prevention:
								77 Persons Assisted

Sort	Goal Name	Start	End	Category	Geographic	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year		Area			
3	Infrastructure,	2016	2020	Non-Housing		Community & economic	CDBG: \$356,589	Public Facility or
	facilities &			Community		development	Section 108:	Infrastructure Activities
	economic			Development			\$650,000	other than Low/Moderate
	opportunity						Transportation:	Income Housing Benefit:
							\$200,000	1260 Persons Assisted
								Businesses assisted: 112
								Businesses Assisted

Table 6 – Goals Summary

# **Goal Descriptions**

1	Goal Name	Increase & preserve affordable housing choice	
	Goal	Funding allocated includes \$63,389 in Program Administration.	
	Description		
2	Goal Name	Reduce homelessness & increase stability	
	Goal	Funding allocated includes \$63,389 in Program Administration.	
	Description		
3	Goal Name	Infrastructure, facilities & economic opportunity	
	Goal	Funding allocated includes \$63,389 in Program Administration. It also includes \$265,000 for Section 108 Loan payments	
	Description	and pre-payments. This does not increase the number of people served, as these projects were complete and closed in previous years.	

### AP-35 Projects - 91.420, 91.220(d)

#### Introduction

The 2017 Annual Action Plan outlines projects meeting needs identified in the 2016-2020 Consortium Consolidated Plan, opportunities in Gresham and City priorities. Initial project recommendations were made in consultation with the Community Development and Housing Subcommittee which reviewed and evaluated applications. Part of the review process was consideration of the ability of local and regional agencies and partners to successfully achieve objectives and administrative demands, including monitoring. The City Council made the final decisions on projects.

#	Project Name	
10	Children's Fountain Principal & Interest Payment	
12	Children's Fountain Prepayment	
16	Family of Friends Mentoring	
17	Sunrise Kitchen Center Entrepreneur Support	
18	Program Administration	
19	El Programa Hispano Catolico	
20	Living Solutions	
21	Rent Assistance Admin- Human Solutions	
22	Willow Tree Transitional Housing	
23	AARP Experience Corps Mentoring	
24	Adapt A Home	
25	Mend A Home	
26	Children's Fountain Principal & Interest Payment	
27	Pacific Street/Nadaka Park Principal & Interest Payment	
28	Children's Fountain Prepayment	
29	Consolidated Plan/Action Plan Coordination	
30	Do It Yourself Weatherization	
31	MESO	
32	ADA Ramps	

**Table 7 – Project Information** 

# Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Gresham allocates CDBG and HOME funds through a competitive process, with review and input provided by the Community Development and Housing Subcommittee, a 10-person citizen advisory group, along with scoring and review by a technical Advisory Group. Distributions are made in the following prioritized categories: public improvements, housing development/rehabilitation, economic development, and public services. Further, the City gives priority to projects that promote investment in low-income neighborhoods; leverage additional revenue to stimulate private

development; achieve multiple affordable housing or other CDBG priorities; work toward revitalization of the Rockwood Town Center; and, help promote redevelopment of Downtown.

The primary barrier is decreasing funding, over the last several years, in light of increasing demands for projects and services. It is challenging, if not impossible, to make significant changes in the face of changing economies and decreasing levels of public support (federal, state and local) for badly needed projects in all categories.

# **AP-38 Project Summary**

**Project Summary Information** 

1	Project Name	Children's Fountain Principal & Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$75,000
	Description	Children's Fountain Principal and Interest Section 108 Loan Payment
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
2	Project Name	Children's Fountain Prepayment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$170,000
	Description	Prepayment of the Section 108 Children's Fountain loan
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
3	Project Name	Family of Friends Mentoring
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$16,121

	Description	Funds will be used to recruit, train, screen, match, support and evaluate 8 Gresham children and families with 8 volunteer mentors and families.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	8
	Location Description	Citywide
	Planned Activities	
4	Project Name	Sunrise Kitchen Center Entrepreneur Support
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$13,200
	Description	Provides grants to allow for 12 low-income Gresham residents to access the Sunrise Center commercial kitchen.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	12
	Location Description	4233 SE 182nd Ave Gresham, OR 97030
	Planned Activities	
5	Project Name	Program Administration
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention Community & economic development
	Funding	CDBG: \$190,167

	Description	General management, oversight and coordination, staffing of advisory committee (CDHS), contract preparation, environmental review, management or project selection process.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	El Programa Hispano Catolico
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$53,591
	Description	Provide anti-poverty services to 5,100 low-income Latino Gresham residents.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
7	Project Name	Living Solutions
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$210,603
	Description	Project provides training, books and materials for 75 low-income program participants.
	Target Date	6/30/2018

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
8	Project Name	Rent Assistance Admin- Human Solutions
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$47,173
	Description	Provides rent assistance admin funding to prevent homelessness by assisting 75 very low and low-income Gresham households.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
9	Project Name	Willow Tree Transitional Housing
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$48,562
	Description	Funds will be used to subsidize rent for transitional housing and additional supportive services for 77 extremely low-income people.
	Target Date	6/30/2018

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
10	Project Name	AARP Experience Corps Mentoring
	Target Area	
	Goals Supported	Reduce homelessness & increase stability
	Needs Addressed	Basic services & homeless prevention/intervention
	Funding	CDBG: \$18,371
	Description	6 seniors will provide mentoring support to at risk kindergarten to 3rd grade students.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
11	Project Name	Adapt A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$74,944
	Description	Provides people with disabilities accessibility modifications such as wheelchair ramps, handrails, grab bars, etc.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	

	Planned Activities	
12	Project Name	Mend A Home
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$74,944
	Description	Provide critical home repair to low and moderate income homeowners.
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
13	Project Name	Children's Fountain Principal & Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$75,000
	Description	Children's Fountain Principal and Interest Section 108 Loan Payment.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	Project Name	Pacific Street/Nadaka Park Principal & Interest Payment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity

	Needs Addressed	Community & economic development
	Funding	CDBG: \$20,000
	Description	Section 108 Loan Principal and Interest Payment.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
15	Project Name	Children's Fountain Prepayment
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$170,000
	Description	Prepayment of the Section 108 Children's Fountain loan.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
16	Project Name	Consolidated Plan/Action Plan Coordination
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice Reduce homelessness & increase stability Infrastructure, facilities & economic opportunity
	Needs Addressed	Affordable housing choice Basic services & homeless prevention/intervention Community & economic development
	Funding	CDBG: \$10,000

	Description	Payment to City of Portland (PHB) for Consolidated Plan/Annual Action plan coordination. Additionally, staffing of county-wide advisory committee.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
17	Project Name	Do It Yourself Weatherization
	Target Area	
	Goals Supported	Increase & preserve affordable housing choice
	Needs Addressed	Affordable housing choice
	Funding	CDBG: \$6,000
	Description	Workshops for low-income Gresham residents to teach them how to weatherize their homes and provide them with weatherization kits
	Target Date	6/30/2018
	Estimate the number and type of families that will benefit from the proposed activities	
	<b>Location Description</b>	
	Planned Activities	
18	Project Name	MESO
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	CDBG: \$15,000
	Description	Provide culturally competent business technical support services with planning, marketing, access to capital, 3:1 matched savings, and financial reporting to 100 low-income Gresham residents.

	Target Date	6/30/2018
	Estimate the number and	
	type of families that will	
	benefit from the proposed	
	activities	
	<b>Location Description</b>	
	Planned Activities	
19	Project Name	ADA Ramps
	Target Area	
	Goals Supported	Infrastructure, facilities & economic opportunity
	Needs Addressed	Community & economic development
	Funding	Transportation: \$200,000
	Description	Construction of ADA compliant ramps in various locations
		throughout the City.
	Target Date	
	Estimate the number and	
	type of families that will	
	benefit from the proposed	
	activities	
	<b>Location Description</b>	
	Planned Activities	

### AP-50 Geographic Distribution - 91.420, 91.220(f)

# Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of Gresham has not identified specific geographic target areas for this plan, projects are citywide. Allocations are normally made for projects applicable to low-income persons and/or qualifying low-income neighborhoods. The City has set as a priority investing in community infrastructure development and redevelopment in lower-income neighborhoods to safeguard public health, improve livability and promote economic development. Where possible, funds will be leveraged to make substantial improvements in those areas, including increasing economic opportunities. The City works with regional partners to make significant improvements along transportation corridors and in areas targeted for urban renewal, including Rockwood, the Civic Neighborhood, and Downtown. The City will continue to view projects with the objective maximizing impact from investment.

### **Geographic Distribution**

Target Area	Percentage of Funds

**Table 8 - Geographic Distribution** 

Rationale for the priorities for allocating investments geographically

Discussion

# AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Discussion

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## AP-85 Other Actions - 91.420, 91.220(k)

#### Introduction

### Actions planned to address obstacles to meeting underserved needs

Gresham is seeing an increase in poverty as a result of households moving to find more affordable housing, including that affordable to working families. The City prioritizes projects to assist families achieve self-sufficiency and increase earning capacities. Projects included in the annual plan speak to those efforts. In addition, the City works closely with long-term partner providers to reach out to persons in need, including in language and culturally-appropriate methods. Participating in regional transportation and economic efforts, the City seeks to create vibrant hubs and to increase employment, including local entrepreneurs. Gresham continues a strong monitoring practice to maximize the efficacy of funded-efforts.

### Actions planned to foster and maintain affordable housing

The City of Gresham actively supports quality housing that is affordable to all residents. The Rental Inspection Program has been in place since 2007 and has been a model for other jurisdictions. A modest licensing fee has allowed the City to work with landlords to improve properties over the years. The program results in periodic inspection for compliance with a broad range of habitability standards including fire, life, and safety code violations. Common violations found and corrected are visible mold, inadequate ventilation, illegal heat sources, plumbing disrepair, inoperable smoke detectors, and exposed wiring. The inspection program is a practical approach to raised expectations for both landlords and tenants.

To further the objective of quality housing for all segments of the population, the City supports rehabilitation of units to provide permanent accessibility for persons with disability and home repair assistance for lower-income households. In addition, the City provides assistance for lower-income homebuyers in the form of down payment assistance.

The City is also looking forward to improving an array of housing choices for residents in the future. Gresham adopted amendments to the City's Housing Policy in 2013. The Housing Policy project provided new housing data and information on housing trends used to develop housing goals, policies and action measures for Gresham as a whole, Downtown, the Civic Neighborhood and Rockwood. The City is updating this data in the near future. The City is working with partners (Powell-Division Transit and Development Project, Metro, TriMet, the City of Portland, the Oregon Department of Transportation

**Annual Action Plan** 

and Multnomah County) to meet transportation needs of Gresham residents and bring key investments to Gresham. Along with transit elements, plans call for actions for economic development, community enrichment ("placemaking" particularly around hubs), and housing.

The City adopted several guiding principles regarding housing as a guide for affordable housing. In essence these principles recognize that everyone in Gresham deserves a decent, safe and affordable place to live and that sustainable and vibrant communities require a balance of jobs, housing and services. The principles recognized early on that concentrations of poverty and minority populations could block access to opportunities, which is reflected in national policies to promote equal opportunities in all neighborhoods (Affirmatively Furthering Fair Housing). The City promotes a diversity of housing types across all neighborhoods and recognizes that publicly-assisted housing is one component. The City is committed to fostering housing options that working individuals and families can afford. The City will look for new opportunities to preserve and expand housing options for all residents, including low-income residents who need ongoing support.

### Actions planned to reduce lead-based paint hazards

The City of Gresham implements its CDBG and HOME programs in compliance with requirements of the Residential Lead-Based Paint Reduction Act. None of the programs or projects currently funded by Gresham provides in excess of \$5,000 in rehabilitation assistance. Notification and visual inspection requirements will be followed for Gresham's HOME funded homeownership programs. The City of Gresham provides brochures about safe lead practices as part of the homebuyer assistance efforts. Buyers and sellers are required to sign certifications. Inspectors employed in the Rental Inspection Program are trained and certified in safe practices.

Multnomah County complies with federal regulations and continues to work towards increasing small Lead Based Paint contractors through building their capacity through education and safe work practices. The City of Portland has successfully administered three HUD Lead Hazard Reduction Grants, providing over \$12 million dollars in lead hazard reduction assistance to over 1,000 low-income households (protecting over 1,200 children from lead poisoning) since 1998. Gresham is a party to the HUD Regional Lead Paint grant administered by the City of Portland.

### Actions planned to reduce the number of poverty-level families

The City of Gresham has supported a number of projects over the years, and in the current year, to reduce the level of poverty and increase the capacity of families to earn living wages. Workforce development and training efforts are supported through the Living Solutions program which assists low-income persons to gain job skills and then places those individuals in career-path jobs. The City is also

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working with regional partners to improve the transportation system, notably the bus-rapid-transit system (BRT) along Powell and Division and to the employment campuses in northeast Gresham, including Mt. Hood Community College.

The City sponsors a program to encourage small businesses by offering incentives for permits and licenses for remodeling and façade improvements for vacant and some occupied business spaces. The Small Business Center actively assists potential business in Central Rockwood, the Civic Neighborhood or Downtown. To date at least 140 businesses have been helped to the benefit of both the business and the community.

The City is a partner in the Comprehensive Economic Development Strategy (CEDS) and supports links between industry and education (at the high school and higher education levels), supports diversity in the workplace and in industry, and supports activities raising the skills and employability of underrepresented and disadvantaged populations. The Economic Development Traded Sector Jobs Strategy defines the City's vision for targeted job growth and development which relies on existing industry sectors: advanced electronics and specialized machinery and equipment. An integral component is supporting a trained workforce. Part of this development incorporates efforts by WorkSource (WSI) and Mt. Hood Community College which is developing an industry-supporting curriculum in mechatronics (the interface between machines and software).

### Actions planned to develop institutional structure

The City of Gresham and East Multnomah County will hold joint, semi-annual meetings with service providers to assess current community conditions impacting low- and moderate-income households. These discussions include updates on social services accomplishments in working with the population, as well as, service gaps or needs in the community.

The City of Gresham is a member of a Regional Fair Housing work group comprised of representatives from the Portland/Vancouver Metro Area that receive federal funding and must deploy that funding in the context of a Fair Housing Assessment and Plan. The jurisdictions and organizations that have chosen to meet are Multnomah County, Clark County, Clackamas County, Washington County, City of Gresham, City of Beaverton, City of Portland, State of Oregon and the Fair Housing Council of Oregon. We recognize that many fair housing issues cross jurisdictional boundaries and may require a regional approach. We meet to learn from each other about how best to meet our federally mandated fair

housing planning and implementation.

The City of Gresham continues to strengthen in-house delivery by monitoring sub-recipients annually and by increasing staff development through HUD training and regional coordination.

# Actions planned to enhance coordination between public and private housing and social service agencies

As noted, the City participates in the Comprehensive Economic Development Strategy (CEDS), as well as in regional transportation planning efforts. Both contain strategies that encompass whole communities and neighborhoods that includes outreach to residents and businesses. Strategies are cross-cutting recognizing that real opportunity is inclusive – housing, transportation, jobs, shopping, services, and recreation. The City will continue to participate in regional strategies. The City of Gresham is a member of the Continuum of Care and will continue to provide input and act on recommendations. Acting alone and with Multnomah County and the City of Portland, Gresham encourages partnerships across public and private sectors. Rockwood Speaks is a prime example of outreach in a community, bringing residents, businesses and outside expertise together to create real solutions in a neighborhood.

The City of Gresham and East Multnomah County have both been instrumental in sponsoring the work of the East County Caring Community, which is a community-wide initiative that links, coordinates, and advocates for housing and social services supports for the low- and moderate-income residents of East County. Four area school districts are involved in the effort – Reynolds, Gresham-Barlow, Centennial, and David Douglas.

### Discussion

# **Program Specific Requirements**

# AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

Gresham receives HOME funding through the Consortium. During the annual application process, Gresham determines which projects qualify and which projects will receive funding for both CDBG and HOME funds. Gresham and Portland enter into an IGA related to HOME funds and the projects Gresham will be funding for that fiscal year.

# Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the	
next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the	
year to address the priority needs and specific objectives identified in the grantee's	
strategic plan.	650,000
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use	
has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	650,000

### **Other CDBG Requirements**

1. The amount of urgent need activities

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

100.00%

0

Discussion