



Town of Christiansburg

2024

Community Development Block Group

Annual Action Plan

Presented to
U.S. Department of Housing and Urban Development

DRAFT

Review period from April 15, 2024 to May 15, 2024

Executive Summary

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

1. Introduction

The Town of Christiansburg has prepared an Annual Action Plan in order to implement our community's federal program funds from the U.S. Department of Housing and Urban Development (HUD). This Plan is for the period of July 1, 2024 to June 30, 2025. This is part of the 2022-2026 Consolidated Plan is developed with citizen participation and serves as the Town's application for federal funds. Once in place, the Plan provides guidance for the Town's community development investment decisions that is consistent with public concerns and needs. The Town will receive approximately \$130,404(based on previous year's allocation) in CDBG funds annually to assist the Town of Christiansburg with eligible programs to meet community development and housing needs. Over the term of the five year plan, approximately \$525,000 to \$600,000 is expected to be available, with 20% of that can be used for planning activities and administration of the program. Each year, the Town will prepare an Annual Action Plan that outlines the specific program activities to be carried out in meeting the Consolidated Plan strategies. The Town will focus on partnerships and collaborations to foster successful projects and leverage funds in order to address needs for low income and homeless housing, services for special needs and low income persons, along community and economic development needs.

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.

Community Development Block Grant (CDBG) funds will be used over the next five years to address the needs outlined in the Strategic Plan. HUD's objectives guiding the proposed activities are:

1. Benefit to low- and moderate income (LMI) persons.
2. Meet urgent needs to alleviate emergency conditions.

The CDBG goals for Program Year 2024 are targeted to benefit as many residents of the Town as possible. In conjunction with the national objective that activities should benefit low-to-moderate income neighborhoods within the Town. Historically the Town has one Low-to-Moderate income census tract block group (Census Tract 208.02, Block Group 2). This area is known as the Park District and is

bordered by Roanoke Street to the southwest, south, Depot Street to the east, and East Main Street to the north, northeast. This area has had more than 50% of residents in households earning at/or below 80% of the Area Median Income and are considered a Low to Moderate Income (LMI) family. The overall LMI rate for the Census Tract 208 is 56% in accordance with the U.S. Department of Housing and Urban Development's Office of Policy Development and Research's Low to Moderate Income Population by Tract GIS website.

The proposed funding enables the Town to benefit LMI residents in several different ways:

Goal 1: Public Infrastructure Improvements in designated Census Tract block groups within the Town of Christiansburg.

Action 1 - Assist with funding the installation of sidewalk and the associated drainage improvements along East Main Street.

Action 2 - Water and Sewer Improvements in High Priority locations.

Goal 2: Help provide emergency housing assistance and increase opportunities for aging and disabled citizens to remain independent in their homes.

Action 1 - Assist with ADA accessibility improvements

Action 2 - Provide Emergency Home Repair

Goal 3: Help prevent homelessness

Action - Provide resources to help prevent homelessness for short-term emergency situations through the Homeless Intervention Program.

Goal 4: Furthering Fair Housing

Action 1 - Work the NRV HOME Consortium to Complete an Assessment of Fair Housing prior to initiation to the next Consolidated Plan to guide the development of an Analysis of Impediments to Fair Housing.

3. Evaluation of past performance

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

The Town of Christiansburg continued to use CDBG funds for infrastructure projects within the Town's Park District (Census Tract 208.02; Block Group 2). Funding during the 2017-2021 Consolidated Plan

period was prioritized for COVID response, public services and public infrastructure improvements.

Activities included:

- Sidewalk/drainage improvements on Park Street from Hagen Street to Depot Street
- Waterline replacement(on-going) on Park Street, Junkin Street, and Montague Street
- Prevention of homelessness through the Homeless Intervention Program through the response to COVID 19

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The Town participates the New River Valley Housing Partnership meetings with other localities and service providers. Attending these meetings and working with the different interested groups provides valuable insights into the needs of our most vulnerable populations. Two public input meetings are scheduled to provide additional forum for public input. A 30-day public comment period was provided to obtain comments on the proposed Consolidated Plan and this year's Action Plan. A public hearing is provided as part of the citizen participation process.

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.

To date, no comments or input from the public have been received.

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

To date, no comments or input from the public have been received.

7. Summary

The Annual Action Plan is a component of the overall Consolidated Plan and reflects a coordinated planning with citizen participation to identify the top priority needs within the Town of Christiansburg. The goals identified in the Consolidated Plan are in attempts to maintain quality housing, provide public services, and provide or improve public infrastructure within the Town's Low to Moderate Income area. This plan outlines the programs that the Town will pursue over the next year.

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.

Lead Agency	Agency Role	Name	Department/Agency
	CHRISTIANSBURG		
CDBG Administrator	CHRISTIANSBURG		Town Manager's Office
HOPWA Administrator			
HOME Administrator			
HOPWA-C Administrator			

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

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

1. Introduction

The Town of Christiansburg has historically invested allocated funds through this program to upgrade infrastructure in a Town designated LMI census block group. The Town staff is increasingly observing an increase in deferred property maintenance and nuisance issues in its older areas of Town in and out of the Town's designated LMI census block group for the CDBG project. Emergency Home Repair is a project identified in this project. Since many areas of Town have a balance of households with varying levels of socio-economic levels, it is difficult to show the demand for affordable housing that exists throughout Town. The lack of affordable housing is being discussed in Christiansburg more and more by Community Housing Development Organizations, property owners, renters, and the general public. The limited amount of CDBG funds allocated to the Town limit its ability to leverage funding towards affordable housing options.

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(l)).

The New River Valley HOME Consortium developed an outreach plan to maximize input from a diverse cross-section of stakeholders. This outreach included participation in ongoing planning efforts such as the NRV Livability Initiative, the Aging in Place Leadership Team, and the NRV Housing Partnership. One effort in the last several years, non-profit and social service agencies have met with NRV HOME Consortium and participating localities and identified a need for a comprehensive list of housing services and rental options for the NRV. The guide includes two components:

1. A list of housing services including emergency shelters, energy assistance and weatherization, fair housing, home repair financing, home modifications, housing choice vouchers (rental assistance), housing counseling and education, and legal assistance.
2. A listing of affordable rental housing with information including unit size, price range, estimate of tenant-paid utility cost, proximity to services, age, accessibility features, and contact information.

The Town of Christiansburg staff participated in this process and was able to identify many existing resources within our locality.

Localities within the New River Valley have also undertaken a housing study that was led by the New River Valley Regional Commission. Items to looked at were data analysis, market demand analysis, market supply analysis, a housing gap analysis, and vacancy rates.

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.

A comprehensive continuum of care system is necessary to effectively address homeless needs. This system must provide three basic components. First, there must be an immediate alternative to being unsheltered including not only emergency shelter, but an assessment of an individual's or family's needs. Second, there is a need for transitional housing and rehabilitative services. This aspect of the system should include services such as substance abuse treatment, interim mental health services, training in independent living skills, and many others dependent upon the individual needs. The final step is permanent housing that includes permanent supportive housing arrangements.

Homeless individuals and families will not necessarily need access to all of the above components, but this coordinated system is critical as an overall effort to overcome homelessness. In addition, there must be a strong homeless prevention strategy to ensure increasing numbers of homeless does not overwhelm the above system. In fact, prevention of homelessness, by stabilizing precarious housing arrangements, is significantly less costly than providing emergency shelter and food.

The Town supports the efforts and attends meetings of the New River Valley Housing Partnership organized by the Homeless & Housing Programs Coordinator of New River Community Action (now Causeway Community Action). This group combats homelessness directly by coordinating point-in-time counts, tracking veteran homelessness in our area, and increasing opportunities for housing our most vulnerable populations by working with landlords to fight stigmas and promote openness to housing individuals.

Since the Town of Christiansburg does not have social service programs to directly assist the homeless, we are fortunate to have the Causeway Community Action, a local agency that administers the Homeless Intervention Program (HIP) for the region. The HIP program prevents the displacement of low and moderate-income households who are in danger of becoming homeless, assists those who are homeless to secure permanent housing, and assists individuals to regain self-sufficiency. The program provides no interest loans for mortgages and deposit assistance, as well as rent-payment grants to eligible people in the New River Valley. Not only does Causeway Community Action administer the HIP program, but the agency has also taken the lead to develop a Homeless Prevention Plan for the New River Valley. Many religious institutions and the regional community services organization have combined to create a "thermal shelter" during the coldest months to house homeless men in the New River Valley.

The Town of Christiansburg will support in general applications for related programs and resources to assist in the prevention of homelessness from eligible non-profit organizations and other groups. When the Town is also an eligible applicant, it will seek to coordinate any application with other relevant organizations so program benefits will be delivered to citizens as effectively and seamlessly as possible.

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 Town is not a recipient of ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	NEW RIVER COMMUNITY ACTION
	Agency/Group/Organization Type	
	Services - Housing	
	Services-Children	
	Services-Persons with Disabilities	
	Services-Victims of Domestic Violence	
	Services-homeless	
	What section of the Plan was addressed by Consultation?	
	Housing Need Assessment	
	Homeless Needs - Chronically homeless	
	Homeless Needs - Families with children	
	Homelessness Needs - Veterans	
	Homelessness Strategy	
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
	Causeway Community Action reached out to local governments and the New River Valley Regional Commission to develop a homeless prevention plan.	
	Causeway Community Action has assisted with the annual Point in Time survey for the Continuum of Care. The goal is to provide local governments with a plan as a resource to prevent homelessness. NRV HOME Consortium invited Causeway staff to participate in a housing needs survey that created local input to Consortium's current ConPlan	
2	Agency/Group/Organization	New River Valley Community Services
	Agency/Group/Organization Type	
	Services-Elderly Persons	
	Services-Health	
	Service-Fair Housing	
	Child Welfare Agency	
	What section of the Plan was addressed by Consultation?	
	Anti-poverty Strategy	
	Lead-based Paint Strategy	

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	New River Valley Community Services is the public provider of behavioral health services to residents of the New River Valley. NRVCS offers community-based programs for both children and adults who are living with mental illness, developmental disabilities and/or substance use disorders. It is recognized these all have the ability to contribute to homelessness. NRV HOME Consortium invited NRVCS staff to participate in a housing needs survey that created local input to Consortium's current ConPlan.
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Identify any Agency Types not consulted and provide rationale for not consulting

N/A

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	New River Housing Partners	Ensure that all regional housing providers are working in collaboration with one another to address homelessness

Table 3 - Other local / regional / federal planning efforts

Narrative

The Town of Christiansburg is a member of the NRV HOME Consortium and continues to work together with other public entities to ensure that coordination and cooperation in the implementation of the Consolidated Plan.

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 Town of Christiansburg invites citizens to review and comment on the Action Plan over a 30-day comment period. Notification is printed in the local daily newspaper (the News Messenger), and the Plan was posted to the Town website for public viewing. The public was invited to attend a public hearing if they wanted to make comments publicly, and were also invited to submit their comments by phone, mail or email.

Citizen Participation Outreach

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)
1	Public Meeting	Non-targeted/broad community	No comments received to date.	No comments received to date.	N/A	
2	Public Hearing	Non-targeted/broad community	No comments received to date.	No comments received to date.	N/A	
3	Newspaper Ad	Non-targeted/broad community	.		N/A	
4	Internet Outreach	Non-targeted/broad community	No comments received to date.	No comments received to date.	N/A	www.christiansburg.org

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The Town of Christiansburg receives a direct allocation from the Department of Housing and Urban Development. The amounts in the table below is estimated based off our current CDBG allocation for Program Year 2021. With the limited amount of available funding, funds are targeted for specific activities that will have the most impact on many of the needs in the Town of Christiansburg.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services				130,000	0 643,927.68 773927.68 260,000

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

Annual Action Plan
2024

11

The Town will provide all necessary oversight and project management staffing for the implementation of these programs. Because of the limited funds available for administration and planning, it is expected that a significant portion of these staffing hours will be absorbed by the Town's general operations budget. The Town will use State-funding and general fund sources to address the activities in this Consolidated Plan for infrastructure projects if funding is granted and needed.

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

N/A

Discussion

The Town will continue to identify ways to leverage public and private funds to address the goals outlined in the Consolidated Plan.

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	Public Improvements and Infrastructure	2022	2026	Non-Housing Community Development	Park Street District	Public Improvements and Infrastructure	CDBG: \$130,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1929 Persons Assisted
2	Provide Public Service	2022	2026	Non-Homeless Special Needs Non-Housing Community Development	Town of Christiansburg	Public Service Support Homelessness	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 Persons Assisted	
3	Emergency Home Repair	2022	2026		Town of Christiansburg	Emergency Home Repair Homelessness	Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Improvements and Infrastructure
	Goal Description	The primary project is to complete a sidewalk on Main Street within the designated LMI area (the Park District).
2	Goal Name	Provide Public Service
	Goal Description	The primary goal is to continue work on addressing homelessness prevention with service providers like Causeway
3	Goal Name	Emergency Home Repair
	Goal Description	The goal is to establish an on-going program with providers like Habitat of Humanity of the NRV to address need.

AP-35 Projects - 91.420, 91.220(d)

Introduction

This section outlines the project for the 2024 Annual Action Plan.

#	Project Name
1	Emergency Home Repair
2	Planning and Administration
3	Public Services
4	East Main Street Infrastructure

Table 7 – Project Information

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

The allocation of priorities is to recognize the historical priority of supporting infrastructure priorities in the Park District, while needing to address other needs among our LMI community

throughout Christiansburg and recognizing projects like Emergency Home Repair allow us to spend dollars more immediately on identified priorities.

Annual Action Plan

2024

16

AP-38 Project Summary	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Estimate the number and type of families that will benefit from the proposed activities	Location Description	Planned Activities
Emergency Home Repair	Town of Christiansburg	Emergency Home Repair	Emergency Home Repair	\$50,000	Work with a qualified local service provider in order to provide needed repairs to LMI households to prevent living in substandard conditions and potentially homelessness.	FY 2024	Rental Units rehabilitated:3 household units; Homeowner housing rehabilitated: 3 household units	Qualifying Property Owners within the Town of Christiansburg	Working with Habitat for Humanity of the NRV to identify eligible properties for repair and conduct roof and flooring repairs and other limited home repair projects.
Planning and Administration	Town of Christiansburg	Provide Public Service	Public Service	\$26,000	This supports Staff's efforts to administer the CDBG program for this year. It is approximately 20% of the proposed annual	FY 2024	Support CDBG program as a whole.	N/A	Facilitate program

Public Service	Town of Christiansburg	Provide Public Service	\$10,000	This would be providing homelessness prevention and complementing the work done with the CDBG-CV funding.	FY 2024	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 person assisted
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Project Summary Information

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 Town of Christiansburg has Low to Moderate families in need across the town. Public Services and Emergency Home Repair will target LMI families that have not been eligible for support previously.

Geographic Distribution

Target Area	Percentage of Funds
Park Street District	90
Town of Christiansburg	10

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Town of Christiansburg has worked on infrastructure projects in the Park District neighborhood (Census Block Group 020800-02). Over 55% of the residents of the Census Block Group 020800-02 are low-moderate income persons. The sidewalk project—IDIS Activity 36--was listed as the highest priority for the Goals and Objectives which extended back for the period between 2010-2015 also. Additional improvements to drainage, water and sewer infrastructure were included in this project list. The waterline project—IDIS Activity 37-- was also identified in this census block as substandard. It was identified as a higher priority since sidewalk projects require leveraged state and general funds and this project could be accomplished with the allocated CDBG funds. The next infrastructure project designated is sidewalk and drainage improvements to East Main Street from Park Street to High Street. RKK Engineering is under contract for the design of the sidewalk and it is scheduled to be bid out once the engineering is complete.

The funding directed to infrastructure is a way to meet some of the needs for the LMI area defined as Census Block Group 020800-02. Below is data based on the 2010 Census showing the Low to Moderate income population in the designated block group. This has been the focus area of

the Town's CDBG program for over 10 years. Included below are statistics from the 2010 Census Tract-Block Groups for Christiansburg.

Discussion

Town of Christiansburg target area funds will be dispersed throughout the Town based upon need, funding availability and recipient's ability to leverage resources to CDBG funded activities. Funds are allocated to eligible activities based on meeting a national objective, eligibility, and identifying of needs.

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

Introduction

The Town of Christiansburg along with all localities in the region recently participated in the NRV Regional and Local Housing Study, a comprehensive housing market analysis and needs assessment. As part of this process, local stakeholders worked with the New River Valley Regional Commission, the Virginia Center for Housing Research and Housing Forward Virginia to better understand the housing needs of their communities and to develop strategies to best meet these needs. Several of the strategies that came out of the study involve amending and developing public policies to ensure that barriers to the development of adequate and affordable housing are addressed. Education and increased awareness of how policies can work to support local housing needs was an important step toward an informed approach to effecting change.

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

All participating localities in the NRV Regional and Local Housing Study (2021) developed strategies, as part of the process, to address local affordable housing challenges. The following strategies will include removal or amelioration of public policies that create barriers to implementation of affordable housing, and create new ones that support development options. Five strategies for housing for Christiansburg outlined in the report were:

1. Preserve and Improve Aging Townhouse Communities
2. Consider Expansion of Accessory Dwelling Unit Allowances
3. Improve/Strengthen Code Enforcement and Inspection Programs
4. Promote Adaptive Reuses of Institutional Properties
5. Align Housing and Community Development Efforts

Some implementation work has already begun with these strategies. For example, the Town hired a Neighborhood Services Coordinator to assist in addressing code enforcement issues in a manner to develop a path forward for the individual homeowner to come into compliance and

Annual Action Plan
2024

improve the quality of life in our neighborhoods.

Discussion

Many aging residents living on fixed and limited incomes are in older housing stock that tends to have deferred maintenance issues. Addressing this type of issue will be a continuing challenge for the Town.

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

Introduction

The Town continues to use its entitlement funds to provide assistance with activities that meet the underserved needs of the Community.

Actions planned to address obstacles to meeting underserved needs

The Town will continue to work with area agencies in attempt to leverage resources that will effectively help meet the goals of the program.

Actions planned to foster and maintain affordable housing

The Town will utilize funding to maintain affordable housing through the Emergency Home Repair program.

Actions planned to reduce lead-based paint hazards

The Town does not have the resources or expertise necessary to implement a lead poisoning prevention program. Instead, the Town will work with the local health department to provide as effective a program as possible. To this end, the following steps will be taken over the next five years to improve local understanding and efforts to reduce lead-based paint hazards in the Town: 1. Engage in analysis and study to determine and track lead hazards in the Town. 2. Support efforts by the Health Department to reduce lead hazards in the community. The Health Department reports a very low incidence of lead poisoning the entire New River Valley health district. Significant progress continues on a nationwide basis to reduce the incidence of lead paint poisoning.

Actions planned to reduce the number of poverty-level families

During the 2024 Program Year, the Town will support area public service agencies that directly assist with helping to reduce poverty-levels.

Actions planned to develop institutional structure

Town staff was responsible for overseeing the creation of the 2022- 2026 Consolidated Plan and the current PY 2024 Action Plan. The Town is part of the New River Valley HOME Consortium, with the Town of Blacksburg as the lead agency. Staff is committed to continuing their education in administering the CDBG program by participating in available trainings and webinars.

Actions planned to enhance coordination between public and private housing and social

service agencies

- * The Town will continue its active role in the regional Continuum of Care as a member of the Board and other local agencies that provide resources to low to moderate income persons.

Discussion

The Town will continue to look at additional ways to expand existing and find new opportunities that addresses the needs of our low to moderate income residents.

Program Specific Requirements

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

Introduction

The Town does not participate in program income.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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.	0
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:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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%

Discussion

It is estimated that 100% of the funds will be used to benefit persons of low and moderate income during the 2021-2026 Program Year. Planning and Administration is not included in the low and moderate calculation