Executive Summary

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

1. Introduction

Annually, HUD allocates a series of grants to local jurisdictions for community development activities. The City of Gilroy is an entitlement jurisdiction (cities with a population above 50,000 people, a requirement to receive these entitlement grants). As such, the City is subject to Title I of the National Affordable Housing Act which mandates that jurisdictions prepare a five-year Consolidated Plan. That Plan identifies local community development needs and sets forth a strategy to address these needs over a five-year period. The Consolidated Plan must address both affordable housing and non-housing related community development needs. The needs are targeted to low and very low-income persons and/or who reside low-income areas.

Also required is the need to prepare an Annual Action Plan (AAP) for each of the five years included in the five-year Consolidated Plan. This next CDBG program year, Fiscal Year 2019-2020 (HUD Program Year 2019), represents the fifth year of the current City Council adopted five-year Consolidated Plan. This FY 19/20 AAP will address how the City of Gilroy plans to address the strategies listed in the Consolidated Plan for the period of July 1, 2019 - June 30, 2020. The City anticipates a CDBG allocation for this fiscal year of \$476,592 as well as an additional \$30,000 in Program Income, and \$168,000 in HTF funds.

Any minor changes (i.e. typos, minor edits, changes that do not affect the essence of the document) to this Plan will be completed through a minor amendment process that will not require further citizen participation or City Council approval. Substantial amendments (i.e. funding changes, re-allocation of project monies, etc.) will follow the City's citizen participation plan, and require a public hearing and Council approval.

This will be considered the City's 1st Substantial Amendment to its 2019/2020 Action Plan. Due to projects that did not come to fruition, staff recognized the need to develop a new project to address a large amount of monies that were being underused. Staff determined the best use of this money would be an infrastructure project, as the last two action plans proposed general improvements, but no specific projects. The new project will utilize approximately \$549,229 in CDBG monies and will focus pedestrian safety with sidewalk installation and curb ramps to meet ADA accessibility.

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.

HUD has established a set of outcomes and objectives entitlement jurisdictions need to address. The outcomes and objectives are noted within each of the twenty-two Goals included in the Strategic Plan (SP-45) section of the Consolidated Plan. In summary, they are as follows:

- Outcomes: Availability/Accessibility; Affordability; Sustainability
- <u>Objectives</u>: Create suitable living environments; Provide Decent Affordable Housing; Create Economic Opportunities

The outcomes and objectives are noted within each of the twenty-two Goals included in the Strategic Plan (SP-45) section of the Consolidated Plan. In Fiscal Year 2019-2020, the City will address twenty of the twenty-two goals noted in the Consolidated Plan. Details on which goals the City will address as well as how the City plans to do so are noted in Section AP-20 "Annual Goals and Objectives" of this AAP.

3. Evaluation of past performance

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

A meaningful evaluation of past performance is integral to determine what has been accomplished and what work is necessary to address the myriad of needs in the community. This evaluation included a review of past Consolidated Plans and AAPs as well as the successes achieved through the Neighborhood Revitalization Strategy. Through this evaluation, the City was able to compare the needs identified through this Consolidated Plan and compare them to the activities that have taken place in the past to determine if those activities are still necessary. Priority needs, and goals were then formulated to meet these needs with an eye to what has been successful in the past and what is necessary in the future.

The City will report, in detail, on its performance in the FY 19-20 Consolidated Annual Performance Evaluation Report (CAPER) due to HUD in September 2019. As in integral function of preparing for the CAPER, City of Gilroy Housing and Community Development (HCD) staff monitors financial and program performance of CDBG and HTF funding sub-recipients on a quarterly basis. Depending upon the results of that review, staff works with sub-recipients to achieve spending and performance objectives.

The City of Gilroy continues to meet the requirements set forth in the HUD regulations that govern the CDBG (CDBG) program. These include thorough programmatic and financial oversight of funded projects; appropriate budgeting and expenditure of funds based on HUD financial requirements; and,

insuring the community continues to receive the necessary services identified through goals established in the development of the five-year Consolidated Plan.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Public participation plays a central role in the development of the Consolidated Plan. As a precursor to the development of the FY 19-20 (FY 19-20) AAPs, the City Council held a series of three Noticed, for thirty days, Public Hearings, heard citizen comments and approved priorities for funding allocations. The priorities are incorporated into the FY 2019-2020 draft AAP.

Prior to the award of public service and housing rehabilitation funds the Community and Neighborhood Revitalization Committee (CNRC) met three times to review the planned CDBG and HTF funding process, Council priorities and discuss the adopted rating and ranking process for the potential applications to be submitted by non-profit agencies wishing to receive funding. On February 4, 2019 City Council adopted CDBG priorities. On March 4, 2019 City Council adopted HTF priorities, and on April 15, 2019 CNRC recommended CDBG and HTF funding allocations for non-profit provided low income public services and a housing rehabilitation grant program.

On March 20, 2019, the CNRC conducted interviews of each applicant. Then on March 27, 2019 the Committee rated and ranked each applicant and determined recommended funding amounts for each of the eight non-profit applicants. The CNRC's funding recommendations were forwarded to the City Council for draft approval of the first of a two-year funding cycle at its April 15, 2019 Public Hearing meeting. All meetings of the CNRC were properly noticed and opened to the public. Further, the Committee met again on April 24, 2019 and finalized its recommendations to City Council for CDBG and HTF funding allocations.

All public hearings were published in the <u>Gilroy Dispatch</u>, the local newspaper. The draft Action Plan was made available on April 5, 2019 for public comment on the City's website as were public notices in English and Spanish. A hard copy of the draft Action Plan and notices were made available at the Community Development/Planning Counter of the City of Gilroy and at the Gilroy Public Library. The notices were also posted at City Hall in a location reserved for public notices. The public hearings were broadcast on Public TV Channel 17. Notices of public comment opportunities were emailed to the following group lists: South County Collaborative, Housing Advisory Committee, South County Homeless Task Force, and the CNRC as well as to the applicants for funding.

Substantial Amendment #1

After determining that a substantial amendment would be required, the City followed HUD regulations in meeting citizen participation requirements. A notice was advertised in the Gilroy Dispatch Newspaper

on January 24, 2020, which allowed for a comment period for 30 days, ending on February 24, 2020. In addition, a public hearing at the City Council was held on February 24, 2020.

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 will incorporate any comments received during the 30-day public comment period in the draft submitted to HUD. At the City Council meeting of April 15, 2019 two members of the public commented on the funding allocation process for non-profit public services, including representatives of Silicon Valley Building Together and the Gilroy Compassion Center. Both gave the Council a short overview of the services they provide in Gilroy for low income families and individuals.

Substantial Amendment #1

Public comments will be addressed once comment period has concluded.

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

The City will incorporate all comments or views when received.

7. Summary

In summary, the FY 19-20 Annual Action Plan represents year five of the five-year Consolidated Plan. It will continue to address the priorities identified in the Consolidated Plan. The plan was developed following a public input process and will address the community development needs of the City of Gilroy.

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	GILROY	Community Development Department

Table 1 - Responsible Agencies

Narrative

The City of Gilroy (City) is the Lead Agency for the United States Department of Housing and Urban Development (HUD) entitlement programs. The City's Housing and Community Development section of the Community Development Department is responsible for the administration of HUD funded Community Development Block Grant Program (CDBG). By federal law, each jurisdiction is required to submit to HUD a five-year Consolidated Plan and Annual Action Plans listing priorities and strategies for the use of federal funds.

Consolidated Plan Public Contact Information

Kristi Abrams

Director of Community Development

(408) 846-0467

Kristi.abrams@cityofgilroy.org

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

1. Introduction

The FY 19-20 AAP represents the fourth year of the five-year Consolidated Plan. Development of the Action Plan utilized the consultative process used for the 2015-2020 Consolidated Plan (Consolidated Plan). The Consolidated Plan was done in collaboration with eight entitlement jurisdictions. These jurisdictions were:

- City of Cupertino
- City of Gilroy
- City of Mountain View
- City of Palo Alto
- City of Sunnyvale
- City of San José
- City of Santa Clara
- Santa Clara Urban County

Public participation played a central role in the development of the Consolidated Plan. The participating jurisdictions within the County launched an in-depth, collaborative regional effort to consult with community stakeholders, elected offices, City and County departments, and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within the five-year plan.

The participating jurisdictions, in partnership with LeSar Development Consultants (LDC) and MIG, Inc. (MIG), facilitated a comprehensive outreach process to enhance coordination and discuss new approaches to working with public and assisted housing providers, legal advocates, private and governmental health agencies, mental health service providers, and other stakeholders that utilize funding for eligible activities, projects, and programs.

A Regional Needs Survey was conducted to solicit input from residents and workers in the region. Respondents were informed that participating jurisdictions were updating their respective Consolidated Plans for federal funds that primarily serve low- and moderate-income (LMI) residents and areas. The Regional Needs Survey polled respondents about the level of need in their respective neighborhoods for various types of improvements that could be addressed by entitlement funds.

A total of 1,472 survey responses were obtained from September 19, 2014 to November 15, 2014, including 1,078 surveys collected electronically and 394 collected via print surveys.

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)).

Regional Forums

The participating jurisdictions held three regional public forums to identify housing and community development needs and priorities for the next five years. The public forums were conducted as part of a collaborative regional approach to help the participating jurisdictions make data-driven, place-based investment decisions for federal funds. Seventy-six (76) people attended the regional forums, including community members, service providers, nonprofit representatives, and interested stakeholders.

Community Forums in Local Jurisdictions

In addition to the regional forums, several participating jurisdictions conducted public outreach independent of the regional collaborative. The cities of San Jose and Mountain View, and the Santa Clara Urban County, each held multiple community forums to solicit public input on local issues, needs and priorities. The community forums were held in tandem with the regional public forums to expand the outreach process and gather specific place-based input. One hundred and thirty-three (133) individuals attended the community forums, including residents, service providers, nonprofit representatives, and interested stakeholders.

Outreach

Approximately 4,847 entities, organizations, agencies, and persons were directly engaged via outreach efforts and asked to share materials with their beneficiaries, partners, and contacts. These stakeholders were also encouraged to promote attendance at the public forums and to solicit responses to the Regional Needs Survey. Stakeholder engagement included phone calls, targeted emails, newsletter announcements, social media posts, and personalized requests from staff of the Entitlement Jurisdictions. Each participating jurisdiction also promoted the regional forums and regional survey links on their respective websites and announced the Consolidated Plan process through electronic mailing lists. Outreach materials and the survey links (including materials in Spanish) were emailed to over 4,000 entities, organizations, and persons.

Approximately 1,225 printed flyers providing public notice about the regional forums were distributed throughout the County at libraries, recreation centers, community meeting locations, and organizations benefiting LMI residents and areas. These flyers were available in English and Spanish.

Print newspaper display ads also were posted in the *Gilroy Dispatch* (English), *Mountain View Voice* (English), *El Observador* (Spanish), *La Oferta* (Spanish), *Thoi Bao* (Vietnamese), *Philippine News* (Tagalog), *World Journal* (Chinese) and *San Jose Mercury News* (English). In addition, an online display ad was placed in the *San Jose Mercury News* to reach readers electronically.

Annual Action Plan

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.

The Santa Clara County Continuum of Care (CoC) is a multi-sector group of stakeholders dedicated to ending and preventing homelessness in the County of Santa Clara (County). The CoC's primary responsibilities are to coordinate large-scale implementation of efforts to prevent and end homelessness in the County.

In winter 2015, the CoC partnered with Destination: Home, a public-private partnership committed to collective impact strategies to end chronic homelessness and released a Community Plan to End Homelessness in Santa Clara County (the Plan), which outlines a roadmap for community-wide efforts to end homelessness in the County by 2020. The strategies and action steps included in the Plan were informed by members who participated in a series of community summits designed to address the needs of homeless populations from April to August 2014. The Plan identifies strategies to address the needs of homeless persons in the County, including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. Additionally, it also intended to address the needs of persons at risk of homelessness. The Plan aims to implement the following strategies: [1]

- 1. Disrupt systems: Develop disruptive strategies and innovative prototypes that transform the systems related to housing homeless people.
- 2. Build the solution: Secure the right amount of funding needed to provide housing and services to those who are homeless and those at risk of homelessness.
- 3. Serve the person: Adopt an approach that recognizes the need for client-centered strategies with different responses for different levels of need and different groups, targeting resources to the specific individual or household.

Over the next five years, the Plan seeks to identify approximately 6,000 new housing opportunities for the homeless, intending to house 2,518 homeless individuals, 718 homeless veterans, and more than 2,333 children, unaccompanied youth, and homeless individuals living in families.

Members of the CoC meet on a monthly basis in various work groups to ensure successful implementation components of the Plan's action steps. A Community Plan Implementation Team, which includes members of the CoC and other community stakeholders, meets quarterly to evaluate progress toward the Plan's goals, identify gaps in homeless services, establish funding priorities, and pursue an overall systematic approach to address homelessness.[2]

Annual Action Plan

[1] Santa Clara County CoC. "Community Plan to End Homelessness in Santa

[2] Ibid.

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

Allocating Funds, Setting Performance Standards and Evaluating Outcomes

The city is not an ESG entitlement jurisdiction.

Operating and Administrating Help Management Information System (HMIS)

The HMIS SCC project is administered by Bitfocus and has served the community since 2004. The project meets and exceeds HUD's requirements for the implementation and compliance of HMIS Standards. The project has a rich array of service provider participation and is utilized to capture information and report on special programming, such as Housing 1000, the County VTA free bus pass program, and prevention service delivery. [1]

[1] County of Santa Clara. Consolidated Annual Performance and Evaluation Report (CAPER). 2014

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Gilroy Compassion Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted.	NOTE: Additional agencies, groups and organizations were
	What are the anticipated outcomes of the consultation or areas for	included in the final draft of the Consolidated Plan and are
	improved coordination?	attached to the FY 19-20 Annual Action Plan.

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

Not Applicable

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	Regional Continuum of Care Council	The Continuum of Care works to alleviate the impact of homelessness in the community through the cooperation and collaboration of social service providers. This effort aligns with the Strategic Plan's goal to address homelessness.
City of Gilroy Housing Element	City of Gilroy	The Housing Element outlines the City of Gilroy goals, policies, and implementation programs for the preservation, conservation, improvement, and production of housing for the 2015-2023 planning period. The Housing Element identifies the specific actions the City will take to address existing and future housing needs. This effort aligns with the Strategic Plans goal to address affordable housing issues through implementation of the plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2012-2014 Comprehensive HIV Prevention & Care Plan	Santa Clara County HIV Planning Council for Prevention and Care	This plan provides a roadmap for the Santa Clara County HIV Planning Council for Prevention and Care to provide a comprehensive and compassionate system of HIV prevention and care services for the County. This effort aligns with the Strategic Plan's goal to provide basic and supportive services to special needs populations
Affordable Housing Funding Landscape & Local Best	Cities Association of Santa Clara County and Housing Trust Silicon Valley	This report provides a comparison of the different funding strategies available for affordable housing in the County, and the best practices for funding new affordable housing. This effort aligns with the Strategic Plan's goal to support the development of affordable housing.
Regional Housing Need Plan for the San Francisco B	Association of Bay Area Governments	This plan analyzes the total regional housing need for Santa Clara County and all of the Bay Area. This effort aligns with the Strategic Plan's goal to support the development of affordable housing.
Community Plan to End Homelessness in Santa Clara	Destination: Home	The Community Plan to End Homelessness in the County is a five-year plan to guide governmental actors, nonprofits, and other community members as they make decisions about funding, programs, priorities and needs. This effort aligns with the Strategic Plan's goal to address homelessness.

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

A comprehensive summary of the citizen participation process utilized in the development of the five-year Consolidated Plan and this FY 19-20 AAP and commensurate needs identified through the process is found in Appendix A: Citizen Participation Summary. Below is a summary of the outreach efforts:

- 1. Regional and Community Forums: A total of 11 regional and community forums took place to include a forum in the city of Gilroy. In total, the forums were attended by 209 individuals representing a cross-sector of the community. This effort included the distribution of 1,225 hardcopy surveys and eight multi-lingual display ads in the local media. Regional Needs Survey: 4,847 entities were directly engaged via email and survey links were posted on the entitlement jurisdiction's websites. Outreach was also made via Facebook and Twitter. These efforts resulted in the return of 1,472 survey responses.
- 2. In addition, City staff presented a series of priorities for both public service and community development activities identified through the citizen participation process to the Gilroy City Council on February 4, 2019 for CDBG priorities and March 4, 2019 for HTF priorities. The public was invited to offer comments at those meetings which were noticed in the Gilroy Dispatch as Public Hearings. At the March 4, 2019 Council hearing one member of the public addressed the Council representing Gilroy Compassion Center and spoke to the need to address sheltering for persons who are homeless considering that winter shelters had closed for the season on that date.

The City utilized these outreach efforts to formulate the goals it wishes to achieve over the 5-year Consolidated Plan period to include in this FY 19-20 AAP.

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)
			Public Hearing took			
			place at the February			
			4, 2019 City Council			
		Non-	meeting to discuss	Comments were		
1	Public Hearing	targeted/broad	two-year priorities	received at the	N/A	
		community	for use of public	public meeting		
			service and			
			community			
			development.			
			Three regular public			
			meetings and one			
			special meetings of			
			the CNRC took place			
			to discuss public	Comments were		
		Non-	service and housing	received, including		
2	Public Meeting	targeted/broad	rehabilitation funding	presentations by	N/A	
		community	proposals submitted	non-profit		
			in response to a	applicants.		
			Request for Proposal			
			for use of CDBG and			
			local Housing Trust			
			Fund dollars.			

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)
			A public hearing was			
			scheduled for April			
			15, 2019 at the City			
		Non-	Council meeting,			
3	Public Hearing	targeted/broad	however, was	None	N/A	
		community	continued until May			
			6th for further			
			discussion. See item			
			4 below.			
			A public hearing took			
			place at the May 6,			
			2019 City Council			
			meeting to discuss			
			the draft AAP and the			
		Non-	recommended CDBG	No some some succession	N/A	
4	Public Hearing	targeted/broad	and HTF funding for	No comments were		
		community	the first year of the	received.		
			two-year budget			
			cycle around public			
			service and housing			
			rehabilitation			
			activities.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The City expects to receive resources from both the federally funded Community Development Block Grant (CDBG) program as well as the locally funded Housing Trust Fund. Below is a summary of the expected resources in FY 19-20. If HUD makes any adjustments to its allocation after this AAP is adopted, the City will revise the funding amounts for each program, project and public service activity on an across-the-board contingency percentage basis upon formal notice from HUD of the approved FY 19-20 CDBG grant amount.

Anticipated Resources

Program	Source	Uses of Funds	Exped	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan	
							\$	
CDBG	public -	Acquisition						5th year of con plan allocation and Program
	federal	Admin and						Income. Substantial amendment will commit
		Planning						prior year resources to new infrastructure
		Economic						project.
		Development						
		Housing						
		Public						
		Improvements						
		Public Services	476,592	30,000	366,957	873,549	0	

Program	Source	Uses of Funds	Exped	ted Amoun	t Available Ye	ar 1	Expected	Narrative Description
	of Funds		Annual	Program	Prior Year	Total:	Amount	
			Allocation:	Income:	Resources:	\$	Available	
			\$	\$	\$		Remainder	
							of ConPlan \$	
Housing	public -	Housing						The city manages a local Housing Trust Fund.
Trust	local							Funds are generated from the repayment or
Fund								refinancing of prior homebuyer loans that
								were made to low-income homebuyers.
								Funds are also generated from city-owned
								property that were supported with Housing
			168,000	0	0	168,000	168,000	Trust Fund dollars.

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 use of local Housing Trust Fund dollars will assist the city in meeting many of the goals noted in its five-year strategic plan. Funds will go primarily toward housing related public service programs and to assist in the administration of both funds.

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

The city currently owns a multi-family apartment complex within the downtown area known as the Cherry Blossom Apartments. The property includes 7 residential units (five one-bedroom units and two two-bedroom units). The City is currently partnering with the County of Santa Clara and a local nonprofit to house two individuals in the complex. This pilot project currently provides rental subsidies from the County and intensive case management and other support services from the local nonprofit in order to assist the individuals in improving their health and increasing their stability. The program will serve homeless individuals who have been involved in the criminal justice system and require the supportive services necessary to become productive citizens of the community. The City and County will explore the potential of expanding the program to house more individuals to include the provision of supportive services.

Discussion

See above.

Annual Goals and Objectives

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

Goals Summary Information

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
1	Housing	2015	2019	Non-Housing	CITY OF GILROY	Housing Services	CDBG:	Homeowner Housing
	rehabilitation			Community	NEIGHBORHOOD		\$144,364	Rehabilitated: 22 Household
				Development	REVITALIZATION		Housing	Housing Unit
					STRATEGY		Trust Fund:	
							\$0	
2	Services to the	2015	2019	Homeless		Basic Needs	CDBG:	Public service activities other than
	homeless					Supportive	\$16,318	Low/Moderate Income Housing
						Services	Housing	Benefit: 509 Persons Assisted
							Trust Fund:	
							\$58,800	
3	Emergency	2015	2019	Homeless		Housing Services	CDBG: \$0	Homelessness Prevention: 100
	rental assistance						Housing	Persons Assisted
							Trust Fund:	
							\$50,000	
4	Support basic	2015	2019	Homeless		Basic Needs	Housing	Public service activities other than
	need services			Non-Homeless			Trust Fund:	Low/Moderate Income Housing
				Special Needs			\$20,000	Benefit: 16 Persons Assisted
5	Support for	2015	2019	Homeless		Supportive	CDBG:	Public service activities other than
	supportive			Non-Homeless		Services	\$21,173	Low/Moderate Income Housing
	services			Special Needs			Housing	Benefit: 250 Persons Assisted
							Trust Fund:	
							\$25,000	

Sort	Goal Name	Start	End	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
Order		Year	Year					
6	Support youth	2015	2019	Youth		Youth Services	CDBG:	Public service activities other than
	services						\$38,497	Low/Moderate Income Housing
							Housing	Benefit: 140 Persons Assisted
							Trust Fund:	
							\$0	
7	Code	2015	2019	Code	CITY OF GILROY	Housing Services	CDBG:	Housing Code
	Enforcement			Enforcement	NEIGHBORHOOD		\$7,700	Enforcement/Foreclosed Property
	services				REVITALIZATION			Care: 20 Household Housing Unit
					STRATEGY			
8	Capital	2015	2019	Non-Housing	CITY OF GILROY	Infrastructure	CDBG:	Public Facility or Infrastructure
	improvements			Community	NEIGHBORHOOD	Improvements in	\$544,229	Activities other than
	in the NRSA			Development	REVITALIZATION	the NRSA	Housing	Low/Moderate Income Housing
					STRATEGY		Trust Fund:	Benefit: 1 Persons Assisted
							\$0	
9	Promote fair	2015	2020	Fair Housing		Housing Services	CDBG: \$0	Public service activities other than
	housing choice						Housing	Low/Moderate Income Housing
							Trust Fund:	Benefit: 38 Persons Assisted
							\$14,200	

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing rehabilitation
	Goal Description	The city will provide support for a Home Access Program (HAP). This program will provide grants to complete accessibility improvements to low income residents of the Gilroy. Improvements may include wheelchair ramps, chair lifts and roll in showers. They city will also provide funds to support larger scale housing rehabilitation projects. These improvements may include roof replacements, water heater replacements and kitchen improvements. Funds for the larger scale housing rehabilitation program will be targeted to residents who live within the boundaries of the NRSA. All projects will be geared to providing safe and sanitary housing for the impacted individuals. The city will also include funds for the administration of the projects.
2	Goal Name	Services to the homeless
	Goal Description	The city will provide services that support homeless individuals with either shelter or meeting their basic needs such as clothing, food or toiletries. Specifically, the Gilroy Compassion Center will provide drop-in access to basic needs including bathroom, personal care items, laundry facilities, clean clothes, supplies for daily living and respite from living on the streets.
3	Goal Name	Emergency rental assistance
	Goal Description	The city will support efforts to provide emergency rental assistance to either help families threatened with eviction or help homeless families with emergency rental assistance that will allow them to move into permanent housing. Specifically, St. Joseph's Family Center will assist low-income residents with emergency rental assistance to prevent evictions or help unhoused families secure permanent housing.
4	Goal Name	Support basic need services
	Goal Description	The city will continue to support services that provide basic need services especially to special needs clients such as seniors, the disabled and victims of domestic violence. Specifically, Live Oak Adult Day Services will provide adult day care for frail, dependent low-income seniors to include daily activities, nutritious meals and assistance with personal needs.

5	Goal Name	Support for supportive services
	Goal Description	The city will support efforts to provide supportive services to individuals. The individuals may include special needs populations such as the disables, seniors and victims of domestic violence. Specifically, Silicon Independent Living Center will provide extremely-low income residents with disabilities and their families with housing search assistance for affordable and accessible housing. Also, the YMCA Silicon Valley Branch will provide an exercise program to seniors at the Gilroy Senior Center. Finally, Community Solutions will provide emergency shelter and supportive services to individuals and their children who have been victims of domestic violence.
6	Goal Name	Support youth services
	Goal Description	The city will support services at the Gilroy Youth Center to include educational and recreational/enrichment activities. It will also provide funding for free swim lessons and lifeguard training for low income youth.
7 Goal Name Code Enforcement services		Code Enforcement services
	Goal Description	
8 Goal Name Capital improvements in the NRSA		Capital improvements in the NRSA
	Goal Description	The city will provide capital improvements to public facilities within the NRSA. Projects can include sidewalk improvements, lighting modifications or public safety infrastructure improvements.
9	Goal Name	Promote fair housing choice
	Goal Description	The city will support services that address illegal housing discrimination. Services will include investigation of complaints, conducting of outreach and education and litigation or conciliation efforts to victims of illegal housing discrimination. Specifically, Project Sentinel will provide services to address the incidence of illegal housing discrimination by investigating complaints, administering systemic audits, conducting community outreach and education and seeking regress for victims of housing discrimination.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The City will continue to fund various projects that help address the priority needs identified in the five-year Consolidated Plan. The listed projects will require City Council approval prior to the award and release of funds. After Council approval of the revised FY 19-20 AAP, the City will submit its Plan to HUD for review and approval.

The FY19-20 AAP will include the following programs:

#	Project Name
1	Long Term Care Ombudsman
2	Homeless Prevention and Safety Net Services
3	Housing and Emergency Services for Persons with Disabilities
4	Gilroy Street Team
5	Adult Day Care Gilroy
6	Day Center for the Homeless
7	Project Sentinel Fair Housing
8	Meals on Wheels
9	Rebuilding Home Repair, Rehabilitation and Accessibility Modification Program
10	Aquatics Program
11	Gilroy Youth Center
12	Code Enforcement
13	Program Administration
	Sidewalk Gap Closure and Curb Ramp Improvement Project (Added with Substantial Amendment
14	#1)

Table 7 - Project Information

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

Funding of most public services programs was based on a competitive process that involved a Request for Proposals. Interested applicants submitting funding requests based on the targeted priorities developed by the City. Proposals were then reviewed by the City's Community and Neighborhood Revitalization Committee (CNRC), interviews took place of each applicant and based on both the interview and application, the CNRC scored each applicant. Funds were distributed based on the applicants meeting the stated priorities and funding availability. The main obstacle to this process was the limited federal and local funding. However, the City, with the assistance of the CNRC, made strategic investments and funded projects that could make the greatest impact to the ongoing needs of the community utilizing available CDBG and HTF revenue.

AP-38 Project Summary

Project Summary Information

1 Project Name Long Term Care Ombudsman		Long Term Care Ombudsman
		Long Term care offibadaman
	Target Area	
	Goals Supported	Support basic need services Support for supportive services
	Needs Addressed	Basic Needs
	Funding	CDBG: \$9,624
	Description	Catholic Charities will advocate for the rights of residents of long term care facilities.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 150 unduplicated residents of licensed Gilroy long term care facilities.
	Location Description	6 licensed nursing homes and assisted living facilities in Gilroy.
	Planned Activities	The program will provide advocacy on behalf of residents to ensure they are well cared for and basic needs are met.
2	Project Name	Homeless Prevention and Safety Net Services
	Target Area	
	Goals Supported	Emergency rental assistance
	Needs Addressed	Basic Needs Supportive Services
	Funding	Housing Trust Fund: \$50,000
	Description	St. Joseph's Family Center will assist low-income residents by dedicating a case manager/housing specialist to assist families with emergency rental assistance, benefit screenings, housing search, linkages to community resources, financial assistance to maintain or secure permanent housing, and other comprehensive support services that will prevent families from becoming homeless.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide services to 100 unduplicated participants of which some will include familial units.

Location Description The program will provide services at the St. Joseph Fallocated at:		The program will provide services at the St. Joseph Family Services office located at:	
		7950 Church Street, Suite A	
		Gilroy, CA 95020	
	Planned Activities	The program will provide emergency rental assistance and assessments of service needs.	
3	Project Name	Housing and Emergency Services for Persons with Disabilities	
	Target Area		
	Goals Supported	Support for supportive services	
	Needs Addressed	Supportive Services Housing Services	
	Funding	Housing Trust Fund: \$25,000	
	Description	The Silicon Valley Independent Living Center will assist individuals with disabilities and their families in their housing search for affordable and accessible housing.	
	Target Date	6/30/2020	
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 60 unduplicated participants	
	Location Description	The program will provide services at Silicon Valley Independent Living Center offices located at:	
		7881 Church Street, Suite C	
		Gilroy, CA 95020	
	Planned Activities	The program will provide assistance for individuals with disabilities and their families to transition from homelessness, health care facilities, unstable or temporary housing to permanent affordable, accessible, integrated housing and emergency assistance, security deposits, rent, information and referral, providing other assistance as to ensure long-term sustainability of the independent living solutions.	
4	Project Name	Gilroy Street Team	
	Target Area		
	Goals Supported	Services to the homeless Support for supportive services	
	İ	1	

	Needs Addressed	Basic Needs Supportive Services
	Funding	Housing Trust Fund: \$35,000
	Description	St. Josephs Family Center Gilroy Street Team program will prepare homeless, un-housed and at-risk individuals for regular employment.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 9 unduplicated participants
	Location Description	7950 Church Street, Suite A, Gilroy, CA 95020
	Planned Activities	Participants will provide clean-up and beautification services, focusing on areas of blight, main street thoroughfares, graffiti abatement, assist local code enforcement and Santa Clara Valley Water District with encampment clean-ups, non-profit events and community based service projects.
5	Project Name	Adult Day Care Gilroy
	Target Area	
	Goals Supported	Support basic need services Support for supportive services
	Needs Addressed	Basic Needs Supportive Services
	Funding	CDBG: \$11,549
	Description	Live Oak Adult Day Care Services
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide services to 40 seniors.
	Location Description	The program will provide services at:
		651 W. Sixth Street, Suite 2
		Gilroy, CA 95020

socialization, rec meals, removing environment, an services which w		The program will provide disabled, at-risk Gilroy seniors with socialization, recreation, exercise, mental stimulation and nutritious meals, removing them from isolation into a life-enhancing and protected environment, and to provide family caregivers with respite and support services which will enhance their ability to care for their senior loved one in the home setting.
6	Project Name	Day Center for the Homeless
	Target Area	
	Goals Supported	Services to the homeless Support basic need services
	Needs Addressed	Basic Needs
	Funding	CDBG: \$16,318 Housing Trust Fund: \$23,800
Description The Day Center provides drop-in access to basic needs, including		The Day Center provides drop-in access to basic needs, including bathrooms, personal care items, laundry, clean clothes, etc. and a one-stop location for resources and referrals.
	Target Date	6/30/2020
Estimate the number and type of families that will benefit from the proposed activities The program will service 500 homeless individuals in the program will service 500 homeless in the program will be program will be program will service 500 homeless in the program will be program will be progr		The program will service 500 homeless individuals
Location Description The program will provide services at the Compassion Center located at:		The program will provide services at the Compassion Center currently located at:
		370 Tomkins Ct.
Gilroy, CA 95020		Gilroy, CA 95020
	Planned Activities	The program will provide basic needs such as food, clothing, and hygiene to the homeless, as well as connections to services to increase functioning and self-sufficiency, such as a mailing, address, phones, referrals, case management, and service opportunities. It will also provide case management and outreach services.
7	Project Name	Project Sentinel Fair Housing
	Target Area	
	Goals Supported	Promote fair housing choice
	Needs Addressed	Housing Services
	Funding	Housing Trust Fund: \$14,200

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	Description	Project Sentinel will provide services to address the incidence of illegal housing discrimination by investigating complaints, administering systemic audits, conducting community outreach and education and seeking redress for victims of such discrimination.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	38 unduplicated participants.
	Location Description	8339 Church Street, Ste. 104
		Gilroy, CA 95020
	Planned Activities	The program will provide Fair Housing services, which include community outreach and education and the investigation of complaints and audits for unreported violations. These services are designed to address the incidence of illegal housing and provide redress to victims of such discrimination. These services help ensure balanced, integrated communities and meet HUD requirements for affirmatively furthering fair housing.
8	Project Name	Meals on Wheels
	Target Area	
	Goals Supported	Support basic need services Support for supportive services
	Needs Addressed	Basic Needs Supportive Services
	Funding	Housing Trust Fund: \$20,000
	Description	The Health Trust will deliver 2,250 home-delivered meals and 1,460 social visits and wellness checks.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	16 unduplicated participants
	Location Description	Services will take place at various residences within the City of Gilroy city limits.

	Planned Activities	Daily, hot, home-delivered meals will be delivered to the homes of low-income home bound Gilroy residents to include wellness checks with each delivery.
9	Project Name	Rebuilding Home Repair, Rehabilitation and Accessibility Modification Program
	Target Area	
	Goals Supported	Housing rehabilitation
	Needs Addressed	Housing Services
	Funding	CDBG: \$144,364
	Description	The project will repair housing units to attend to the immediate health and safety needs of eligible low-income homeowners with an emphasis on eligible low-income homeowners living in the Neighborhood Revitalization Strategy Area (NRSA).
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will serve 22 unduplicated households.
	Location Description	Services will take place at various residences within the City of Gilroy
	Planned Activities	The project will focus on the correction of safety hazards and urgent repairs that will attend to the immediate health and safety needs of the household. It will also provide urgent/critical repairs and/or accessibility improvements to ensure safe, affordable and a decent living environment for the occupants.
10	Project Name	Aquatics Program
	Target Area	
	Goals Supported	Support youth services
	Needs Addressed	Youth Services
	Funding	CDBG: \$2,000
	Description	Free swim lessons for low income youth.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	The program will provide free swim lessons to 55 youth ages 5-12.
	Location Description	The program will provide services at Christopher High School Aquatics Center located:
		850 Day Road Gilroy, CA 95020
Planned Activities The program will program to be water safe swim lesson curricult		The program will provide free swim lessons to children ages 5 to 12 to learn to be water safe. Swim lessons will follow the American Red Cross swim lesson curriculum and instructors are certified Lifeguards and Water Safety Instructors.
11	Project Name	Gilroy Youth Center
	Target Area	
	Goals Supported	Support youth services
	Needs Addressed	Youth Services
	Funding	CDBG: \$36,497
	Description	Gilroy youth center services
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide services to 85 youth ages 6-14.
	Location Description	The program will provide services at the Gilroy Youth Center located at:
		Cesar E. Chavez Gym
		227 IOOF Ave.
		Gilroy, CA 95020
	Planned Activities	During the school year, the Youth Center is an after-school program providing homework assistance, arts & crafts, sports, and games. During the summer, the Youth Center operates as a summer day camp with sports, games, arts & crafts and fun themed based activities. Registration is required for each component.
12	Project Name	Code Enforcement

	Target Area	CITY OF GILROY NEIGHBORHOOD REVITALIZATION STRATEGY
	Goals Supported	Code Enforcement services
	Needs Addressed	Housing Services
	Funding	CDBG: \$7,700
	Description	Code Enforcement services in NRSA
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The program will assist 20 households
	Location Description	The program will provide code enforcement services within the NRSA
	Planned Activities	This program will provide code enforcement services within the NRSA to enable 20 low- and moderate-income households to retain decent, affordable housing.
13	Project Name	Program Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: \$101,318
	Description	Program Administration of the CDBG Program - including staff time and oversight
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Management of the CDBG program will take place at Gilroy City Hall located at:
		7351 Rosanna St.
		Gilroy, CA 95020
	Planned Activities	The program will provide oversight and monitoring of the CDBG and HTF programs.
14	Project Name	Sidewalk Gap Closure and Curb Ramp Improvement Project

Target Area	
Goals Supported	Capital improvements in the NRSA
Needs Addressed	Infrastructure Improvements in the NRSA
Funding	CDBG: \$544,229
Description	Proposed project will install new sidewalk and ADA curb ramps where such facilities do not exist, thus offering safe paths of travel for pedestrians.
Target Date	6/30/2020
Estimate the number and type of families that will benefit from the proposed activities	TBD
Location Description	Project locations include: Martin Street, Chestnut Street, Alexander Street, E 9 th Street, W 8 th Street and Murray Avenue
Planned Activities	Proposed project will install new sidewalk and ADA curb ramps where such facilities do not exist, thus offering safe paths of travel for pedestrians.

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 will continue to utilize both CDBG and Housing Trust Fund funding to support citywide efforts that meet the needs of the community. However, it will continue to make strategic investments within the boundaries of its Neighborhood Revitalization Strategy Area (NRSA) as approved by HUD. The NRSA is an area of both low-income and minority concentration and in need of a higher level investments to meet the needs of the community.

Geographic Distribution

Target Area	Percentage of Funds
CITY OF GILROY NEIGHBORHOOD REVITALIZATION STRATEGY	63

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Based on the Choice Neighborhoods 2013 Mapping Tool provided by HUD, 30.77% of households within the NRSA are in poverty or have extremely low incomes (30% of county median income). The vacancy rate for this area is 7.02 % as compared to the surrounding county rate of 4.6%. Further research showed that HUD has identified the three combined tracts as "Qualified Census Tracts" (QCTs) for Low Income Housing Tax Credits. To meet this designation a tract must have either a poverty rate of at least 25% or 50% or more of its householders must have incomes below 60% of the county median income. The same area is currently considered by the Small Business Administration to be a "Historically Underutilized Business Zone" (HUB Zone). Small businesses in such a zone have certain preferences in obtaining federal contracts.

Further, a considerable number of homeless persons are found in the NRSA and most of Gilroy's providers of homeless services are located within the boundaries. Also, the NSRA census tract has recently been identified as a potential Opportunity Zone private investment incentive program. This program is expected to be adopted in the new federal budget for FY 19-20 and associated federal tax reform legislation passed by Congress and signed by the President by September 30, 2019. The program will be administered by U.S. Treasury Department with program rules projected to become available in 2019. The program will allow private companies to invest in community and job creation activities within the Gilroy Opportunity Zone and in exchange receive a federal tax credit.

Discussion

See above

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

There are no specific actions proposed to ameliorate the negative effects of public policies that serve as barriers to affordable housing. The city will continue to enforce the Residential Development Ordinance (RDO) Affordable Housing Exemption Procedure (Procedure). The intent of the Procedure is to set forth specific criteria and guidelines for the affordable housing exemptions included in the city of Gilroy Zoning Ordinance. The goal of the Procedure is to meet the current and future needs of all segments of the community specifically both for-sale and rental housing to low income individuals. The city, through the implementation of its Housing Element, will continue to identify opportunities to promote the development of affordable housing where possible.

Discussion

See above

Annual Action Plan 2019

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

Introduction

The Annual Action Plan has highlighted many of the specific actions the city plans to take in Fiscal Year 2019-2020. Below is further information on other actions it plans to undertake during the same timeframe.

Actions planned to address obstacles to meeting underserved needs

As noted prior, the most significant obstacle in meeting underserved needs is the limited availability of funding. The city will continue to research potential opportunities for additional sources of funding to address the needs it is unable to address with the funds available. When funds become available, the city will research the potential uses of those funds and make a determination as to whether or not it can be used to address underserved needs. Such efforts will be addressed when the city reports out its accomplishments through the CAPER.

Actions planned to foster and maintain affordable housing

The City will continue to support and provide technical assistance to developers of affordable for-sale and rental housing. It will continue to research and evaluate options that could provide additional financial support the development of affordable housing.

Actions planned to reduce lead-based paint hazards

The city will continue to educate to the community regarding the hazards of lead poisoning, particularly with regard to lead-based paint hazards. It will maintain information on the dangers of lead based paint at the Community Development calendar. It will provide handouts to rehabilitation program clients and test for lead-based paint as required. Finally, it will continue to implement the local Lead Based Management Plan and update when necessary.

Actions planned to reduce the number of poverty-level families

The city expects that through the community services funding both through the CDBG and Housing Trust Fund programs will reduce the number of poverty-level families.

Actions planned to develop institutional structure

City staff and staff from the other CDBG entitlement cities in the County of Santa Clara and the County of Santa Clara as well as the Housing Authority of Santa Clara County participate in quarterly CDBG Coordinators meetings. These meetings discuss data resources and strive to coordinate requests for information to both public and private countywide agencies. These meetings help City staff to better

understand the County and non-profit social service structure. Additionally, HUD staff meets with this group to clarify issues and assist in providing ongoing programmatic technical information. The email list serve for this group enables members to share information and to provide technical assistance to one another. The quarterly meetings promote and create an environment of cooperation and understanding of differing needs, concerns, and issues among the group. This expansion of knowledge of regional issues and sharing of information benefits each of the individual jurisdictions represented in the group.

Also, City staff participates in the South County Collaborative that consists of providers of services to low income and special needs residents of Gilroy, San Martin and Morgan Hill. The Collaborative is a nonprofit organization, which is able to apply for funding that benefits the communities it serves. Collaborative members share information through an active list serve and receive notices of public comment periods on the AAPs and CAPERs.

Lastly, the City's Police Department hosts a monthly meeting that includes representatives from County Mental Health, staff from various nonprofit agencies, health workers, the Santa Clara Valley Water District, faith-based organizations, as well as individual volunteers. The focus is on identifying resources and on sharing information on homeless individuals that have been identified by the police and outreach workers as being ready to get off the streets or who are in particularly dire need. The sharing of information and resources also has as a goal of conserving resources such as police time spent in rearresting the same homeless person multiple times. The group is also considering viable alternatives to illegal encampments in Gilroy.

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

As noted in the "Actions planned to develop institutional structure" the city actively participates in various groups and collaborative designed to share information, bring awareness to the needs and services of the community and organized to design solutions to the many needs in the community. The city will continue to participate in such efforts with the goal of bringing forth additional resources to city residents.

Discussion

See above

Program Specific Requirements

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

Introduction

The city will continue to collect additional revenue to support the actions noted in the Annual Action Plan. The funds, known as Program Income, is collected from various sources to include repayment of past rehabilitation loans, rents from city-owned properties that were improved with CDBG and Housing Trust Fund funds and bank interest.

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	30,000
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:	30,000

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.

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See above