



2021 Annual Action Plan
DRAFT

Norwalk Redevelopment Agency
3 Belden Avenue
Norwalk, CT 06850

Annual Action Plan
2021

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The Norwalk, CT PY 2021 Annual Action Plan (PY 2021 AAP) is required each year by the U.S. Department of Housing and Urban Development (HUD) for the City to receive federal Community Development Block Grant (CDBG) funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income persons.

Annually, the City develops its AAP in which it will describe the planned investment of these federal resources to implement specific activities. This AAP is the second year of the 5-Year Consolidated Plan (Con Plan) for the City's CDBG program.

In PY 2021, the City of Norwalk anticipates receiving \$884,474 for CDBG, and other funding and resources that will help facilitate the execution of the plan's strategies and activities. Assuming the same allocation for each of the three remaining years in the Con Plan, the City will receive \$2,653,422 in additional CDBG funding for the remainder of the Con Plan.

2. Summarize the objectives and outcomes identified in the Plan

The City of Norwalk has developed its strategic plan based on an analysis of the data presented in the 5-Year Con Plan and an extensive community participation and consultation process. Through these efforts, the City has identified four priority needs with associated goals to address those needs. The priority needs with associated goals include:

Priority Need: Increase high quality and affordable housing

- Residential rehabilitation

Priority Need: Modernize public facilities and infrastructure

- Public facility rehabilitation
- Improve public infrastructure: modern & safe

Priority Need: Increase in available social services

- Basic services
- Health & mental health services
- Employment training
- Housing services

Priority Need: Expand economic opportunities

- Economic development: technical assistance

In PY 2021, the City will focus on priority needs Modernize public facilities and infrastructure and Increase in available social services. For more details, please refer to AP-20 for a summary of goals, objectives, and outcomes in the AAP.

3. Evaluation of past performance

The City, with other public, private and non-profit community housing providers and non-housing service agencies have made significant contributions to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low to moderate income individuals in the community. However, improvements to public facilities and infrastructure, vital public services for LMI, and affordable housing remain some of the most prolific needs facing Norwalk, as documented by the current Consolidated Plan and the 2019 Consolidated Annual Performance and Evaluation Report (CAPER).

The summary of past performance reported below was taken from the City’s most recently completed CAPER completed for PY 2019:

Affordable Housing: The City assisted 4 single-unit and 28 multi residential units for low- and moderate-income (LMI) households with housing rehab in its CDBG Housing Rehab Program. There were also 583 persons who were assisted through emergency financial assistance to avoid utility shut-off, security deposits to obtain suitable housing and eviction. Through code enforcement activities the City assisted 100 households with inspections, and bringing the property into compliance. Other than owner-occupied housing rehab, the City was largely successful with all housing projects. The City’s rehab program continues to identify more households with this need and anticipates meeting its goals in upcoming program years.

Public Facilities and Infrastructure Improvements: The City made improvements to neighborhood facilities that had an areawide benefit to 10,769 persons in LMI areas. There was an areawide benefit of 5,005 who were assisted with facility modernization activities through improvements to public parks and rec facilities at the locations of Ryan Park, Freese Park and Klondike Park. Community cleanup of a contaminated site within the City Neighborhoods area had an areawide benefit to 2,985 persons for the purpose of developing a public park. The City met or exceeded most of its goals for this project.

Public Services: The City supported public services that improved the quality of life of residents. Basic services for the elderly and youth programs benefitted 1,214 LMI persons. For the elderly, assistance was provided by Senior Services Coordinating Council. Services for youth included enrichment and education and were provided by the East Norwalk Library Association, Higher Ed Literacy Professionals, Saturday Academy, and the SAVE Check and Connect program. Mental health services benefitted 500 LMI persons

and services were provided by the Child Guidance Center and the Domestic Violence Crisis Center. The City met or exceeded most of its goals for public services.

Economic Development: There were 35 LMI persons that benefitted from employment training services at the Open Door Shelter Jobs Program located at the new Smilow Life Center. The job training program provides job skills training, coaching and job placement for homeless individuals and youth living in poverty. The City did not meet its goals for job training and will revise this goal.

4. Summary of Citizen Participation Process and consultation process

Full details of the City’s citizen participation outreach efforts are available in AP-12 Citizen Participation.

5. Summary of public comments

Full details of the City’s citizen participation outreach efforts are available in AP-12 Citizen Participation.

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

All comments and views were accepted. Comments outside the scope of the plan were not addressed.

7. Summary

In summary, the PY 2021 Annual Action Plan has been developed with community input and reflect the needs of the City.

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

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

Describe the agency/entity 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 | NORWALK | Norwalk Redevelopment Agency |

Table 1 – Responsible Agencies

Narrative (optional)

The City of Norwalk has designated the Norwalk Redevelopment Agency (Agency) as the administrator and sole sub-recipient of Norwalk’s annual entitlement of Community Development Block Grant (CDBG) funds. The Agency has a mission to improve the physical economic and social environment of the Norwalk Community by serving as the primary governmental organization dedicated to promoting commercial development, to preserving and improving the City’s housing stock and to securing and administering the resources required to carry out these goals. As administrator of the CDBG program, the Agency is responsible for overall program management, coordination, monitoring, reporting and evaluation.

The Agency is responsible for the implementation of the City’s urban renewal/redevelopment and economic activities; for ensuring all program activities are carried out in a timely manner consistent with grant conditions, State and Federal regulations; for acting as contact between the CDBG program and other City Departments, Federal and State agencies and the general public; for seeking out and applying for other funding sources to help leverage funds; for monitoring all activities for timely implementation; for preparing certificates of consistency for Norwalk social service providers; for compiling and submitting grant reports; for supervising personnel; for initiating and obtaining approvals for program and budget amendments; for processing payment request; and for ensuring that appropriate program and financial records are maintained. The Agency works with the Mayor and Common Council for appropriate program approval, as stated in the Citizen Participation Plan.

Consolidated Plan Public Contact Information

Norwalk Redevelopment Agency
3 Belden Avenue
Norwalk, CT 06850
bbidolli@norwalkct.org
(203)854-7810

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

1. Introduction

The City of Norwalk developed an outreach effort to maximize input from a large cross-section of stakeholders. The outreach effort included public meetings, stakeholder meetings, published meeting notices, and a web survey conducted in both English and Spanish.

Several housing, social service agencies, and other organizations serving the City of Norwalk were consulted during the development of this plan. Participants included affordable housing providers, neighborhood organizations, homeless and social service providers, and city staff members

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 City of Norwalk developed an outreach effort to maximize input from a large cross-section of stakeholders. The outreach effort included public meetings, stakeholder meetings, published meeting notices, and a web survey conducted in both English and Spanish.

Several housing, social service agencies, and other organizations serving the City of Norwalk were consulted during the development of this plan. Participants included affordable housing providers, neighborhood organizations, homeless and social service providers, and city staff members.

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 City of Norwalk continues to commit significant resources to the planning and implementation of efforts to prevent and end homelessness. The Norwalk/Fairfield County Continuum of Care (CoC), known as the Opening Doors Fairfield County (ODFC) serves the communities of Norwalk, Weston, Wilton, Westport, Darien, Brookfield, Redding, Ridgefield, Sherman Newtown and New Canaan.

Based on a Collective Impact Model, ODFC uses the goals and objectives set forth by the Federal Opening Doors strategic plan as a common agenda that embodies five major themes:

- 1) Increased leadership, collaboration, and civic engagement;
- 2) Increased access to stable and affordable housing;
- 3) Increase economic security;
- 4) Improved health and housing stability; and
- 5) Retool the homeless crisis response system.

Shared metrics established by federal legislation are in place to measure ODFC's success and includes the reduction in length and time people are homeless; rate at which people return to homelessness; reduction in first time homelessness; and overall reduction of people who are homeless. ODFC is structured by a governing body of experts and key cross-sector participants who directly and indirectly work with this population.

The efforts of ODFC are embedded in the working committees supported by dedicated staff from two agencies that keep members on tasks and committee's work plans on schedule. Referred to as the "Backbone Organizations." Supportive Housing Works and the Connecticut Coalition to End Homelessness strategically partner to provide ongoing facilitation, technology and communication support required for a working collaboration.

ODFC uses the goals and objectives set for by Opening Doors – CT, in alignment with the federal Opening Doors plan, to guide its work. These goals are:

- Finish the job of ending chronic homelessness by 2020
- Prevent and end homelessness among families, youth and children by 2020
- Set a path to ending all types of homelessness

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 Norwalk/Fairfield County Continuum of Care (CoC) works with the Connecticut Department of Housing (DOH) to ensure alignment between the CoC's strategic goals and the uses of Emergency Shelter Grants (ESG). Homeless housing assistance and service providers within the Norwalk/Fairfield County CoC are eligible to submit competitive grant applications to the State of ESG. None of the jurisdictions in the Norwalk/Fairfield County CoC are ESG entitlement communities. Stakeholders feel that Norwalk/Fairfield County CoC is not directly consulted by the State on how ESG should be allocated or distributed. The CoC is working to increase coordination with the DOH by acting as a quality control agent when an agency within the Norwalk/Fairfield County CoC receives ESG from the State. In this role the CoC collects project performance reports and ensures the project maintains compliance with ESG requirements. Furthermore, the DOH has attended Norwalk/Fairfield County CoC Meetings.

The Norwalk/Fairfield County CoC has designated the Connecticut Coalition to End Homelessness (CCEH) as the lead homeless management information systems (HMIS) organization. The CoC has an HMIS Policy and Procedures Manual which requires the lead organization to input data accurately and in a timely manner.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|--|
| 1 | Agency/Group/Organization | NORWALK REDEVELOPMENT AGENCY |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Economic Development Market Analysis |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 2 | Agency/Group/Organization | Norwalk Housing Authority |
| | Agency/Group/Organization Type | PHA |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Public Housing Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 3 | Agency/Group/Organization | St. Vincent's Behavioral Health Services |
| | Agency/Group/Organization Type | Services-Health |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 4 | Agency/Group/Organization | HUMAN SERVICES COUNCIL, INC. |
| | Agency/Group/Organization Type | Services - Housing Services-Health Services-Education Services-Employment |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Economic Development Market Analysis |

| | | |
|---|--|---|
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 5 | Agency/Group/Organization | Norwalk International Cultural Exchange (NICE INC) |
| | Agency/Group/Organization Type | Services-Education |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 6 | Agency/Group/Organization | Norwalk Public Schools |
| | Agency/Group/Organization Type | Services-Education Other government - Local |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Economic Development |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 7 | Agency/Group/Organization | Norwalk Transit District |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Economic Development |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 8 | Agency/Group/Organization | ODYSSEY FAMILY EXECUTIVE CENTER OF SOUTH NORWALK, INC. |
| | Agency/Group/Organization Type | Services-Education |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs Economic Development Market Analysis |

| | | |
|----|--|--|
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 9 | Agency/Group/Organization | Greater Norwalk Chamber of Commerce |
| | Agency/Group/Organization Type | Business Leaders |
| | What section of the Plan was addressed by Consultation? | Economic Development Market Analysis |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 10 | Agency/Group/Organization | ACTION FOR BRIDGEPORT COMMUNITY DEVELOPMENT |
| | Agency/Group/Organization Type | Regional organization |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs Economic Development |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 11 | Agency/Group/Organization | CT-503 CoC, Opening Doors of Fairfield County |
| | Agency/Group/Organization Type | Services-homeless |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 12 | Agency/Group/Organization | FAMILY & CHILDREN'S AGENCY |
| | Agency/Group/Organization Type | Services-homeless Services-Health Services-Education |

| | | |
|----|--|--|
| | What section of the Plan was addressed by Consultation? | Homelessness Strategy Homeless Needs - Families with children Non-Homeless Special Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 13 | Agency/Group/Organization | Norwalk Health Department |
| | Agency/Group/Organization Type | Services-Health Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Lead-based Paint Strategy Non-Homeless Special Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 14 | Agency/Group/Organization | City of Norwalk - Building & Code Enforcement Department |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Lead-based Paint Strategy |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 15 | Agency/Group/Organization | Riverbrook Regional YMCA |
| | Agency/Group/Organization Type | Services-Health Services-Education |
| | What section of the Plan was addressed by Consultation? | Economic Development Market Analysis |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |

| | | |
|----|--|--|
| 16 | Agency/Group/Organization | NAACP |
| | Agency/Group/Organization Type | Regional organization Civic Leaders |
| | What section of the Plan was addressed by Consultation? | Non-Homeless Special Needs |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |
| 17 | Agency/Group/Organization | CITY OF NORWALK - MAYOR'S OFFICE |
| | Agency/Group/Organization Type | Other government - Local |
| | What section of the Plan was addressed by Consultation? | Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis |
| | How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination? | Attended stakeholder meetings. |

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

All entities were considered for consultation.

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 | Opening Doors Fairfield County | The homelessness strategy was developed in consultation with Opening Doors Fairfield County, the lead agency for the regional CoC. |
| Analysis of Impediments to Fair Housing Choice | Norwalk Redevelopment Agency | Barriers to affordable housing opportunities from the AI were included in the Con Plan. |

Table 3 – Other local / regional / federal planning efforts

Narrative

In accordance with 24 CFR 91.100(4), the City of Norwalk will notify adjacent units of local government of the non-housing community development needs included in its Con Plan. Norwalk will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Con Plan and thereby maximize the benefits of the City’s housing and community development activities for the residents being served.

AP-12 Participation – 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 City of Norwalk is engaged in ongoing efforts to coordinate among its network agencies and nonprofit organizations that deliver housing, community and economic development services to the community. As the administrators of HUD's CDBG program, the City's Norwalk Redevelopment Agency has open lines of communication with the City's many nonprofit and social service agencies, which are also given opportunities to participate in the planning process. These community stakeholders help provide input that shapes the priority needs and strategies to address the needs identified in the City's plan.

Norwalk Redevelopment Agency staff also attempt on an ongoing basis to encourage participation by all citizens with special emphasis on persons of low- to moderate-incomes and those with special needs to participate in the planning process. See below for a summary of details on the City's citizen participation efforts:

Public Comment Period – A draft of the 2021 AAP Plan was placed on electronic display through the City of Norwalk's Website and various locations for 30 days beginning March 26, 2021 to April 25, 2021. The AAP was distributed in hard copy to the Main and South Norwalk branch libraries, the Norwalk Housing Authority, the South Norwalk Community Center and the Norwalk Redevelopment Agency office.

Public Hearing – The Planning Committee held a public hearing on the draft 2021 AAP on April 1, 2021 at 7:00PM to obtain comments on the draft PY2021 AAP Plan.

Other Dates: The Planning Committee will advance the draft 2021 AAP to the Common Council on May 6, 2021 for approval. On May 11, 2021 the Common Council will approve the Mayoral signing of the 2021 AAP for HUD submission.

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 |
|------------|----------------------|--|---|------------------------------|--|
| 1 | Public Review Period | Non-targeted/broad community | A draft of the PY 2021 AAP Plan was placed on electronic display through the City of Norwalk’s Website and various locations for 30 days beginning March 26, 2021 to April 25, 2021. Comments could be sent to the Norwalk Redevelopment Agency office at the contact listed in the PR-05 of this plan. | All comments are accepted. | All comments are accepted. |
| 2 | Public Hearing | Non-targeted/broad community Common Council | The Planning Committee held a public hearing on the draft 2021 AAP on April 1, 2021 at 7:00PM to obtain comments on the draft PY2021 AAP Plan. | All comments are accepted. | All comments are accepted. |

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The following table provides an overview of the City of Norwalk's CDBG allocation for the 2021 program year, the remainder years of the Con Plan, and other funding and resources that will help facilitate the execution of the plan's strategies and activities.

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: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 884,474 | 229,000 | 61,000 | 1,174,474 | 3,340,422 | The Norwalk Redevelopment Agency will use CDBG funds to increase high quality affordable housing, expand economic opportunities, modernize public facilities and infrastructure, and increase available social services to residents of Norwalk. Expected amount available is 3x more years of the annual allocation and program income. |

Table 5 - Expected Resources – Priority Table

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

The City awards a portion of its annual CDBG allocation as grants to local organizations through a competitive process and recommends applicants provide matching funds, \$2/\$1 match for public service programs and a \$1/\$1 match for all other programs. Organizations in receipt of these grants receive support from an array of public and private sources to provide high quality and innovative programming in service of the community. The Norwalk Redevelopment Agency (Agency) works strategically so that federal funds attract additional funding and spur private development to meet the needs of the community.

HUD awarded a \$30 million Choice Neighborhood Implementation grant to the Norwalk Housing Authority and the Agency in 2014. This transformational project will leverage approximately \$120 million dollars from private, federal and state resources, which consists of approximately \$95 million in housing resources, over \$8 million for Critical Community Investments and about \$16.4 million for the delivery of social services. Funding sources for Critical Community Investments include CDBG, private developers, the City of Norwalk’s Capital Budget, the State of Connecticut Departments of Transportation and Housing and the Connecticut Housing Finance Authority. The Choice Neighborhood Initiative project will rebuild the outdated 136-unit Washington Village public housing development into a new 273-unit mixed income preserving and creating additional affordable housing, preserve multi-family housing in the area, and improve Ryan Park, the South Norwalk Community Center, walkability through the Complete Streets initiative, residential façades and public safety. It will position the neighborhood to build a better future for current residents and welcome new households and businesses interested in bringing new vitality to the area.

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|--|-----------------|--|--------------------|--|
| 1 | Public facility rehabilitation | 2020 | 2024 | Homeless Non-Homeless Special Needs | | Modernize public facilities and infrastructure | CDBG: \$392,646 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 40 Households Assisted Homelessness Prevention: 200 Persons Assisted |
| 2 | Improve public infrastructure: modern & safe | 2020 | 2024 | Non-Housing Community Development | | Modernize public facilities and infrastructure | CDBG: \$392,646 | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 5500 Households Assisted |
| 3 | Basic services | 2020 | 2024 | Affordable Housing Public Housing Non-Homeless Special Needs Non-Housing Community Development | | Increase in available social services | CDBG: \$40,813 | Public service activities for Low/Moderate Income Housing Benefit: 1520 Households Assisted Public Services activities for Low/Moderate Income Housing Benefit: 33385 persons |
| 4 | Health & mental health services | 2020 | 2024 | Non-Homeless Special Needs | | Increase in available social services | CDBG: \$81,813 | Public service activities for Low/Moderate Income Housing Benefit: 140 Households Assisted |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|----------------------------|------------|----------|-----------------------------------|-----------------|--|-----------------|--|
| 5 | Employment training | 2020 | 2024 | Non-Housing Community Development | | Increase in available social services | CDBG: \$66,813 | Public service activities for Low/Moderate Income Housing Benefit: 30 Households Assisted |
| 6 | Housing services | 2020 | 2024 | Affordable Housing Public Housing | | Increase in available social services | CDBG: \$101,747 | Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted |
| 7 | Residential rehabilitation | 2020 | 2024 | Affordable Housing | | Increase high quality and affordable housing | CDBG: \$97,993 | Rental units rehabilitated: 15 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | Public facility rehabilitation |
| | Goal Description | Fund public facility improvements that benefit low- and moderate-income households and persons with special needs. Includes senior centers (03A), handicapped centers (03B), homeless facilities (03C), youth centers (03D), neighborhood facilities (03E), parks and recreational facilities (03F), fire stations/equipment (03O), and facilities for HIV/AIDS patients (03S). |
| 2 | Goal Name | Improve public infrastructure: modern & safe |
| | Goal Description | Fund non-housing community development proposals that eliminate threats to public health and safety. Inclusive of flood drainage improvements (03I), water/sewer improvements (03J), street improvements (03K), sidewalks (03L) |
| 3 | Goal Name | Basic services |
| | Goal Description | Basic services include senior services (05A), youth services (05D), and childcare services (05L). |

| | | |
|---|-------------------------|--|
| 4 | Goal Name | Health & mental health services |
| | Goal Description | Health & mental health services include substance abuse services (05F), services for battered and abused spouses (05G), services for abused and neglected children (05N), and mental health services (05O). |
| 5 | Goal Name | Employment training |
| | Goal Description | Assistance to increase self-sufficiency, including literacy, independent living skills, resume writing, job coaching, "how to get and keep a job" training, or training students in a particular field on skill when there is no tie to a specific position or business. CDBG Matrix Code: 05H |
| 6 | Goal Name | Housing services |
| | Goal Description | Housing services include operating costs of homeless and HIV/AIDS patients programs (03T), fair housing activities (05J), subsistence payments (05Q), security deposits (05T), and housing counseling (05U). |
| 7 | Goal Name | Residential rehabilitation |
| | Goal Description | Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs. The goal is inclusive of single- and multi-unit residential rehab CDBG Matrix Codes 14A and 14B, respectively and housing rehab administration (14H) |

Projects

AP-35 Projects – 91.220(d)

Introduction

The following projects were selected to be funded by CDBG for FY 2021.

Projects

| # | Project Name |
|---|--|
| 1 | CDBG: Administration |
| 2 | CDBG: Public Services |
| 3 | CDBG: Public Facilities & Infrastructure |
| 4 | CDBG: Housing Programs |

Table 7 - Project Information

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

The majority of Norwalk's projects, including public service, housing, public facility, and public infrastructure activities, are selected through a competitive process. All CDBG projects and programs funded in 2021 were chosen because they address the high priority needs identified through the Needs Assessment. Projects selected for CDBG funding were prioritized on efficient utilization of non-CDBG funds and ability to serve the largest number of beneficiaries.

AP-38 Project Summary

Project Summary Information

| | | |
|---|--|---|
| 1 | Project Name | CDBG: Administration |
| | Target Area | |
| | Goals Supported | Basic services |
| | Needs Addressed | Increase in available social services |
| | Funding | CDBG: \$222,694 |
| | Description | CDBG funds will be used to cover costs associated with the administration of the City's CDBG Program for the 2021 fiscal year. |
| | Target Date | 6/30/2022 |
| | Estimate the number and type of families that will benefit from the proposed activities | N/A. Admin activities to support CDBG projects. |
| | Location Description | Admin of the CDBG program citywide. |
| | Planned Activities | See description. HUD Matrix Code: 20, 21A, 21C, 21D, 21E |
| 2 | Project Name | CDBG: Public Services |
| | Target Area | |
| | Goals Supported | Basic services Health & mental health services Employment training Housing Services |
| | Needs Addressed | Increase in available social services |
| | Funding | CDBG: \$163,934 |
| | Description | The City will allocate CDBG funds towards basic public services, health and mental health services, employment training and housing services and assist LMI individuals and households. |
| | Target Date | 6/30/2022 |

| | | |
|---|--|---|
| | Estimate the number and type of families that will benefit from the proposed activities | Public Services activities for Low/Moderate Income Housing Benefit: 33,385 persons Public Services activities for Low/Moderate Income Housing Benefit: 1,710 households |
| | Location Description | Public services to eligible persons and households to be provided citywide. |
| | Planned Activities | Planned activities for public services are: East Norwalk Library (HUD Matrix Code: 05D): \$9,000 Malta House Residential and Partnering Success Program (HUD Matrix Code: 05H): \$50,000 Open Door Shelter Employment First Job Placement Program (HUD Matrix Code: 05H): \$35,000 Person to Person - Eviction and utility shutoff prevention (HUD Matrix Code: 05Q): \$32,434 Supportive Housing Works - Rent relief / eviction protection (HUD Matrix Code: 05Q): 37,500 |
| 3 | Project Name | CDBG: Public Facilities & Infrastructure |
| | Target Area | |
| | Goals Supported | Public facility rehabilitation Improve public infrastructure: modern & safe |
| | Needs Addressed | Modernize public facilities and infrastructure |
| | Funding | CDBG: \$721,666 |
| | Description | The City will allocate CDBG funds towards public facilities and infrastructure improvements to assist LMI individuals and households. This includes \$61,000 from prior year funds to go towards public facilities and infrastructure. |
| | Target Date | 6/30/2022 |
| | Estimate the number and type of families that will benefit from the proposed activities | Public Facility or Infrastructure for Low/Moderate Income Housing Benefit: 5,590 households Homelessness Prevention: 200 persons |
| | Location Description | Eligible activities citywide. |

| | | |
|---|--|---|
| | Planned Activities | Planned public facilities improvement activities include: Stair Project: \$300,000 Other Facilities & Infrastructure: Carver Foundation - Roof Replacement (HUD Matrix Code: 03E): \$87,500 Domestic Violence Crisis Center - Office to bedroom conversion (HUD Matrix Code: 03C): \$25,500 Public Infrastructure Improvements (HUD Matrix Code: 03K, 03Z) |
| 4 | Project Name | CDBG: Housing Programs |
| | Target Area | |
| | Goals Supported | Residential rehabilitation |
| | Needs Addressed | Increase high quality and affordable housing |
| | Funding | CDBG: \$66,180 |
| | Description | Increase high quality and affordable housing |
| | Target Date | 6/30/2022 |
| | Estimate the number and type of families that will benefit from the proposed activities | Rental units rehabilitated: 15 Household Housing Unit Homeowner Housing Rehabilitated: 5 Household Housing Unit |
| | Location Description | Eligible activities citywide. |
| | Planned Activities | Planned activities for housing programs include (HUD Matrix Code: 14A, 14B, 14H): Home Front - Critical Home Repairs: \$17,000 Open Door Shelter - Exterior door replacements: \$36,280 Keystone House Genoa Deck Replacement: \$12,900 |

AP-50 Geographic Distribution – 91.220(f)

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

The City of Norwalk does not allocate funding based solely on geographic requirements. Individuals or households must meet income qualifications in order to receive direct assistance from activities and services in the CDBG program. For eligible activities to public facilities & infrastructure improvements as well as economic development opportunities the City will be targeting low- to moderate-income identified census tract areas in need. See below on how the City will determine these areas.

Geographic Distribution

| Target Area | Percentage of Funds |
|--------------------|----------------------------|
| | |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The City of Norwalk does not allocate funding based solely on geographic requirements. When the project or planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order to receive assistance from the program. In these instances, City staff and/or one of its partner agencies shall complete an in-take and eligibility status review of the applicant individual, or household, before the project/activity is initiated.

Additionally, the City has identified infrastructure and public facility improvement activities. In which case, the planned activities will serve a community, neighborhood or “area”. These projects (or activities) are said to have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low to moderate-income.

To determine these Tracts the City will be utilizing HUD CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has redefined the eligible tracts within the jurisdiction. The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City anticipates to continue working on housing assistance for LMI households and has added new housing projects and goals. The City has also determined that existing housing rehab projects will be funded from available RL funds, and will prioritize these assistance projects.

| One Year Goals for the Number of Households to be Supported | |
|--|----|
| Homeless | 15 |
| Non-Homeless | 5 |
| Special-Needs | 0 |
| Total | 20 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|--|----|
| Rental Assistance | 0 |
| The Production of New Units | 0 |
| Rehab of Existing Units | 20 |
| Acquisition of Existing Units | 0 |
| Total | 20 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

N/A

AP-60 Public Housing – 91.220(h)

Introduction

The Norwalk Housing Authority (NHA) is the principal provider of assisted housing in Norwalk. NHA operates 18 public housing properties with a total of 1,034 units. All units are intended to serve low- and moderate-opportunity households, with 698 units targeting families and 336 units targeting elderly. Additionally, NHA manages 896 Section 8 Housing Choice Vouchers.

Actions planned during the next year to address the needs to public housing

In PY 2021 the NHA plans to complete the third and final phase of the Soundview Landing (buildings D and E) development project. Completion is scheduled for June and July 2021.

The NHA is currently in the process of planning the renovation of Colonial Village, a 200 affordable multifamily unit housing development which was originally built in 1952. The development is situated on 25.7 acres of which 7.6 acres are vacant. The redevelopment plan calls for a multiphase effort that when completed will have available 269 affordable units.

Using the Choice Neighborhoods Initiative grant, NHA added 21 project-based vouchers for the Washington Village Development (Soundview Landing is the name of the CNI development) under Phase II, which was completed last March 2020. For Phase III, NHA will add 26 more project-based vouchers with a projected completion date of July 2021. The NHA intends to apply for a Choice Neighborhoods Initiative (CNI) planning grant in 2020-2021 for the redevelopment of Roodner Court once grants are again available.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

NHA has a Resident Advisory Board (RAB) to give residents a voice in making recommendations for the development of NHA's Five-Year Plan. Educating residents on the purpose of the RAB and how their feedback will be used to inform planning efforts can help encourage participation. There are currently 19 RAB members. Comments from RAB members and responses from NHA are publicized for transparency.

As part of CNI, NHA plays a vital role in informing residents of Washington Village their right to return to the new development with first priority through public and resident meetings along with partnering with local organizations to provide services related to education, employment, health, and wellness.

The NHA's Section 8 Homeownership program provides eligible Norwalk Section 8 Housing Choice Voucher and Public Housing residents with the opportunity to purchase a home with Section 8 assistance. For first time homebuyers who meet minimum employment, income and financial requirements, and with a mortgage of 20 years or longer, NHA can assist with a portion of the monthly mortgage for 15 years.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A. The NHA is not designated as troubled.

Discussion

N/A.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City of Norwalk does not directly receive Emergency Solutions Grant (ESG) or Housing Opportunities for Persons with AIDS funds. These funding sources are administered through the Fairfield County Continuum of Care/Opening Doors Fairfield County (ODFC). The City will continue to support and collaborate with ODFC and homeless housing and service providers to prevent and end homelessness. The initiatives of ODFC are:

- **Ending Chronic Homelessness:** Streamlining and standardizing the housing process to minimize roadblocks for all people experiencing homelessness. A list of persons experiencing homelessness is created and updated continuously and a system of standardized tracking ensures the community's most vulnerable citizens are quickly and efficiently connected with the most appropriate housing options.
- **Project Homeless Connect:** Providing free access to comprehensive health and human services in one location, on one day each year.
- **Annual Point-in-Time Count (PIT):** Each January, Opening Doors of Fairfield County [ODFC] staff and volunteers partner with the Connecticut Coalition to End Homelessness [CCEH] to conduct a hands-on count of homeless residents located within the Fairfield County region. The annual Point in Time Count is mandated by the U.S. Department of Housing and Urban Development [HUD] to provide a snapshot of homelessness on a single night.

Opening Doors Fairfield County (ODFC) operates a Food, Fuel and Shelter community. This group consists of staff from governmental agencies and nonprofits involved in providing food, fuel, and shelter services to households impacted by poverty, food insecurity, and homelessness. The primary function of this group is to collaboratively identify service gaps and discuss strategies for solutions addressing homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

ODFC operates the Fairfield County Coordinated Access Network (CAN), providing one point of entry for anyone experiencing a housing crisis by calling 2-1-1. A housing specialist provides referrals to service providers to prevent people from entering the homeless system. In conjunction with a continuously updated list of homeless individuals, CAN uses the Vulnerability Index – Service Prioritization Decision Assistant Tool when providing referrals. More commonly referred to as the VI-SPDAT, the tool is an evidenced-based common assessment tool that informs the type of housing intervention needed to end homelessness. The tool assesses the health and service needs of homeless individuals and families, and

guides placements on the Housing Registry.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Open Door provides an emergency shelter with over 95 beds and operating a kitchen and pantry in the same building. Additionally, counseling, case management, educational opportunities, job training and certification, employment assistance, and supportive housing services are offered at the nearby Smilow Life Center. Homeless individuals with special needs in need of emergency and transitional housing are also addressed at various service providers such as the Domestic Violence Crisis Center and Malta House.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In addition to the services described previously, ODFC provides several intervention services to ensure that individuals experiencing homeless receive stable housing. This includes Rapid Rehousing, Housing First Collaborative (HFC), and Permanent Supportive Housing (PSH). Rapid Rehousing provides just enough financial assistance and services to help people experiencing homelessness find appropriate housing. HFC immediately moves homeless individuals from the streets or shelters into their own housing units and provides time-limited case management support. PSH provides affordable housing and holistic case management services to clients who are at repeated risk of homelessness. Other homeless service providers, such as Family & Children's Agency, offer supportive housing programs to help formerly homeless adults learn the skills to maintain housing and independent living through individual case management, educational workshops, and other community-based activities.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

ODFC conducts a diversion strategy to prevent households from entering a shelter by providing immediate alternate housing arrangements. Diversion assistance includes security deposits, hotel stays, car repair, and transportation costs. These services can be reach through 2-1-1.

NHA hosts a family self-sufficient program for their clients to achieve financial stability after leaving public

housing. Services include job training, job referrals, resume development, financial literacy and management, credit counselling and repair, homeownership programs, mortgage assistance, higher education, and parenting skills. Participants who see increases in income will be able to save a portion of their rent into an escrow savings account, only to be received after graduating from the program. Participants are also eligible to participate in NHA's Section 8 Homeownership program if they meet eligibility requirements, allow HCV holders to purchase a home with Section 8 assistance. NHA can provide mortgage assistance for up to 15 years.

In addition to the services described previously, Family & Children's Agency participates in the State's Empowering People for Success Program (EPS). The program assists current and past recipients of Temporary Assistance for Needy Families (TANF) achieve self-reliance and independence. The program consists of three components: prevention services, safety net, and employment success. Prevention services provides program participants who are in jeopardy of losing TANF benefits a second chance based on Individual Performance Contracts (IPC). Safety net provides financial assistance for up to twelve months participants who have exhausted TANF time limits and cannot receive an extension. Finally, the Employment Success Program assists clients who are receiving benefits for the first time, providing intensive support to eliminate barriers to sustained employment and identify and achieve personal goals.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Norwalk is currently in the process of updating its Analysis of Impediments to Fair Housing Choice (AI); the following contributing factors to affordable and fair housing were identified in the most recent draft of the AI: housing cost burden, land use and zoning laws, location and type of affordable housing, lack of access to community assets, and discriminatory practices in the private sector.

While cost-burden is the largest barrier to affordable housing in Norwalk, these needs are exacerbated by policies and historical precedent that do not further fair housing choice. Norwalk intends to use all possible sources of funding and leverage to create and preserve affordable and fair housing.

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

The City will continue to enforce and expand the workforce housing regulation requires that developments with twenty units or more shall provide a minimum of 10% of the total number of housing units as affordable workforce housing unit. The housing units are deed restricted to remain affordable in perpetuity. Payment in-lieu of affordable housing is offered as an alternative for developers to continue increasing the supply of affordable housing options in Norwalk. Rehabilitation and preservation of existing housing stock will be the primary method of increasing affordable housing supply and choices in Norwalk. NHA will continue to recruit landlords to participate in the Section 8 program, especially in higher opportunity areas, and convert public housing to other forms of affordable housing as necessary to maintain quality homes in the housing inventory.

Following up on improving opportunities for low- and moderate-income residents, Norwalk is also planning to increase accessibility to community assets, particularly regarding transit-oriented development (TOD). TOD efforts in growing areas and centers of employment, such as East Norwalk and along the Merritt Parkway, will increase access to jobs for LMI residents. Additionally, Wheels2U, a free on-demand shuttle service, will be assessed to improve transit options for Norwalk residents. At a grassroots level the City will work to establish neighborhood organizations in areas where they do not exist to help engage residents and local stakeholders.

To address discriminatory behavior, the City will collaborate with the Connecticut Fair Housing Center, local banks, and the Connecticut Housing Finance Authority to provide education on fair housing, financial literacy, credit counseling, and foreclosure counseling for all parties involved.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Norwalk has designated the Norwalk Redevelopment Agency (NRA) as the administrator of Norwalk's annual entitlement of CDBG funds. The agency has a mission to improve the physical economic and social environment of the Norwalk Community by serving as the primary governmental organization dedicated to promoting commercial development, to preserving and improving the City's housing stock and to securing and administering the resources required to carry out these goals. As administrator of the CDBG program, the agency is responsible for overall program management, coordination, monitoring, reporting and evaluation. This section provides other actions the NRA will take to address the needs of the community.

Actions planned to address obstacles to meeting underserved needs

The City of Norwalk will continue to implement and annually assess its Language Access Plan to assist individuals with limited English proficiency. If there arises the need, the City will make available citizen participation outreach and notices in other languages.

Actions planned to foster and maintain affordable housing

The City will continue to work on housing rehab projects through its Rehab Program. In PY 2021, this program will be funded with existing RL funds. The City will also continue to enforce the workforce housing regulation requires that developments with twenty units or more shall provide a minimum of 10% of the total number of housing units as affordable workforce housing unit. The housing units are deed restricted to remain affordable in perpetuity. Payment in-lieu of affordable housing will be offered as an alternative for developers to continue increasing the supply of affordable housing options in Norwalk.

Actions planned to reduce lead-based paint hazards

The Norwalk Health Department will continue to conduct lead poisoning prevention and control efforts through its Housing Program. The Housing Section uses trained and certified staff to conduct epidemiological investigations and lead inspections. As part of routine housing code inspections or as a result of a complaint investigation, the Health Department will also conduct lead inspections in homes where children younger than 6 years old reside and provide educational material about lead upon request. NHA and NRA will actively address lead-based paint hazards when carrying out housing rehabilitation and renovation activities, such as in South Norwalk and Wall Street.

Actions planned to reduce the number of poverty-level families

The City of Norwalk's poverty reducing goals, programs and policies aim to increase the incomes of City residents and reduce the number of people who are living in poverty by moving them toward self-

sufficiency. Increased income makes housing more affordable by reducing housing cost burden and by increasing the number of people who can afford to purchase or rent units produced by the Choice Neighborhoods Initiative and NRA's housing rehabilitation and new construction programs. The Norwalk Housing Authority helps residents receiving housing assistance transition to independently maintaining their homes through their family self-sufficiency and educational programs. The activities identified in this plan directly work to reduce the number of poverty level families in Norwalk.

Actions planned to develop institutional structure

The City of Norwalk will continue to collaborate with human and social service agencies and the Continuum of Care to identify potential resources for meeting the service needs of City residents. The City will support the efforts of service agencies to obtain any available resources. The City will also continue to support and encourage the development of new affordable housing units.

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

As part of City Neighborhoods Initiative (CNI), a supportive services plan is being implemented to help residents attain greater self-sufficiency, maintain housing as the area undergoes changes, and bridge opportunities. Collaboration between service providers from a wide variety of sectors is necessary to successfully execute this plan. Supportive services include:

- Education services to support early childhood development through adult career advancement
- Employment services to provide individual assessments, training opportunities, and workforce readiness preparation
- Affordable health and wellness services through routine checkups, specialty service referrals, and assistance with everyday necessities (food, housewares, clothing, utilities, etc.)
- Relocation services accommodating displaced residents while their new housing is being developed

Additionally, many public service activities expanding economic opportunities and increasing access to social services through CDBG funds will efficiently leverage dollars through collaboration and referrals. These public service activities work to improve opportunities for vulnerable populations by providing necessary housing, education, and job opportunities to obtain and maintain future permanent housing.

Program Specific Requirements

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

Introduction:

This section provides the program specific requirements for the CDBG program.

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 | 229,000 |
| 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: | 229,000 |

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. | 80.00% |